

# CONSULTATION REPORT FSC-STD-20-001 V4-0

Conceptual phase consultation for the revision of the  
General Accreditation Standard



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## INTRODUCTION

Forest Stewardship Council (FSC) is revising the General Accreditation Standard <[FSC-STD-20-001 General requirements for FSC accredited certification bodies](#)>. The standard ensures that FSC certifications are managed in a competent, consistent, impartial, transparent, rigorous, reliable and credible manner. The standard is revised together with two related procedures <[FSC-PRO-20-003 Transfer of FSC Certificates and License Agreements](#)> and <[FSC-PRO-20-004 General Requirements for FSC Training Program](#)>.

As part of the conceptual phase, FSC has conducted a focused consultation. The consultation aimed to inform the stakeholders about the directional changes that FSC will be introducing in the next version of the above listed documents and to get stakeholders feedback on key topics considered in this joint revision. To access the summary of the consultation material please click [here](#).

The consultation was open on the FSC Consultation Platform from 17 July 2023 until 11 September 2023. To analyse and present stakeholder's feedback this consultation report is prepared. The consultation report is based on three feedback sources a) FSC Consultation Platform, b) Webinars to present the consultation topics and c) Annual FSC - Certification Body meeting conducted on 6-9 September 2023. The report presents consolidated stakeholders feedback on each topic and FSC comments/response to stakeholder feedback.

The FSC team would like to thank all the participants for their feedback and valuable inputs to the consultation topics.

For further information related to the revision process, please visit the dedicated webpage [here](#). For comments or questions related to the revision process, please contact Farhan Ahmad Butt, process lead, at [systemdevelopment@fsc.org](mailto:systemdevelopment@fsc.org).

## ABBREVIATIONS

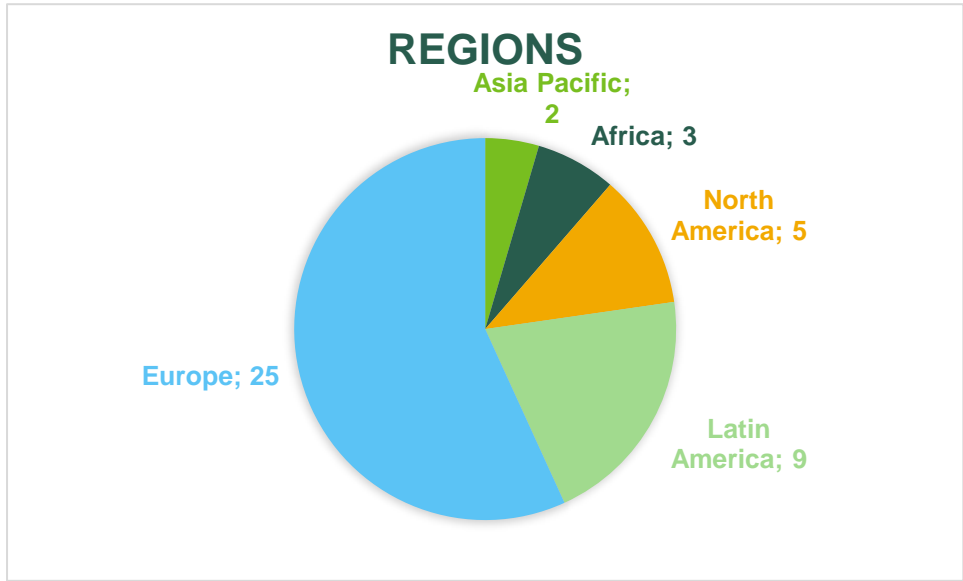
|     |                                  |
|-----|----------------------------------|
| ASI | Assurance Services International |
| CB  | Certification body               |
| CH  | Certificate holder               |
| CoC | Chain of custody                 |
| CW  | Controlled Wood                  |
| FM  | Forest management                |
| FSC | Forest Stewardship Council       |

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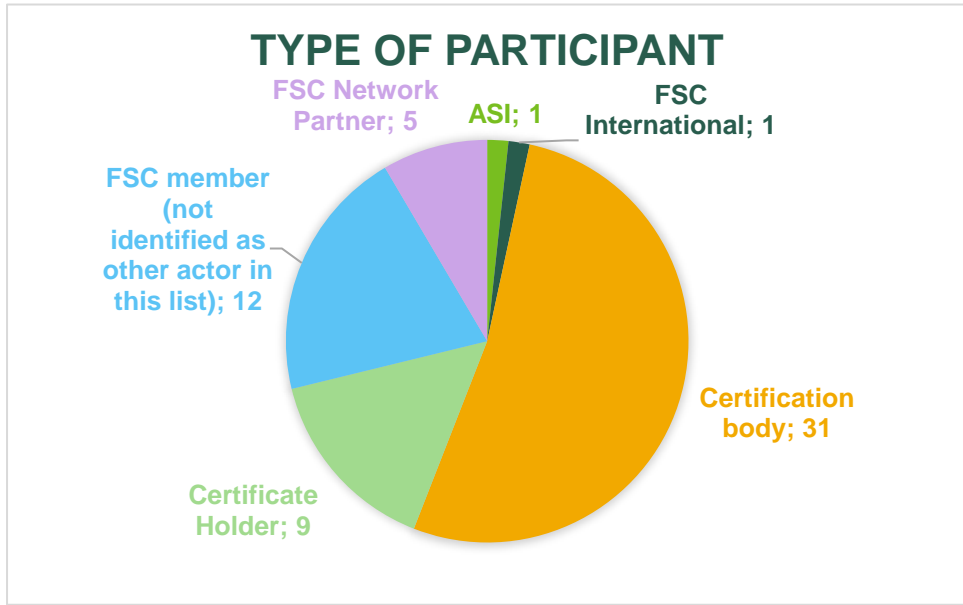
# PART 1 PARTICIPATION IN THE FOCUSED CONSULTATION

59 stakeholders<sup>1</sup> provided feedback in the focused consultation.



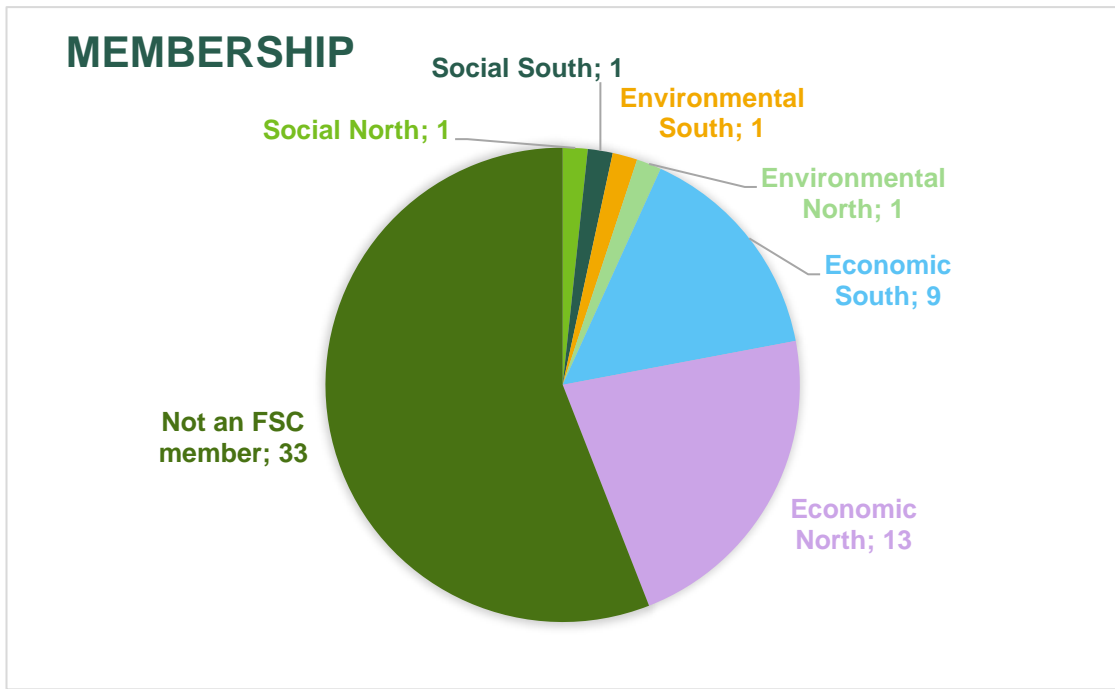
Most of the participants come from Europe, 25. Followed by Latin America, 9.

NOTE: 15 stakeholders that provided input via webinars and CB meeting. Their region is not identified in this chart.



Most respondents belonged to “certification bodies” (31) participant type.

<sup>1</sup> Feedback was collected from the following three sources:  
a) the FSC Consultation Platform (33 stakeholders provided feedback);  
b) three webinars (98 stakeholder participated whereas 20 had provided feedback or raised concerns, therefore for the stakeholder count only 20 participants are considered); and  
c) the FSC - Certification Body meeting in September 2023 Bonn Germany (2 session were conducted with 3 groups in each session to collect feedback on Topic 4 and Topic 7. For the purpose of stakeholder count, response from each group is considered as 1 therefore total stakeholder count for feedback from certification body meeting is considered 6).



Most of the members belonged to the economic chamber (21).

## PART 2 METHODOLOGY

The consultation topics were presented for feedback with both open-ended and closed-ended questions. The closed-ended question asked the respondents to select the level of agreement with the proposed topic (i.e., “to what extent do you agree with...”). The respondent could choose their answer from a Likert scale (i.e., “strongly agree, agree, neutral, disagree, strongly disagree”). Following this, the open-ended question then asked the respondent to provide their rationale (i.e., “please briefly explain your rationale”). For some topics there were no closed-ended questions added to the consultation. For those topics the agreement of the respondent to the proposal or topic is identified from their responses and then added to the analysis to complete the quantitative analysis.

The FSC team conducted a quantitative analysis on the closed-ended questions, and a qualitative analysis on the open-ended questions.

In the quantitative analysis, the responses were quantified as follows:

|                             |     |
|-----------------------------|-----|
| Strongly agree, agree       | 1   |
| Neutral                     | 0.5 |
| Disagree, strongly disagree | 0   |

### A. How to read quantitative results?

The percentage of responses was calculated per stakeholder type to understand the agreement or disagreement of each stakeholder group with the topic of the consultation. For example, 100 in the quantitative analysis table means that all participants from that stakeholder group is in full agreement with (or support) the proposal. Whereas numbers such as 78 or 40 means the percentage of the participants from the stakeholder group that agree with (or support) the proposal. Similarly, 0 means that no participants from the stakeholder group agreed with (or support) the proposal.

### B. How to read qualitative results?

In the qualitative analysis, key messages were identified across all answers and categorized mainly as 'agreement', 'disagreement' and 'alternatives' to the proposal. The qualitative results presents the summary of all key messages and FSC feedback to those messages.

## PART 3 SUMMARY OF COMMENTS AND FSC FEEDBACK

This section is organized according to the topics presented in the focused consultation. Each topic presents: a) brief topic recap (as included in the consultation material), b) the quantitative analysis, and c) the qualitative analysis.

NOTE: An informative topic on changes triggered by EC regulation 765/2008 was also added to the focused consultation. Please click [here](#) to access the summary of this topic.

Table 1: List of consultation topics

| #       | Topic from focused consultation                                   | Reference to FSC-STD-20-001 V4-0    |
|---------|---|-------------------------------------|
| Topic 1 | Redefining accreditation scope (technical and geographical scope) | Section 1.1                         |
| Topic 2 | Certification body rotation                                       | Section 1.2                         |
| Topic 3 | Use of Wood ID Technology   | Whole draft                         |
| Topic 4 | Risk-based approach (Unannounced audit and audit frequency)       | Clause 1.2.3 d) and 4.7.1           |
| Topic 5 | Social auditing skills for forest management evaluation           | Annex 3 Box 2                       |
| Topic 6 | Social auditing skills for chain of custody evaluation            | Annex 2 Table 3                     |
| Topic 7 | Auditor Training (in-person vs. remote)                           | Clause 3.3.5 of FSC-PRO-20-004 V1-0 |

### 1. Topic 1: Redefining accreditation scope (technical and geographical scope)

The accreditation scope of a certification body is based on two components a) technical scope and b) geographical scope. FSC aims to maintain the technical scope requirement that a certification body could either be accredited for forest management (FM) AND chain of custody (CoC) or for chain of custody (CoC) alone. In both cases, the requirements for controlled wood (CW) are an integral part of the accreditation scope. Therefore, FSC proposes to eliminate the option to exclude controlled wood from the technical accreditation scope. Whereas geographical scope is not defined in FSC requirements and FSC is exploring to introduce a geographical scope to accreditation.

#### 1.1 Quantitative

**Question 1. Do you agree with the proposal for mandatory combination (FM/CoC including CW/FM and CoC including CW/CoC) for accreditation scope?**

**Question 3. Do you agree with the proposal of introducing a geographical scope?**

[Click here](#) to understand how to read the quantitative results.

| Question | ASI | Certificate Holder | Certification Body | FSC Member (not elsewhere) | FSC Network Partner |
|----------|-----|--------------------|--------------------|----------------------------|---------------------|
| Q1       | 0   | 100                | 78                 | 64                         | 0                   |
| Q3       |     | 50                 | 40                 | 64                         | 100                 |

## 1.2 Qualitative

**Question 2. Do you have any feedback for the mandatory combinations (FM/CoC including CW/FM and CoC including CW/CoC) for accreditation scope?**

| Key Stakeholder Feedback  | FSC comment   |
|---|---|
| <b>1.2.1 Agreement with the proposal</b>  |   |
| The majority of the respondents agreed with the proposal of making CW/FM a mandatory part of the FM/CoC accreditation scope but asked to introduce a clear and simplified process for this scope extension.   | FSC will work together with the working group to set a clear process for scope extension and align it with ISO and with the already existing requirements of the Assurance Services International (ASI) procedure (ASI-PRO-20-101).   |
| <b>1.2.2 Disagreement with the proposal</b>   |   |
| a) This will add a burden to certification bodies (CBs) to develop report templates, guidance, auditor training, and checklists, even if they have no clients   | Although the CW/FM is an integral part of FM and the revised version of <a href="#">&lt;FSC-STD-30-010 Controlled Forest Management&gt;</a> is now subset of the <a href="#">&lt;FSC-STD-60-00 FSC International Generic Indicators&gt;</a> . Therefore, evaluation standard for CW/FM will be the same as for FM which is <a href="#">&lt;FSC-STD-20-007 Forest Management Evaluations&gt;</a> . However, FSC will explore the options for mandatory and optional accreditation scope together with the working group. |
| b) It is difficult to find auditors with relevant expertise.  |   |
| c) For CW/CoC, auditors need to have additional competency to audit at management unit level rather than only auditing chain of custody certification against FSC CoC standard. In addition to not making CW/FM a mandatory part, FSC should also provide an option to exclude CW/CoC from the CoC accreditation scope. | FSC will explore the options for mandatory and optional accreditation scope together with the working group.  |

**Question 4. Do you have any feedback on introducing the geographical scope of the accreditation into the standard?**

| Key Stakeholder Feedback  | FSC comment   |
|---|---|
| <b>1.2.3 Agreement with the proposal</b>  |   |
| <p>Agree with the proposal to introduce geographical scope to the accreditation however the process for change in accreditation scope should be clear and simplified and FSC should provide guidance for application for this concept with different arrangements of the chain of custody.</p>  | <p>Assurance Services International (ASI) existing procedure for change in accreditation scope should apply.</p> <p>For additional guidance, FSC will add specific examples either in the revised standard or in the roll out of the revised standard to help users to understand the implication of this change.</p>   |
| <b>1.2.4 Disagreement with the proposal</b>   |   |
| <p>a) This would make the processes for internationally operating certification bodies be far more complex (especially multisite certification including sites which are geographical distant from each other).</p> <p>b) It adds administrative burden to all parties involved.</p> <p>c) It would be a barrier to gradual and organic growth and put an additional accreditation burden to expand into new countries especially where there are only a few potential clients.</p> <p>d) It would not bring any value as geographical scope is already included as part of ASI accreditation requirements.</p> | <p>Geographical scope is already a requirement of the ASI accreditation procedure (ASI-PRO-20-101-Accreditation-V5.3). The proposal for introducing this in FSC accreditation requirements is mainly for alignment purposes and to provide the scheme owner perspective.</p> <p>The FSC proposal for the concept of geographical scope includes both:</p> <ul style="list-style-type: none"> <li>a) area in which the certification activity is intended; and</li> <li>b) area in which the certification activity is provided.</li> </ul> <p>With this geographical scope definition, FSC does not see any additional administrative burden on certification bodies operating worldwide. Alternatively, it allows ASI to exclude certain geographical area from the accreditation scope wherever needed or required.</p> |

## 2. Topic 2 Certification body rotation

Motion 61 on Certification Assessment Integrity and Credibility (Motion 61/2017) passed at the FSC General Assembly in 2017 commissioned FSC to conduct an independent analysis of issues related to integrity and credibility of FSC certification. One of the integrity risks identified by this analysis was CB-Certificate Holder (CH) financial dependency. The proposed solution to reduce this integrity risk was to introduce a mandatory transfer of certificate holders to a different certification body after 10 years (mandatory certification body rotation). FSC would like to get stakeholders feedback on this proposal evaluate its feasibility.



## 2.1 Quantitative

### Question 5. Do you agree with the need for introducing a certification bodies rotation requirement?

[Click here](#) to understand how to read the quantitative results.

| Question | ASI | Certificate Holder | Certification Body | FSC Member (not elsewhere) | FSC Network Partner |
|----------|-----|--------------------|--------------------|----------------------------|---------------------|
| Q5       | 100 | 0                  | 0                  | 40                         | 40                  |

## 2.2 Qualitative

### Question 6. Do you see the need for introducing a certification bodies rotation requirement?

### Question 7. Do you think that a mandatory rotation of certification bodies should be introduced globally or only in some regions or countries of high integrity risk?

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| <b>2.2.1 Agreement with the proposal</b>   |   |
| <ul style="list-style-type: none"> <li>a) One of the reasons for lack of identification of non-conformities is the financial link between CH-CB.</li> <li>b) Auditors from the same CB do not critically evaluate the work of other auditors and the new CB might identify the issues that were overlooked.</li> <li>c) Suggest to link the rotation with the certification cycle rather than based on 10 years.</li> <li>d) It helps to improve CB performance and prevent too close ties between CH and CB.</li> </ul> | <p>FSC has not yet finalized the approach to address the integrity and credibility risk identified by an internal research based on <a href="#">Motion 61/2017</a> recommendations. Considering the diverse stakeholder feedback for this proposal, FSC will further explore this proposal and alternatives internally.</p> |
| <b>2.2.2 Disagreement with the proposal</b>  |   |
| <ul style="list-style-type: none"> <li>a) <b>It has no advantages for FSC integrity</b> because i) there would still be the inspected paying the inspectors) ii) same auditor might be auditing at the end as auditors work for more than one CB or change CBs quite often iii) no other scheme has such requirement in place iv) proposal will not work if a CB have two accreditations.</li> <li>b) <b>FSC has already several checks in place</b> i) ASI oversight, ii) auditor rotation, iii)</li> </ul>             | <p>See FSC comment to 2.2.1</p>   |

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impartiality requirements for CBs, iv) witness audit v) unannounced audits.

- c) **Operational hurdles for certification bodies;** i) financial and human resources planning, ii) gradual and organic growth of a CB, iii) not possible in countries with different accreditation partner as per ASI Two-Tier Assurance program iv) it may contradict with trade regulations.
- d) **Challenges for certificate holders** i) in regions with only one CB, ii) to change the certification code on the invoices and delivery notes iii) freedom to chose a CB is based on the performance and services (e.g., multiple certifications) iv) significant financial costs if CH would have to hire two CBs rather than one to cover all certifications.

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### 2.2.3 Alternative proposed by stakeholders

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- a) Setting indicators for credibility and rigor of audits (based on region, context, type of forest, and operation) and measuring certification bodies performance. See FSC comment to 2.2.1
- b) Creating an auditor pool to remove certification body's bias.
- c) Training and calibration of the auditors to improve audit quality.
- d) Mandatory to check non FSC Sales and deeper look into mass balance.
- e) Ensure the separation of the auditors and external advisors.
- 

## 3. Topic 3 Use of Wood ID Technology

FSC is expanding the System Integrity Programme to include more cutting-edge and new technology. As part of this expansion, the Wood Identification (Wood ID) programme is being developed which will enable FSC to check a product sample taken from an FSC supply chain with a declared origin against a reference sample from the declared origin. FSC works together with its partners to have a vast reference dataset as well as to ensure the solid scientific reliance of these tests. More information about the Wood ID programme is available here: <https://fsc.org/en/wood-id>

As part of the wider development of the programme, FSC needs to determine which parties should be involved in the collection of the product samples.

### 3.1 Quantitative

**Question 8. Do you recommend that the certification bodies should be involved in the collection of product samples from FSC supply chains for further testing?**

[Click here](#) to understand how to read the quantitative results.

| Questions | ASI | Certificate Holder | Certification Body | FSC Member (not elsewhere) | FSC Network Partner |
|-----------|-----|--------------------|--------------------|----------------------------|---------------------|
| Q8        | 100 | 67                 | 36                 | 61                         | 75                  |

### 3.2 Qualitative

**Question 9. Please briefly explain your rationale and/or If not certification bodies, then who should be involved?**

| Key Stakeholder Feedback  | FSC comment   |
|---|---|
| <b>3.2.1 Agreement with the proposal</b>  |   |
| <ul style="list-style-type: none"> <li>a) Certification body should be financially compensated for this service.</li> <li>b) FSC should clearly set up the rules for engagement and covering the cost.</li> </ul>   | <p>FSC will consider the points raised in the consultation in further development of the Wood ID program.</p> <p>More information will be shared with all stakeholders later.</p> |
| <b>3.2.2 Disagreement with the proposal</b>   |   |
| <ul style="list-style-type: none"> <li>a) It would impact the audit schedule and could disturb the audit process by collection, documentation, packing and delivery of samples.</li> <li>b) CB/auditor has to take care of import and export regulations including custom rules for carrying wood samples.</li> <li>c) It would increase audit time and audit cost.</li> <li>d) It require additional training for auditors.</li> </ul> | <p>See FSC comment to 3.2.1</p>   |
| <b>3.2.3 Alternative proposed by stakeholders</b>   |   |
| <p>FSC may consider the following as alternative to certification bodies:</p> <ul style="list-style-type: none"> <li>a) National Resource Institutions, having the oversight about all the export/import regulations considering wood samples.</li> </ul>   | <p>See FSC comment to 3.2.1</p>   |

- b) A specialized external service provider or FSC.
- c) FSC local offices or stakeholders with the help of certification bodies.
- d) Industry association representatives or local university representatives.
- e) Certificate holders by making it a certification requirement where certification body/auditor checks the conformity and report data to FSC.
- f) Involving local membership

#### 4. Topic 4 Risk-based approach (Unannounced audit and audit frequency)

FSC is interested in developing a risk-based approach to conduct unannounced audits and to change the frequency of audits depending on level of associated risk such as in certain geographical areas, specific certification or linked with specified risk.

##### 4.1 Quantitative

**Question 10. Do you agree with introducing a risk-based approach to conduct unannounced audits or short notice audits?**

**Question 14. Do you agree that the frequency of the annual audits should be increased to strengthen FSC system integrity?**

[Click here](#) to understand how to read the quantitative results.

| Question | ASI | Certificate Holder | Certification Body | FSC International | FSC Member (not elsewhere) | FSC Network Partner |
|----------|-----|--------------------|--------------------|-------------------|----------------------------|---------------------|
| Q10      | 0*  | 0                  | 53                 | 100               | 72                         | 67                  |
| Q14      | 0   | 0                  | 10                 | 50                | 50                         | 17                  |

\*ASI has supported the idea of a risk-based approach to conduct the unannounced audit if the risk is identified by certification bodies. However, ASI agree to have a provision of unannounced audit with the clear criteria for risk identification (this is also the actual intent of the FSC proposal).

**Question 12. Which of the following pre-requisites or criteria do you agree with to conduct unannounced audits or short notice audits?**

| Options   | ASI | Certificate Holder | Certification body | FSC member (not elsewhere) | FSC Network Partner | Total (no. of stakeholder) |
|---|-----|--------------------|--------------------|----------------------------|---------------------|----------------------------|
| Nr for "Both (geographical area and products/supply chain)" |     |                    |                    |                            |                     | 0                          |
| Nr for "Products or supply chain"                           |     | 1                  | 5                  | 4                          |                     | 10                         |

|                            |   |  |   |   |   |   |
|----------------------------|---|--|---|---|---|---|
| Nr for "Geographical area" |   |  | 1 | 1 |   | 2 |
| Nr for "None of above "    | 1 |  | 4 |   | 1 | 6 |

## 4.2 Qualitative

**Question 11. Do you have any feedback for developing a risk-based approach to conduct unannounced audits or short notice audits?**

**Question 13. Do you recommend any other pre-requisites or criteria or best practice to conduct unannounced audits or short notice audits?**

| Key Stakeholder Feedback  | FSC comment   |
|---|---|
| <b>4.2.1 Agreement with the proposal</b>  |   |
| Unannounced or short notice audits can be a valuable tool to reinforce the FSC credibility but the risk assessment whether to conduct such audits should be impartial and should be done by FSC or ASI.   | FSC will further explore the proposal of developing a risk-based approach with the working group with the objective to have clear criteria for risk identification, risk assessment and risk mitigation. FSC will keep stakeholders up to date with a progress on this topic. |
| <b>4.2.2 Feasibility and Practical Concerns</b>   |   |
| <ul style="list-style-type: none"> <li>a) Objective, clear and consistent approach and parameters are necessary for risk identification.</li> <li>b) Regular use is not feasible and it should not be applied to fully compliant organizations.</li> <li>c) Availability of relevant personnel and access to documents or records.</li> <li>d) It could lead to longer audit duration.</li> <li>e) Conflict of interest as CBs and CHs may have an incentive to bring risk levels down.</li> <li>f) Coordination and logistics for unannounced audits may be more complex.</li> <li>g) Suitable for certain topics or areas but not for whole audits.</li> </ul> <p><b>Potential impact on CHs</b></p> <ul style="list-style-type: none"> <li>h) CHs may perceive it as unpredictable and disruptive.</li> <li>i) Additional cost due to increased audit time.</li> </ul> | See FSC comment to 4.2.1  |
| <b>4.2.3 Criteria for risk identification: to conduct unannounced or short notice audits</b>  |   |
| <ul style="list-style-type: none"> <li>a) FSC National Risk Assessments.</li> <li>b) Geographical area with a high number of complaints from stakeholders.</li> </ul>   | See FSC comment to 4.2.1  |

| Key Stakeholder Feedback | FSC comment |
|--------------------------|-------------|
|--------------------------|-------------|

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>c) Risk profiling on geographical location may be discriminatory, alternative would be high risks products or supply chains.</li> <li>d) Feedback from the media regarding violation of law.</li> <li>e) Findings from ASI compliance audits and major nonconformities in certain regions or supply chains.</li> <li>f) Information from the Transaction Verification Group.</li> <li>g) Audits initiated after false claims have been made by the certificate holder.</li> <li>h) Risk profile by country and it should be concluded by a higher governing body in FSC and documented to ensure consistency.</li> </ul> |  |
|---|--|

|   |
|---|
| <b>4.2.4 Criteria for risk assessment:</b> to select a certificate holder for unannounced audit or short notice audit |
|---|

|  |                                 |
|--|---------------------------------|
| <p>Clear criteria is needed for CBs to chose a CH once the risk at country or supply chain is identified by FSC. Otherwise, If the risk is identified at the country level, all CHs within that country should be involved in unannounced audits to avoid disputes and certificate holders shifting to CBs that don't conduct unannounced audits.</p> <p>Alternative may be to consider a certain percentage of CHs for unannounced audits based on risk at the country or supply chain level.</p> <p>Criteria for selective a certificate holder at country or supply chain level:</p> <ul style="list-style-type: none"> <li>a) Substantiated concerns or evidence of non-compliance.</li> <li>b) CH may be selected based on the topic for example core labour requirements.</li> <li>c) Criteria for selection should included in the risk assessment by considering risk at country level and risk at CH-level by including factors such as repeated major nonconformities, false claims, suspicious ownership.</li> <li>d) Performance of CH regarding identified risk.</li> </ul> | <p>See FSC comment to 4.2.1</p> |
|--|---------------------------------|

|   |
|---|
| <b>4.2.5 Criteria for risk mitigation</b> |
|---|

|  |                          |
|--|--------------------------|
| <b>Decision between unannounced and short notice audit</b> | See FSC comment to 4.2.1 |
|--|--------------------------|

| Key Stakeholder Feedback  | FSC comment |
|---|-------------|
| <ul style="list-style-type: none"> <li>a) Unannounced audits should be conducted when there is a suspicion of fraud.</li> <li>b) Short notice audits can be used for verification purposes.</li> </ul> <p><b>Frequency of unannounced audits</b></p> <ul style="list-style-type: none"> <li>a) For CoC, one unannounced audit at least six months after initial certification and one other in the certification cycle.</li> <li>b) For FM one unannounced audit in the certification cycle.</li> </ul> |             |

**Question 15. Do you have any feedback for developing a risk-based approach to increase the frequency of the annual audits?**

| Key Stakeholder Feedback   | FSC comment  |
|--|--|
| <b>4.2.6 Support developing a risk-based approach to increase the frequency of the audits</b>  |  |
| <ul style="list-style-type: none"> <li>a) Frequency should only be increased for targeted certificate holders based on risk analysis.</li> <li>b) Only in case of substantiated allegations of serious nonconformance.</li> <li>c) Should be applied to certificate holders with high number of complaints.</li> </ul> <p>FSC should also consider decrease in frequency with lower risk.</p>  | <p>Based on stakeholder feedback FSC agrees not to change the frequency requirements in the revised standard and keep the minimum requirement for having 5 audits per certification cycle. FSC would also continue to leave it for CBs to decide on a case-by-case basis whether to increase the audit frequency following the criteria given in the Clause 4.7.1 &lt;<a href="#">FSC-STD-20-001 General requirements for FSC accredited certification bodies</a>&gt;.</p> |
| <b>4.2.7 Do not support developing a risk-based approach to increase the frequency of the audits</b>   |  |
| <ul style="list-style-type: none"> <li>a) Difficult to developed a standardized and a neutral approach that can be applied. Consistently without any bias by all certification bodies.</li> <li>b) It will make the certification process slower and expensive.</li> <li>c) It will limit the access of small or medium size organizations to certification.</li> <li>d) Certification bodies already have the opportunity to increase the frequency wherever needed.</li> </ul> | <p>See FSC comment to 4.2.6</p>  |
| <b>4.2.8 Alternatives to developing a risk-based approach to increase the frequency of the audits</b>  |  |

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| <ul style="list-style-type: none"> <li>a) Enhance the grievance channels provided by the FSC and ASI so stakeholders comments are duly heard.</li> <li>b) Set requirements to improve the quality of the audit.</li> <li>c) Test use of blockchain for CoC.</li> <li>d) Unannounced assessment by ASI for both CBs and CHs.</li> <li>e) Strengthen accreditation and stakeholder engagement requirements.</li> </ul> | <p>Alternatives proposed by stakeholders such as setting up grievance channels, testing blockchain and ASI assessment go beyond the scope of this revision thus will not be addressed with the revised standard. However, for some proposals, FSC is already working such as technological solutions including blockchain, Wood ID etc.</p> |

## 5. Topic 5 Social auditing skills for forest management evaluation

FSC is considering to make the requirements for audit team composition in Annex 3 Box 2 <FSC-STD-20-001 General requirements for FSC accredited certification bodies> stricter and interested to get stakeholders feedback if the requirements for the inclusion of social experts in audit teams for forest management evaluations are stringent enough to ensure the identification of social risks and associated non-conformities.

### 5.1 Quantitative

#### Question 16. Are FSC requirements for inclusion of social experts in FM audit team strong enough?

[Click here](#) to understand how to read the quantitative results.

| Question | Certificate Holder | Certification Body | FSC Member (not elsewhere) | FSC Network Partner |
|----------|--------------------|--------------------|----------------------------|---------------------|
| Q16      | 100                | 86                 | 50                         | 50                  |

#### Question 18. For which type of forest management evaluations (Pre-evaluation, main evaluation, surveillance evaluation, and re-evaluation) do you think a social expert should be mandatory?

| Options                                 | Certificate Holder | Certification Body | FSC Member (not elsewhere) | FSC Network Partner | Total (no. of stakeholders) |
|---|--------------------|--------------------|----------------------------|---------------------|-----------------------------|
| Nr for "Main evaluation"                |                    | 1                  |                            |                     | 1                           |
| Nr for "Main evaluation, Re-evaluation" |                    |                    | 1                          |                     | 1                           |



|  |   |   |   |   |    |
|--|---|---|---|---|----|
| Nr for “Main evaluation, Surveillance evaluation, Re-evaluation” |   | 1 |   |   | 1  |
| Nr for “Pre-evaluation, Main evaluation, Re-evaluation”          |   |   | 1 | 1 | 2  |
| Nr for “All of above”  |   |   | 3 |   | 3  |
| Nr for “None of above”   | 2 | 9 | 2 | 2 | 15 |

## 5.2 Qualitative

**Question 17. Are FSC requirements strong enough or additional social expertise (with respect to a specific Principle and Criteria) needed other than the one mentioned in FSC-STD-20-001 (Annex 3 Box 2 for audit team members for forest management audits)?**

**Question 19. In which circumstances (e.g. if there are stakeholders complaints, non-conformities) should the inclusion of a social expert in audit team be mandatory?**

| Key Stakeholder Feedback | FSC comment |
|--------------------------|-------------|
|--------------------------|-------------|

### 5.2.1 Current requirements are sufficient

- |  |   |
|--|---|
| a) Existing qualification requirements for FM auditor are sufficient to cover the social issues in a FM audit. | FSC will further clarify the wording and intent of the requirements for inclusion of technical experts (social expert) in audit teams and link it with the specific Principles and Criteria (P&C 3 and 4 <a href="#">FSC-STD-01-001</a> ) and to the FSC International Generic Indicators ( <a href="#">FSC-STD-60-004</a> ) where the inclusion of a social expert is mandatory. |
| b) Existing requirements for audit team composition are sufficient to cover social issues in a FM audit.       |   |
| c) Additional competency requirements for auditor may lead to auditor shortage.                                |   |
| d) Additional experts than what is mentioned in the existing standard may have an impact on audit cost.        |   |

### 5.2.2 Current requirements are not sufficient

- |  |   |
|--|---|
| a) Social expert (such as anthropologists, sociologists) should be mandatory: <ul style="list-style-type: none"> <li>i. in high-risk situations;</li> <li>ii. with major non-conformities or complaints on social issues;</li> <li>iii. negative feedback received in the stakeholders’ consultation;</li> <li>iv. for evaluation of Free and Prior, Informed Consent (FPIC) and ILO convention requirements;</li> <li>v. for evaluations in conflict areas (with indigenous people, HCV, Intact Forest Landscape);</li> <li>vi. may be for certain size threshold;</li> </ul> | Current requirements for FM audit team composition (Annex 3 Box 2 <a href="#">FSC-STD-20-001</a> ) specify the inclusion of technical experts (social expert) where there is interaction with neighbouring communities, for questions related to indigenous or community rights, tenure issues and workers rights with respect to employment legislation. In the wording of the revised standard, the requirements will be more clarified with respect to specific Principles and Criteria (P&C 3 and 4 <a href="#">FSC-STD-01-001</a> ) and to the FSC International Generic Indicator ( <a href="#">FSC-STD-60-004</a> ) where the inclusion of a social expert is mandatory. |
|--|---|

| Key Stakeholder Feedback | FSC comment |
|--------------------------|-------------|
|--------------------------|-------------|

vii. if the auditor recommended the inclusion of an expert during the next audit.

### 5.2.3 Alternatives to ensure sufficient social expertise exists in the audit team

- |   |  |
|---|--|
| a) Additional training of auditors on auditing social issues.                         | FSC will explore the proposed alternatives together with the relevant teams. |
| b) Additional competency requirements for FM auditors.                                |  |
| c) Increased oversight to check if the current requirements are implemented properly. |  |

## 6. Topic 6 Social auditing skills for chain of custody evaluation

Internal research at FSC has indicated that the social risks and non-conformities related to FSC core labour requirements are not systematically identified in chain of custody evaluations due to lack of understanding and awareness on labour issues. FSC is interested to explore how to complement building auditor competency around FSC core labour requirements in chain of custody evaluations to support recent changes in the FSC CoC Standard.

### 6.1 Quantitative

**Question 20. Do you think (additional) social auditing skills for chain of custody auditors are needed to audit FSC core labour requirements?**

[Click here](#) to understand how to read the quantitative results.

| Question   | ASI | Certificate Holder | Certification Body | FSC Member (not elsewhere) | FSC Network Partner |
|------------|-----|--------------------|--------------------|----------------------------|---------------------|
| <b>Q20</b> | 100 | 50                 | 71                 | 69                         | 50                  |

## 6.2 Qualitative

**Question 21. Do you recommend any specific training for chain of custody auditors to audit FSC core labour requirements (e.g. SA 8000, ISO 26000 etc.)?**

**Question 22. Should FSC consider auditors qualified for a certain equivalent scheme competent for auditing FSC core labour requirements for FSC chain of custody? If yes, then for which scheme or international standard?**

**Question 22. Should FSC consider auditors qualified for a certain equivalent scheme competent for auditing FSC core labour requirements for FSC chain of custody? If yes, then for which scheme or international standard?**

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| <b>6.2.1 Additional skills are not needed</b>  |   |
| <ul style="list-style-type: none"> <li>a) FSC core labour requirements should not be audited in the same depth as done by other social audits (SA 8000, ISO 26000).</li> <li>b) Additional competency requirements may lead to auditor shortage.</li> </ul>  | <p>Audit teams need to have the expertise to verify CH conformity with the FSC requirements and it is the responsibility of the certification body to ensure that all the needed expertise is covered including auditing FSC core labour requirements (Clause 11.3 e FSC-STD-20-011). FSC will explore and clarify the minimum requirements to complement building auditor competency together with the FSC <u>CoC standard revision</u>.</p> |
| <b>6.2.2 Additional skills are needed</b>  |   |
| <ul style="list-style-type: none"> <li>a) Auditor shall have experience or knowledge of labour requirements of the country where the audit takes place.</li> <li>b) This should be linked with country or regional considerations depending on the risk, if there is a high risk of non-conformity with FSC core labour requirements maybe additional social expertise are needed for auditors otherwise not.</li> </ul> | <p>See FSC comment to 6.2.1</p>   |
| <b>6.2.3 Alternatives to requirements for additional social skills</b>   |   |
| <ul style="list-style-type: none"> <li>a) Additional focus should be given on auditing FSC core labour requirements during auditor initial and ongoing trainings.</li> <li>b) Additional competency trainings for auditors on SA 8000, ISO 26000, ISO 45000, SEDEX SMETA however we suggest that FSC provides tailored tools/trainings to CoC auditors.</li> </ul>   | <p>The &lt;FSC-PRO-20-004 General Requirements for an FSC Training Programme&gt; is under revision together with this standard. Section 7 of the procedure will be amended to include content on auditing FSC core labour requirements.</p> <p>See FSC comment to 6.2.1</p>   |

## 7. Topic 7 Auditor Training (in-person vs. remote)

FSC is interested to explore options and to get stakeholder feedback for replacing (fully/partially) in-person sessions in auditors qualification trainings with remote session.

### 7.1 Quantitative

**Question 23. Do you propose replacing in-person sessions for auditor qualification training with remote training?**

[Click here](#) to understand how to read the quantitative results.

| Question | Certificate Holder | Certification Body | FSC Member (not elsewhere) | FSC Network Partner |
|----------|--------------------|--------------------|----------------------------|---------------------|
| Q23      | 100                | 100                | 100                        | 100                 |

**Question 25. Do you think the in-person trainings should be replaced with remote trainings only for forest management or only for chain of custody or for both?**

| Options                     | Certificate Holder | Certification body | FSC member (not elsewhere) | FSC Network Partner | Total (no. of stakeholder) |
|-----------------------------|--------------------|--------------------|----------------------------|---------------------|----------------------------|
| Nr for "Chain of Custody"   |                    | 2                  | 2                          |                     | 4                          |
| Nr for " Forest Management" |                    |                    |                            |                     | 0                          |
| Nr for "Both (FM & CoC)"    | 2                  | 15                 | 3                          | 2                   | 22                         |
| Nr for "None of above"      |                    |                    | 1                          |                     | 1                          |

### 7.2 Qualitative

**Question 24. Please briefly explain your rationale and/or do you have any additional positive/negative arguments than to what listed above?**

| Key Stakeholder Feedback  | FSC comment  |
|---|--|
| <b>7.2.1 Tools and Techniques to ensure effectiveness of online lectures/trainings</b>  |  |
| <p>a) <b>Participants being distracted by other sources:</b> Mobiles switched off, camera always on, microphone switched-off unless wants to intervene, "raise hand",</p> <p>b) <b>Risks of exam falsification:</b> Exam taken at specific time, with time limit. Camera on and microphone switched-off. Before exams you can ask participants to show them the entire room where they are sitting in – it may not be a problem if candidates</p> | <p>FSC proposal is to review the requirement for presenting lectures online as part of auditors initial and ongoing qualification requirement. Whereas the requirement to maintain the in-person attendance to witness audits apply as it is.</p> <p>FSC will work together with the working group to draft minimum requirements for delivering lectures remotely.</p> |

## Key Stakeholder Feedback

## FSC comment

look up information, as long as they manage within the time limits (it is important that they know where to look, but do not need to memorise everything. Be mindful about the kinds of exam questions, if you ask across certain content areas it is harder to look up the answer.

- c) **Exercises and group work**: Break groups into separate “rooms” and facilitators (trainers/RP) in each room to kick-start and facilitate discussions. Group participants into similar time zone. Small working group
  - d) **Time zones**: Schedule training time to avoid very early/late sessions. Extend training time to ensure enough break and maximum number of sessions each day.
  - e) **To read participants' focus and presence**: Maintain engagement through interaction, knowing the participants (& their background) allows for the trainer to use their experience and bring individuals in the discussion. Request participants to use video. Explain clearly to participants that their level of engagement will be assessed by the trainers and will contribute to the final assessment score for the course.
  - f) **Connection issues can make course delivery deficient**: Minimum requirement for bandwidth and require test to be sent beforehand.
  - g) **Structure of the course**: Longer and split the days (4-6 hrs session) with longer breaks.
  - h) **Training and training material**: Special training for the trainers to conduct an online training and training material needs to be revised, pulled together, made more interactive.
-

**Question 26. Do you have recommendations for conditions under which an in-person training can be replaced with a remote training?**

| Key Stakeholder Feedback   | FSC comment  |
|--|--|
| <b>Conditions for delivering lectures online</b>   |  |
| <p>Should be left on training providers to decide on case-by-case basis considering the experience, location and preferences of the delegates who will be attending the training (either remote or in-person) but an appropriate balance shall be maintained including an appropriate measures to address the negative arguments highlighted.</p>              | <p>FSC will work together with the working group to draft minimum requirements for delivering lectures remotely.</p> |
| <b>Criteria for delivering lectures online:</b>  |  |
| <ul style="list-style-type: none"><li>a) If the participants are less than 10 (limiting the number of participants);</li><li>b) Initial training is in-person and after that remote training should be allowed;</li><li>c) Set upper limit for offering remote training as 50%;</li><li>d) Additional supervision for participants trained remotely.</li></ul> |  |



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