



## **UPDATE ON CHAIN OF CUSTODY ADVICE NOTES FOR CERTIFICATION BODIES: EVALUATION OF CONTRACTORS AGAINST THE FSC CORE LABOUR REQUIREMENTS**

### **TRANSITION END DATES**

The transition end date for both ADVICE-40-004-23 V2-0 (page 26) and ADVICE-20-11-16 V2-0 (page 13) is set at 31 December 2025.

#### **Certificate Holders & Applicants (ADVICE-40-004-23 V2-0)**

Certificate holder/applicants (and their contractors with outsourcing agreements) are to conform to the requirements in ADVICE-40-004-23 V2-0 by this date (31 December 2025).

Failure to do so will result in non-conformance from 1 January 2026.

#### **Certification Bodies (CBs) (ADVICE-20-011-16 V2-0)**

Certification bodies must ensure that all necessary process updates, including auditor training, are completed by 31 December 2025. While CBs are encouraged to begin evaluations already now - the effective date was 1 November 2024 - the extended transition period allows sufficient time for process adjustments, auditor training, and audit planning.

This extension was introduced based on feedback received during the revision process, highlighting the need for additional time to adapt to the changes.

From 1 January 2026, CBs must evaluate all certificate holders and applicants according to these updated requirements.

### **APPLICATION OF CLAUSE 1.3 OF ADVICE-40-004-23 V2-0**

#### **Certificate Holders & Applicants**

ADVICE-40-004-23 V2-0 provides the requirements for non-FSC-certified companies with outsourcing agreements with the organization to commit to the FSC CLR requirements and be included in the organization's self-assessment.

Clause 1.3 of ADVICE-40-004-23 V2-0 provides that if a non-FSC-certified has been audited (1<sup>st</sup>-/2<sup>nd</sup>-/3<sup>rd</sup>-party audit) covering the CLR requirements, this may be used by the certification body in their classification of risk for ADVICE-20-011-16 V2-0. The only requirement for the certificate holder/applicant is to provide evidence of the audit(s) 'if applicable' to the CB.

In many cases, this clause will not be applicable, as contractors have not been subject to such audits (1<sup>st</sup>-/2<sup>nd</sup>-3<sup>rd</sup>-party).

#### **Certification Bodies (CBs)**

ADVICE-20-11-16 V2-0 provides for CBs to evaluate contractors operating under outsourcing agreements, including potentially checking 1<sup>st</sup>-/2<sup>nd</sup>/3<sup>rd</sup>-party on-site audit(s) of the contractor that meet the requirements in clause 1.3 b) of ADVICE-20-011-16 V2-0.

This clause only applies if such an audit has taken place. If no such audit has taken place, the CB will look to the other requirements to determine whether the outsourcer is 'low risk' or 'high risk'.

The CB relies on the certificate holder/applicant to provide the necessary audit records to them, only when this is applicable.