

# PUBLIC CONSULTATION REPORT

Public consultation on the general requirements for  
certification bodies and related procedures



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FOR ALL  
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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 drafting phase, FSC has conducted a public consultation on the following drafts:

1. FSC-STD-20-001 V5-0 Draft 2-0 including FSC-PRO-20-003 V2-0 Draft 1-0 as Annex 6
2. FSC-PRO-20-004 V2-0 Draft 1-0

The consultation aimed to receive stakeholders' comments and inputs on the draft documents. To access the summary of the key changes introduced to the draft documents please [click here](#).

The consultation was open on the FSC Consultation Platform from 23 September 2024 until 21 November 2024. To analyse and present stakeholder's feedback this consultation report is prepared. 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 draft documents.

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

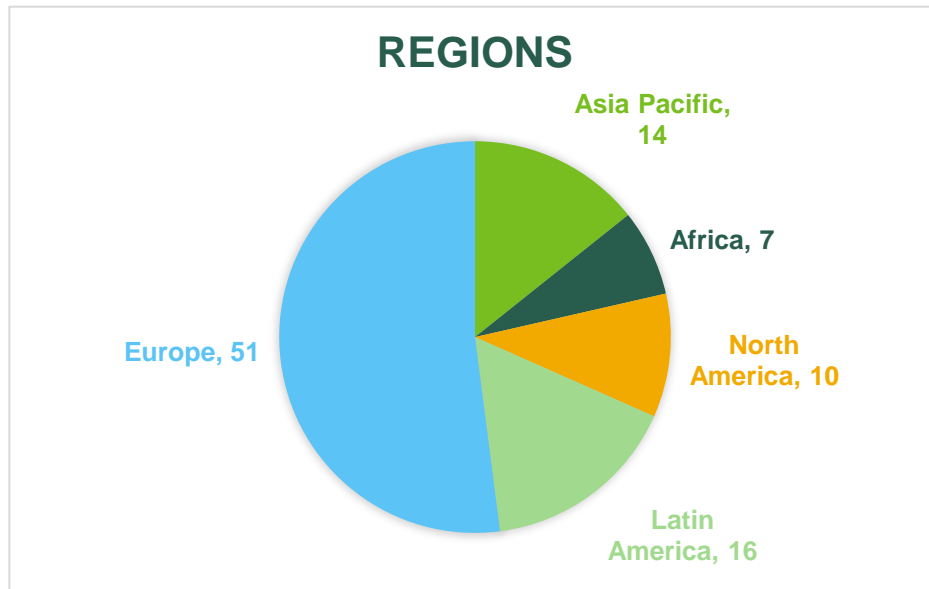
|     |                                  |
|-----|----------------------------------|
| ASI | Assurance Services International |
| CB  | Certification body               |
| CH  | Certificate holder               |
| CoC | Chain of custody                 |
| CW  | Controlled Wood                  |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

# CONTENTS

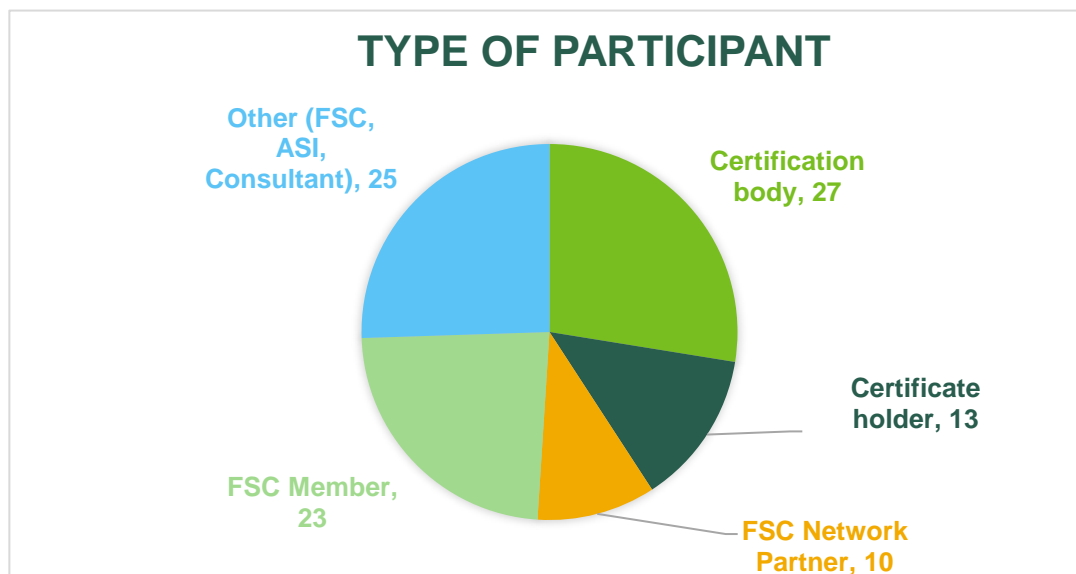
|   |           |
|---|-----------|
| <b>Introduction</b>   | <b>2</b>  |
| <b>Part 1.Participation in the Public consultation</b>  | <b>4</b>  |
| <b>Part 2.Methodology</b>   | <b>6</b>  |
| A. How to read quantitative results?  | 6         |
| <b>Part 3.Summary of comments and FSC feedback</b>  | <b>7</b>  |
| <b>FSC-STD-20-001 V5-0 Draft 2-0 General requirements for Certification bodies</b>                            | <b>8</b>  |
| Leading elements of the draft   | 8         |
| 1. Accreditation process  | 9         |
| 2. Accreditation scope  | 10        |
| 3. Conformity with ISO 17065 and relevant accreditation requirements  | 13        |
| 4. General requirements   | 14        |
| 5. Structural Requirements  | 16        |
| 6. Resource Requirement   | 17        |
| 7. Process Requirement  | 18        |
| 8. Management System Requirements   | 28        |
| Annex 1 Avoidance of conflict of interest   | 28        |
| Annex 2 Qualification requirements for Forest Management and Chain of Custody auditor candidates and auditors | 29        |
| Annex 3 Audit Teams   | 31        |
| Annex 4 Risk-based evaluation activities  | 32        |
| Annex 5 Closure of nonconformities (informative)  | 33        |
| Annex 6 Procedure for transfer of FSC certification and license agreement for FSC certification scheme        | 33        |
| <b>FSC-PRO-20-004 Auditor Training PRogramme</b>  | <b>35</b> |

# Part 1. Participation in the Public consultation

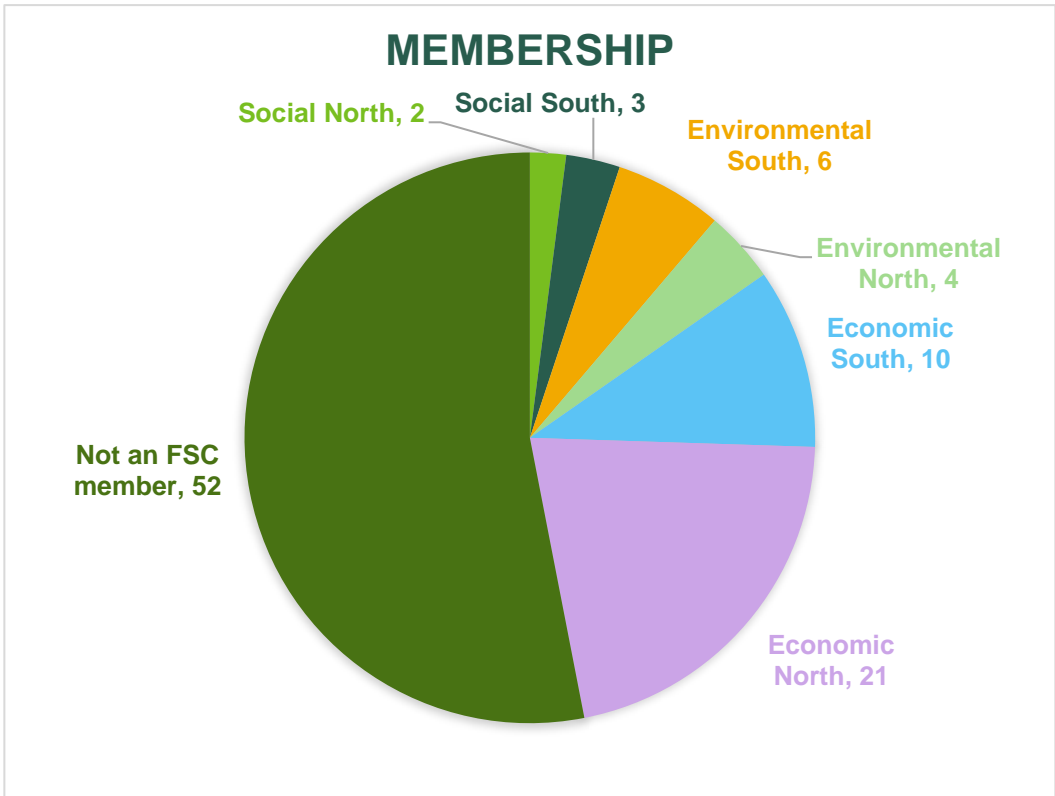
98 stakeholders provided feedback in the public consultation.



Most of the participants come from Europe, 51. Followed by Latin America, 16.



Most respondents belonged to “certification bodies” (27) participant type.



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

## Part 2. Methodology

Each section in the draft was 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 each section at least one open ended question was added (e.g. “do you have any other feedback to this section”) to provide stakeholders an opportunity to provide comments to the topics that might not have been addressed through the targeted questions.

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    | 1    |
| Agree             | 0.75 |
| Neutral           | 0.5  |
| Disagree          | 0.25 |
| 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 topic (requirements). Whereas numbers such as 78 or 40 means the percentage of the participants from the stakeholder group that agree with (or support) the topic (requirement). Similarly, 0 means that no participant from the stakeholder group agreed with (or support) the topic (requirement).

### 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 etc. The qualitative results present 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 draft sections/requirements presented in the public consultation. Each section presents: a) brief section/changes recap (as included in the consultation material), b) the quantitative analysis, and c) the qualitative analysis.

Table 1: List of consultation topics

| Consultation Topic  | Reference                      |
|---|--------------------------------|
| <b>FSC-STD-01-001 V5-0 Draft 2-0</b>                              |                                |
| Leading elements of the draft                                     | Introduction, scope, T&D, Ref. |
| Accreditation process   | Section 1                      |
| Accreditation scope   | Section 2                      |
| Conformity with ISO 17065 and relevant accreditation requirements | Section 3                      |
| General Requirements  | Section 4                      |
| Structural Requirements   | Section 5                      |
| Resource Requirement  | Section 6                      |
| Process Requirements  | Section 7                      |
| Management system requirements                                    | Section 8                      |
| Avoidance of conflict of interest                                 | Annex 1                        |
| Auditor Qualification   | Annex 2                        |
| Audit Team  | Annex 3                        |
| Risk-based approach   | Annex 4                        |
| Closure of the nonconformities flowchart (informative)            | Annex 5                        |
| Transfer of certification   | Annex 6                        |
| <b>FSC-PRO-20-005 V2-0 Draft 1-0</b>                              |                                |
| Auditor Training Programme  | FSC-PRO-20-004 V2-0 D1-0       |

# FSC-STD-20-001 V5-0 DRAFT 2-0 GENERAL REQUIREMENTS FOR CERTIFICATION BODIES

## Leading elements of the draft

Leading elements include the Introduction, Scope, and Terms and Definitions. These elements describe the objective of the document, general description of the FSC assurance system with reference to the impact of Regulation (EC) 765/2008 on Requirements for Accreditation and Market Surveillance and how to read the document with reference to ISO 17065:2012 Conformity assessment — Requirements for bodies certifying products, processes and services. The scope section in the leading elements specify to whom this standard applies.

The standard only presents the FSC specific requirements, any duplicative requirements from the ISO/IEC 17065:2012 are removed from the draft. To assist users in identifying the specified FSC requirements in relation to ISO/IEC 17065:2012, we are using the same section heading and numbering from section 4 'General requirements' onward.

**Q1. Is the structure and content of the leading elements clear and easy to follow?**

**Q2. Are section headings names and numbering clear and easy to follow with reference to the ISO/IEC 17065:2012?**

### Quantitative

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

| Question | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q1       | 61                 | 73                 | 73                         | 67                           | 53                  |
| Q2       | 58                 | 70                 | 68                         | 71                           | 50                  |

### Qualitative

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| <b>Agree</b>   |   |
| It is good that the structure and headings of the standard is aligned with ISO/IEC 17065:2012. It is easy to understand and follow FSC requirements and alignment with ISO/IEC 17065:2012. | Structure and headings of the standard is aligned with ISO/IEC 17065:2012 to make it easier for users to identify FSC requirements and the requirements of ISO/IEC 17065:2012.                            |
| The distinction made to clarify the FSC additional requirement and FSC requirements on top of existing ISO/IEC 17065:2012 is not so clear.   | The distinction between two types of requirements is now further clarified in the standard as 'an additional FSC requirement' and 'a requirement related to the existing ISO/IEC 17065:2012 requirement'. |
| <b>Disagree</b>  |   |



|   |   |
|---|---|
| a) Distinction between the term 'correction' and 'corrective action' is not so clear.   | The terms 'correction' and 'corrective action' is now further clarified.  |
| b) Many stakeholders do not have access to ISO/IEC 17065:2012, requirements from ISO standard should also be included for transparency.   | <p>The relevant ISO requirements cannot be included due to copy right issue. Therefore, to make it easier for users to identify those requirements a reference is added at the end of each requirement to identify whether it is 'an additional FSC requirement' and 'a requirement related to the existing ISO/IEC 17065:2012 requirement'.</p> <p>FSC will also produce guidance documents as part of publication and implementation of this standard to help stakeholder understand both FSC and ISO requirements.</p>   |
| c) Other than specifying ISO/IEC 17065:2012 requirements, changes which come from the EU regulation regarding ISO 17065, national accreditation body and other through alignment with other ISO documents should also be marked in the standard and impact of the changes should be fully assessed. | <p>The key change triggered by EC regulation 765/2008 is to align with ISO/IEC 17065:2012 and the functional approach on which the process requirement of ISO/IEC 17065:2012 are based. As FSC requires only to conform with ISO/IEC 17065:2012 therefore adding reference to other ISO standards would create confusion in implementation of the standard.</p> <p>Regarding assessing the impact of the changes, FSC has conducted a focused consultation, a public consultation, testing of both Draft 1-0 and Draft 2-0 and review of proposals/changes by relevant experts.</p> |

## Other

|  |   |
|--|---|
| Changes introduced to the system to close nonconformities has a major impact on certification bodies therefore suggest having 24 months transition period. | Feedback on the topic of closing nonconformity is reviewed and requirements are amended to keep the change as minimum as possible while still ensuring the full alignment with ISO/IEC 17065:2012. Therefore, the regular transition period as per FSC procedures is kept. FSC will actively engage with certification bodies, conduct webinars, and produce guidance documents to help certification bodies understand the change. |
|--|---|

## 1. Accreditation process

This section includes the requirements of the accreditation process for certification bodies operating within European Economic Area and United Kingdom and outside.

### Q3. Do you agree with requirements included in the accreditation process section?

#### Quantitative

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

| Question | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q3       | 64                 | 61                 | 75                         | 73                           | 75                  |

## Qualitative

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

### Agree

Accreditation process is clear and link to ASI procedure is helpful.

No comment

### Disagree

As ASI is not an accreditation body anymore which accreditation body clause 1.2 refers to?

The clause refers to both ASI and relevant participating accreditation body (where applicable). The clause is amended to clarify the intent.

ASI is FSCs' global assurance provider and accreditation body for certification bodies based outside EEA and UK. The accreditation process for any certification body is presented in [ASI-PRO-20-126-TTAP ASI Two-Tier Assurance Procedure](#).

### Other

What additional requirements a national accreditation body may have, and is it ensured that the requirements are implemented consistently by the national accreditation bodies?

The requirement is amended to clarify that the accreditation body and/or ASI may have additional requirements. They may ask for additional evidence or requirements to grant or maintain an accreditation. Regarding consistency in implementation of FSC requirements, national accreditation bodies established as per EC regulation 765/2008 are in exchange with each other but consistent implementation of the requirements is beyond the scope of this revision process.

## 2. Accreditation scope

This section includes the requirements for certification bodies to define their accreditation scope. The accreditation scope of a certification body is based on two components a) technical scope and b) geographical scope. There are four (4) key changes introduced in this section:

- I. withdrawal of option to exclude controlled forest management from forest management accreditation scope. This is because the revised version of [FSC-STD-30-010 FSC Controlled Wood Standard for Forest Management](#) is a subset of [FSC-STD-60-004 FSC International Generic Indicators](#) and will be evaluated by standard [FSC-STD-20-007 Forest Management Evaluations](#). In addition to this change, ASI will also be phasing out the controlled wood (CW)

CoC optional scope following the alignment between FSC and ASI as CW is a mandatory part of CoC accreditation scope;

- II. introduction of mandatory and optional certification standards within technical accreditation scope;
- III. introduction of geographical scope;
- IV. requirement for voluntary change in certification body's accreditation scope.

**Q4. Do you agree with the change of withdrawal of option to exclude the controlled forest management from forest management accreditation scope (Clause 2.2)?**

**Q5. Do you agree with the requirement of mandatory and optional certification standards as part of the technical accreditation scope? (Clause 2.3)?**

**Q6. Do you agree with the requirement for introducing the geographical scope as part of accreditation scope (Clause 2.4)?**

**Q7. Do you agree with applying the requirements for change of accreditation scope by ASI to the cases where certification bodies voluntary ask for a change in accreditation scope (Clause 2.5)?**

**Q8. Do you have any other feedback regarding this section?**

### Quantitative

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q4        | 59                 | 52                 | 73                         | 64                           | 64                  |
| Q5        | 66                 | 56                 | 75                         | 70                           | 80                  |
| Q6        | 75                 | 56                 | 75                         | 73                           | 75                  |
| Q7        | 50                 | 66                 | 71                         | 73                           | 71                  |

### Qualitative

| Key Stakeholder Feedback  | FSC comment  |
|---|--|
| <b>Agree</b>  |  |
| a) Agree with making the CFM and CW as mandatory part of the accreditation. This makes the scope of accreditation clearer and more consistent.                                    | No comment   |
| b) Agree with having the geographical scope and it is also already implemented by ASI. However, a clarity is needed how scope extension and reduction would work?                 | Change of scope requirements are applicable as defined by ASI and it is also the discretion of ASI to conclude on the geographical scope (worldwide/country specific) based on the ASI requirements for accreditation process (scope extension/reduction). |
| <b>Disagree</b>   |  |
| a) Agree with making CFM as mandatory part of accreditation but disagree with including CW as mandatory part of CoC accreditation. As it would require CoC accredited CBs to also | CW was always a mandatory part of the CoC accreditation (see current version of CB   |

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have an FM auditor. Alternatively, all scope options should be kept open. Let CBs decide to choose the scope of accreditation based on the available resources. It will be easier for CBs to keep them as optional as the number of CH applying for these standards is usually far less than the ones applying for the conventional standards.

standard). CW is an integral part of the CoC and therefore cannot be kept as optional element. Regarding FM auditor: for CW audits an FM auditor is only required when auditing at Management Unit level (clarified in Annex 3 of the CB standard).

Options for accreditation scope are now presented in Figure 1 of the CB standard. Accreditation standards that are connected to each other and require a similar level of competencies are merged under one accreditation scope. The combination also reflects FSCs policy perspective on which standards should be allowed to be optional or not. As regards to controlled forest management: auditing controlled forest management is a subset of the full IGI, approx. 70% of the International Generic Indicators apply and will be audited as per standard FSC-STD-20-007.

CBs are required to demonstrate their systems according to the accreditation scope and the implementation of the system for the clients for those certifications.

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b) Disagree with geographical scope requirement as it may limit the CBs operations and worldwide scope cannot be maintained.

The geographical scope requirement is already implemented by ASI. Regarding the scope it is the discretion of ASI to conclude on the geographical scope (worldwide/country specific) based on the ASI requirements for accreditation process, including but not limited to resources available and evidence for conformity with FSC requirements. This alignment of requirements with ASI would also allow ASI to reduce or extend the scope of accreditation while maintaining the core accreditation where applicable.

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c) CBs should not be allowed to change the scope of accreditation (geographical scope) voluntarily and if they do then the affected clients shall be informed with 7 days instead of 30 days.

CBs may ask for a voluntary reduction of their geographical or technical accreditation scope, for example, due to lack of auditor, human resource or any other business decision. In such cases FSC requires:

- A) CB informs the affected clients within 30 days
- B) Affected clients will have 6 months from the change in scope to find a new CB.

As affected clients will have 6 months to find a new CB therefore reducing the time for notification from 30 days to 7 days may not add value and may have implementation challenges for CBs.

### Other

Regulatory module requirements should also be added to the accreditation map.

Relevant requirements are not added as an addendum to the relevant certification and accreditation standards. References to the addendums are now added to the accreditation map (Figure 1 of the CB standard).

## 3. Conformity with ISO 17065 and relevant accreditation requirements

This section includes the requirements that a certification body needs to fulfil, to obtain and to maintain its accreditation status. The key change introduced in this section is that it is mandatory for all FSC-accredited certification bodies to conform with ISO/IEC 17065:2012. This made it necessary for FSC to also align FSC specific requirements with ISO/IEC 17065:2012. This key change is the outcome of the implementation of Regulation (EC) 765/2008 on Requirements for Accreditation and Market Surveillance at the European Economic Area (EEA) and at the United Kingdom (UK) level and FSC needs to adapt its requirements in order to operate within EEA and UK.

**Q9. Do you agree with the requirements included in this section?**

**Q10. Do you have any other feedback regarding this section?**

### Quantitative

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q9        | 61                 | 67                 | 63                         | 75                           | 75                  |

### Qualitative

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| <b>Agree</b>   |   |
| Agree with the requirement included in section 3 and they are clear except for the part what additional requirements an accreditation body may have? | For additional requirements by an accreditation body please see FSC comment to 1 Accreditation process.FSC-STD-20-001 V5-0 Draft 2-0 including FSC-PRO-20-003 V2-0 Draft 1-0 as Annex 6 |
| <b>Disagree</b>  |   |
| Disagree with accreditation body applying additional requirements to certification bodies.   | Please see FSC comment to 1 Accreditation process.  |

| Key Stakeholder Feedback   | FSC comment  |
|--|--|
| <b>Other</b>   |  |
| a) Accreditation requirement should also require the certification bodies to have the team of auditors trained on social aspects to audit forest management certification. | Annex 3 of the standard includes the competency requirements of an audit team. |
| b) Only listing FSC specific requirements and not including duplicating ISO/IEC 17065:2012 requirements lead to lower the transparency and implementation challenges.      | Please see FSC comment to 'Leading elements of the draft'.                     |

#### 4. General requirements

This section includes the requirements for legal and contractual matters, management of impartiality, liability and financing, non-discriminatory conditions, confidentiality, and publicly available information.

Key change in this section is that the duplicative requirements from ISO/IEC 17065:2012 are removed.

**Q11. Do you agree with the removal of requirements from section 4.1?**

**Q12. Do you agree with the applicability of the ISO/IEC 17065:2012 requirement to section 4.1?**

**Q13. Do you agree with the removal of requirements from section 4.2?**

**Q14. Do you agree with the applicability of the ISO/IEC 17065:2012 requirements to section 4.2?**

**Q15. Do you agree with the removal of requirements from section 4.3?**

**Q16. Do you agree with the applicability of the ISO/IEC 17065:2012 requirements to section 4.3?**

**Q17. Do you agree with the removal of requirement from section 4.4?**

**Q18. Do you agree with the applicability of the ISO/IEC 17065:2012 requirement to section 4.4?**

**Q19. Do you agree with the removal of requirement from section 4.5?**

**Q20. Do you agree with the applicability of the ISO/IEC 17065:2012 requirement to section 4.5?**

**Q21. Do you agree with the removal of requirement from section 4.6?**

**Q22. Do you agree with the applicability of the ISO/IEC 17065:2012 requirement to section 4.6?**

**Q23. Do you have any other feedback regarding this section?**

#### Quantitative

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q11       | 63                 | 71                 | 50                         | 58                           | 58                  |
| Q12       | 61                 | 69                 | 50                         | 70                           | 75                  |
| Q13       | 63                 | 67                 | 50                         | 63                           | 58                  |
| Q14       | 63                 | 60                 | 60                         | 69                           | 81                  |
| Q15       | 68                 | 68                 | 50                         | 59                           | 50                  |
| Q16       | 65                 | 66                 | 60                         | 66                           | 75                  |
| Q17       | 68                 | 67                 | 43                         | 58                           | 54                  |

|     |    |    |    |    |    |
|-----|----|----|----|----|----|
| Q18 | 67 | 73 | 60 | 66 | 75 |
| Q19 | 64 | 62 | 50 | 61 | 50 |
| Q20 | 71 | 59 | 45 | 69 | 75 |
| Q21 | 64 | 65 | 50 | 65 | 54 |
| Q22 | 60 | 70 | 60 | 73 | 63 |

## Qualitative

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| <b>Agree</b>   |   |
| a) Agree to keep only FSC specific requirement in the standard as it makes the document clear. Additional clarity is needed that duplicating requirements still applies to certification bodies.                                 | The clause 3.2 sets the requirement that the conformity to ISO/IEC 17065:2012 is mandatory. In addition, the reference to sentence [No additional requirements to ISO/IEC 17065:2012 for this section]. is amended in each section to clarify that listed requirements in the CB standard are additional to ISO/IEC 17065:2012.   |
| b) Agree with FSC additional requirements to ISO/IEC 17065:2012 for 'consultancy and 'conflict of interest'.   | No comment  |
| c) Agree with keeping the requirements for publicly available information as it will strengthen the FSC system.  | No comment  |
| <b>Disagree</b>  |   |
| a) Disagree to remove the duplicating ISO/IEC 17065:2012 from the standard and not to add ISO/IEC 17065:2012 in the CB standard as it lacks the transparency.  | Please see FSC comment to 'Leading elements of the draft'.  |
| b) Consultancy requirements should be clarified whether a consultancy disqualify a person to audit, review and make certification decision. Second, what if the conflict of interest still exists following a three-year period. | The relevant requirement is clarified, and consultancy only disqualifies a person to audit, review, make certification decision and to resolve a complaint for the same organization to whom the consultancy has been provided.<br><br>The three-year period is a minimum specified period and conflict of interest requirements still applies to persons within and beyond the three-year period. The relevant clause is amended to clarify the intent of the requirement. |
| c) Requiring certification bodies to translate the complaints and appeal procedure into local languages is beneficial for forest management clients but not so valuable for chain of custody clients.                            | This is not a new requirement, and it already exist in the current version of CB standard. FSC intends to maintain this requirement for both forest management and chain of custody to ensure all affected stakeholders gets equal opportunity to register complaints in the FSC system.  |

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

**Other**

|   |  |
|---|--|
| ISO/IEC 17065:2012 requires the information to be made available only upon request whereas FSC requirement specify that the information shall be made available on website. How should a certification body implement both ISO and FSC requirement. | The elements that ISO/IEC 17065:2012 requires to be made available on request are different from FSC elements except for complaints and appeals procedures where FSC requirements are stricter than the ISO requirement. Therefore, for availability of complaints and appeal procedure FSC requirement applies and for other elements both FSC and ISO requirements are applicable. |
|---|--|

### 5. Structural Requirements

This section includes the requirements for certification body’s organizational structure and for mechanism for safeguarding impartiality. The key change in this section is that the duplicative requirements from ISO/IEC 17065:2012 are removed.

**Q24. Do you agree with the removal of requirements from section 5?**

**Q25. Do you agree with the applicability of the ISO/IEC 17065:2012 requirement to section 5?**

**Q26. Do you have any other feedback regarding this section?**

**Quantitative**

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q24       | 61                 | 67                 | 54                         | 58                           | 58                  |
| Q25       | 54                 | 73                 | 60                         | 70                           | 70                  |

**Qualitative**

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

**Agree**

|   |  |
|---|--|
| Agree to only listing FSC specific requirements and not including duplicating ISO/IEC 17065:2012 however this leads to lower the transparency and increase the implementation challenges. | Please see FSC comment to ‘Leading elements of the draft’. |
|---|--|

**Disagree**

|  |  |
|--|--|
| Disagree to only listing FSC specific requirements and not including duplicating ISO/IEC 17065:2012 however this leads to lower the transparency and increase the implementation challenges. | Please see FSC comment to ‘Leading elements of the draft’. |
|--|--|



## 6. Resource Requirement

This section includes the requirements for certification body personnel involved in the certification process and the resources for evaluation. Key change in this section is the alignment with ISO/IEC 17065:2012 which means FSC listed requirement in addition to and on top of ISO/IEC 17065:2012. Where no additional requirements are listed, the requirements from ISO/IEC 17065:2012 apply as they are.

**Q27. Do you agree with the FSC requirements and applicability of the ISO/IEC 17065:2012 requirement to section 6.1?**

**Q28. Do you agree with the FSC requirements and applicability of the ISO/IEC 17065:2012 requirement to section 6.2?**

**Q29. Do you agree with the removal of requirement from section 6.2?**

**Q30. Do you have any other feedback regarding this section?**

### Quantitative

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q27       | 68                 | 61                 | 45                         | 73                           | 81                  |
| Q28       | 68                 | 70                 | 60                         | 70                           | 75                  |
| Q29       | 71                 | 64                 | 40                         | 63                           | 58                  |

### Qualitative

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| <b>Agree</b>   |   |
| Agree with the requirement of Section 6.   | No comment  |
| <b>Disagree</b>  |   |
| Disagree to only listing FSC specific requirements and not including duplicating ISO/IEC 17065:2012 however this leads to lower the transparency and increase the implementation challenges. | Please see FSC comment to 'Leading elements of the draft'.  |
| <b>Other</b>   |   |
| a) Clarity is needed that whether the requirement of witness audit applies to the auditors of affiliate office of the certification body.  | The requirement of witness audit of auditors applies to both certification body and to the body providing outsourced services. Clarity is added in Clause 6.2.2.2 of the standard with regards to whether work done by an affiliate office is considered outsourcing. |
| b) Clarity is needed to sanction the auditors that are not performing or involved in fraudulent activities.  | Requirements are added in the standard to clarify the cases when an auditor qualification shall be suspended (See Clause 6.1.2.8 – 6.1.2.9).  |

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| c) Does hiring of external personal is now considered outsourcing, as standard does not provide any reference to it? | Use of external personnel under contract is not outsourcing. This is clarified in the ISO/IEC 17065:2012 Clause 6.2.2.1 therefore it is not repeated in FSC standard. |

## 7. Process Requirement

This section includes the overall requirements for a certification process, starting from application until making the certification decision and registering the certified product and relevant data on FSC certification database. This section also includes the requirements for maintaining the records for certification activities and handling complaints and appeals.

Key change in this section is the alignment with the elements of the functional approach as presented in [ISO/IEC 17000:2020 Conformity assessment — Vocabulary and general principles](#). The elements of the functional approach include selection, determination (audit), review of evaluation results, certification decision and certification. In addition to the alignment with the functional approach ([ISO/IEC 17000:2020](#)), this section is also aligned with [ISO/IEC 17065:2012](#).

[ISO/IEC 17065:2012](#) requires that nonconformities have been corrected before a certification decision is taken, including the decision to grant certification as well as to maintain certification following a surveillance evaluation (see also [ISO 17067:2013 Conformity assessment — Fundamentals of product certification and guidelines for product certification schemes](#), Table 1). In the process to obtain system acceptance in the European Economic Area by the German national accreditation body DAkkS, FSC is applying to be accepted as a 'scheme type 6' as per [ISO 17067:2013](#) for the certification of processes.

This section also presents changes to strengthen the integrity of the system and to ensure an effective certification process. The changes include:

- A) List of minimum information that certification body obtains from applicants (ref. section 7.2).
- B) Closure of nonconformities is changed to applying 'corrections' and implementing 'corrective actions' where 'correction action' is only required for major nonconformities (ref. Terms and Definitions, clause 7.4.11).
- C) Timeline to close nonconformities for main evaluation: before the certification decision and certification cannot be granted with open minor and major nonconformities (ref. clause 7.4.12).
- D) Timeline to close nonconformities for surveillance: 3 months from audit closing meeting to apply corrections and 15 months from audit closing meeting to implement any corrective actions (ref. clause 7.4.12).
- E) FSC proposed changes to the requirements to close nonconformities in a surveillance evaluation:
- F) Duplicative requirements from [ISO/IEC 17065:2012](#) are removed from section 7.5 review.
- G) Timeline for certification decision for surveillance evaluation is added as 3 months from the audit closing meeting and 30 days in case of 5 or more major nonconformities (ref. clause 7.6.2).
- H) FSC certification document is a formal certification document and additional element to the certification scope and statement of certification is added (ref. clause 7.7.1 to 7.7.9)
- I) 15 months rule for chain of custody surveillance evaluation is amended to once per calendar year (ref. clause 7.9.1)
- J) No maintenance of certification with open nonconformities (ref. 7.9.3)
- K) Requirements to change the scope of certification are clarified by adding clarity to conduct an audit and signing of TLA according to the operation model (single, multi-site, group) (ref. clause 7.11.2)

- L) Requirement to notify clients 6 months in advance in cases of terminating all clients in a specific country or region and requirement to suspend certification where receiving evidence from FSC or ASI of a breach of certification contract by the client (ref. clause 7.11.4)
- M) Under complaints and appeals section, a reference to handling vexatious and persistent complaints is added and a requirement for certification body to submit annual overview summary of to FSC is added. A template to annual over summary of complaints is prepared and attached to this consultation for feedback (ref. 7.13.2 and 7.13.3).

As this is a section includes a longer list of the changes to the draft therefore the consultation results are presented in groups of subsections.

**Subsection: General, application and application review**

**Q31. Do you agree with the requirements included in 7.1 General?**

**Q32. Do you agree with the requirements included in 7.2 Application and with FSC specified requirement for collection of information?**

**Quantitative**

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q31       | 61                 | 71                 | 72                         | 72                           | 65                  |
| Q32       | 71                 | 67                 | 75                         | 67                           | 67                  |

**Qualitative**

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| <b>Agree</b>   |   |
| Agree with the requirements.   | No comment  |
| <b>Disagree</b>  |   |
| No comment   | No comment  |
| <b>Other</b>   |   |
| a) A clause to clarify that for an enquiry and an interpretation request under review by FSC, the relevant nonconformity can be put on hold and the timeline for closing the nonconformity does not apply. FSC also clarifies the nonconformity timeline in case of appeal against identified nonconformity. | FSC allows certification bodies to have an interim interpretation in the absence of a published formal interpretation. See section 6 of PSU Enquiry Procedure PSU-PRO-10-201 for reference. Therefore, the timeline to close an identified nonconformity does not change in this case.<br><br>Regarding appeals, it can be made to the certification decision (See Section C of the standard. Therefore, the timeline to close an identified nonconformity does not change. |

| Key Stakeholder Feedback  | FSC comment   |
|---|---|
| b) A clarity to the derogation process for derogation to an accreditation requirement and a derogation to certification requirement is suggested. | Certification bodies can request a derogation to a FSC normative requirement following the process and template provided in <Enquiry Procedure PSU-PRO-10-201>. The relevant clause in the standard is now amended to clarify that it applies to both accreditation and certification requirements. |
| c) The list of information to be collected at application level does not reflect some elements that may be required to collect.                   | The intent of clause 7.2.1 is to provide the list of minimum information that would help certification body to further specify the scope of application for certification which will lead to asking for a specific information to prepare for evaluation.   |

### Subsection: Evaluation

**Q33. Do you agree with the requirements for the closure of nonconformities (ref. clause 7.4.6 onwards)?**

**Q34. Do you agree with the proposed changes (alternative) to the requirements for the closure of nonconformities in a surveillance evaluation as added in the consultation?**

**Q35. Do you think the timelines to close the nonconformities for both FM and CoC are viable? If not, please provide examples)?**

**Q36. Do you agree with the requirements included in 7.4 Evaluation (apart from feedback to 7.4.6 onwards)?**

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q33       | 34                 | 46                 | 34                         | 47                           | 43                  |
| Q34       | 34                 | 46                 | 33                         | 56                           | 36                  |
| Q36       | 50                 | 58                 | 56                         | 58                           | 54                  |

### Qualitative

| Key Stakeholder Feedback   | FSC comment  |
|--|--|
| <b>Agree</b>   |  |
| a) It would require CB to improve its internal procedure, but the new timelines are feasible.                  | Corrective action for a major nonconformity is required to be implemented before the certification decision. |
| b) Corrective action timeline should be kept as 15 months or next surveillance evaluation whichever is closer. | Corrective action for minor can be implemented until next surveillance evaluation.                           |
| c) Timelines are feasible to implement but there may be some exceptions.                                       |  |

| Key Stakeholder Feedback  | FSC comment  |
|---|--|
| <b>Disagree</b>   |  |
| a) Increase audit cost (verifications, reviews, approval and monitoring for one NC).  | The new system is almost the same as the existing system for closing a nonconformity except for the following two additions:   |
| c) Increase workload both on CB and CH to close NC in 3 months (surveillance evaluation) and effect the capacity of the auditor.          | a) Correction for a minor nonconformity is to be implemented before the certification decision.<br>b) Certification cannot be maintained with open minor nonconformities (Note the minor nonconformity can be closed by implementing correction. Corrective action can be implemented until next surveillance).  |
| d) Complex system: as different timeline applies for correction and corrective actions  | The same timeline applies to the correction and corrective action. Only for minor nonconformity the corrective action can be implemented until next surveillance evaluation.   |
| e) Lower the integrity: minor will be raised as observation.  | Correction action is now also required for a minor nonconformity and the corrective action for majors are now required to implemented before the certification decision.   |
| f) No corrective action for minor and 15 months' time for corrective action for major will affect the credibility of the system.          | Please see the Annex 5 in the standard for overview of closure of nonconformities in FSC system.   |
| g) PEFC, SURE, REDcert and others are also ISO 17065 based and allow longer timeline for Minor NCs.                                       |  |
| <b>Other</b>  |  |
| a) Clarify the difference between 'correction' and 'corrective action'.   | Both terms are now clarified in the standard.  |
| b) 1 month is too short to share the nonconformity report (technical review, auditors' availability, need for more information/evidence). | Instead of requiring a Nonconformity report in 1 month from closing, FSC now requires sharing of the preliminary evaluation report including documented nonconformities, within 3 months from the audit closing meeting.   |
| c) Time to close a nonconformity should start from sharing of report and not from the closing meeting.                                    | It is on the organization to either chose to implement the corrections and corrective actions: 1. from the day when they hear about the nonconformities in the closing meeting or 2. when they receive the preliminary evaluation report with the documented nonconformities. The time to close a nonconformity ends with the certification decision timeline for both main and surveillance evaluation. |

| Key Stakeholder Feedback  | FSC comment  |
|---|--|
| d) If CH appeal against a nonconformity, then the timeline to apply correction should change or should be suspend.  | Only a certification decision can be appealed (See Section C of the standard. Therefore, the timeline to close an identified nonconformity does not change.  |
| e) Minor should also have corrective action as some minor can only be closed by implementing corrective action.   | Corrective action is also introduced for minor nonconformities. Corrective action for minor can be implemented until next surveillance.  |
| f) Guidance on cases where correction may not be possible within 3/4months (e.g. season dependency, resources available, large group certifications, wrong tree cut, water polluted). | The term correction is now clarified as 'immediate action to eliminate or correct a nonconformity. Intent of the correction is to take immediate action either to correct the nonconformity or to stop the activity that has led to the nonconformity.   |
| g) Minor should not lead to suspension especially for circumstances that are beyond the control of a CB and its client.   | Minor nonconformity will only lead to suspension if the correction for a minor nonconformity has not been implemented before the certification decision. Whereas for correction action for minor can be implemented until next surveillance. If the correction action for a minor nonconformity is not closed in next surveillance, then it shall lead to a major nonconformity. |
| h) Timeline for corrective action for major should be reduced from 15 months (as it affected the credibility of the system).  | Both correction and corrective action for a major nonconformity are now required to be closed before the certification decision.   |
| i) Set also a mechanism to raise observation to minor.  | Observation cannot be raised as a minor nonconformity unless it constitutes a nonconformity.   |
| j) Re-evaluation should not be treated as main evaluation.  | Time for closing a nonconformity and making certification decision at re-evaluation is considered now the same as the timeline for surveillance evaluation.  |

### Subsection: Review and Certification decision

**Q37. Do you agree with the requirements included in 7.5 Review?**

**Q38. Do you agree with the requirements for making certification decisions including certification decision timeline included in 7.6 Certification decision?**

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q37       | 54                 | 56                 | 64                         | 72                           | 54                  |
| Q38       | 58                 | 48                 | 43                         | 64                           | 57                  |

## Qualitative

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| <b>Agree</b>   |   |
| Agree with requirement for review and certification decision.  | No comment  |
| <b>Disagree</b>  |   |
| a) Disagree with the timeline to close all nonconformities.  | Please see FSC comments to the subsection 'Evaluation'.   |
| b) Remove peer review requirements for FM evaluation reports and only require it for high-risk countries.                        | Peer review requirements are important to ensure the quality and credibility of the evaluation results. Peer review requirements are now moved to the forest management standard for certification bodies FSC-STD-20-007.   |
| c) The organization should also get a report to review before the final report.  | As per new requirements, certification body shall submit a preliminary evaluation report including the documented nonconformities with the organization. The organization can use this opportunity to provide its input to the report as the final report will be sent together with the certification decision according to the certification decision timeline. |
| d) There will be implementation challenges to require all nonconformities to close before the certification decision.            | As per the updated requirements for closing nonconformities in the FSC system, the only new addition is that the correction for minor nonconformities is also required before the certification decision. This is an important element to align the FSC system with ISO 17065 requirements.   |
| e) Mandatory suspension with 3 major nonconformities and extension of timeline for certification decision should not be allowed. | In case of 5 or more major nonconformities, the certification decision shall be taken within 30 days from the audit closing meeting. For surveillance evaluation, a certification decision shall be taken within 6 months from the closing meeting and if the decision cannot be taken then the certification shall be suspended.                                 |
| f) Decision to maintain the certification should also consider the nonconformities identified between the audits.                | Yes, it is considered. The timeline to close these nonconformities and make certification decision is the same as for the nonconformities identified during a surveillance evaluation, see Clause 7.6.2 d) in the standard.   |

| Key Stakeholder Feedback  | FSC comment  |
|---|--|
| <b>Other</b>  |  |
| a) Clarify the difference between 'correction' and 'corrective action'.   | Both terms are now clarified in the standard.  |
| b) 1 month is too short to share the nonconformity report (technical review, auditors' availability, need for more information/evidence).   | Instead of requiring a Nonconformity report in 1 month from the audit closing meeting, FSC now requires sharing of the preliminary evaluation report including documented nonconformities, within 3 months from the closing meeting.   |
| c) Time to close a nonconformity should start from sharing of report and not from the closing meeting.  | It is on the organization to either chose to implement the corrections and corrective actions: 1. from the day when they hear about the nonconformities in the closing meeting or 2. when they receive the preliminary evaluation report with the documented nonconformities. The time to close a nonconformity ends with the certification decision timeline for both main and surveillance evaluation. |
| d) If CH appeal against a nonconformity, then the timeline to apply correction should change or should be suspend.  | Only a certification decision can be appealed (See Section C of the standard. Therefore, timeline to close an identified nonconformity does not change.  |
| e) Minor should also have corrective action as some minor can only be closed by implementing corrective action.   | Corrective action is also introduced for minor nonconformities. Corrective action for minor can be implemented until next surveillance.  |
| f) Guidance on cases where correction may not be possible within 3/4months (e.g. season dependency, resources available, large group certifications, wrong tree cut, water polluted). | Term correction is now clarified as 'immediate action to eliminate or correct a nonconformity. Intent of the correction is to take immediate action either to correct the nonconformity or to stop the activity that has led to the nonconformity.   |
| g) Minor should not lead to suspension especially for circumstances that are beyond the control of a CB and its client.   | Minor nonconformity will only lead to suspension if the correction for a minor nonconformity has not been implemented before the certification decision. Whereas for correction action for minor can be implemented until next surveillance. If the corrective action for a minor nonconformity is not closed in the next surveillance, then it shall lead to a major nonconformity.                     |
| h) Timeline for corrective action for major should be reduced from 15 months (as it affected the credibility of the system).  | Both correction and corrective action for a major nonconformity are now required to be closed before the certification decision.   |



| Key Stakeholder Feedback                                   | FSC comment   |
|--|---|
| i) Set also a mechanism to raise observation to minor.     | An observation cannot be raised as a minor nonconformity unless it constitutes a nonconformity.   |
| j) Re-evaluation should not be treated as main evaluation. | Time for closing a nonconformity and making certification decision at re-evaluation is considered now the same as the timeline for surveillance evaluation. |

### Subsection: Certification documentation, directory of certified products and surveillance

**Q39. Do you agree with the requirements for certification documentation including statement of certification included in 7.7 Certification documentation and 7.8 Directory of certified product?**

**Q40. Do you agree with the requirements for surveillance frequency and not maintaining certification with open nonconformities included in 7.9 Surveillance?**

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q39       | 61                 | 60                 | 61                         | 56                           | 70                  |
| Q40       | 47                 | 52                 | 38                         | 53                           | 65                  |

### Qualitative

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| <b>Agree</b>   |   |
| Agree with the requirements for certification documentation and directory of certified products.     | No comment  |
| <b>Disagree</b>  |   |
| a) Clarification regarding issuance of paper certificate is needed.                                  | Clause 7.7.3 in the standard clarifies that issuing of a paper certificate is optional. Requirements are also listed for the mandatory content of paper certificate if issued.              |
| b) Certification statement if needed can only be kept in paper certificates and not in the database. | Certification statements are mandatory for FSC the certification database and FSC will provide a drop-down list of the statements per certification type on the FSC certification database. |
| c) Version number of normative documents should not be required to omit.                             | Version numbers are mandatory for FSC certification database as it is main certification document. Version numbers can only be omitted from the paper certificate.                          |

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| d) Frequency of audit should also be accepted to reduce where there is low risk. | No, minimum audit frequency shall be maintained as specified by FSC.<br>Timeline for surveillance evaluation is now included in the relevant forest management and chain of custody standards for certification bodies. |

**Subsection: Changes affecting the certification and Termination, reduction, suspension or withdrawal of certification**

**Q41. Do you agree with the requirements for changes in the scope of certification (clause 7.11.2), giving 6 months' notice to clients (clause 7.11.4) and other as included in 7.11 Termination, reduction...of certification?**

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q41       | 46                 | 47                 | 53                         | 66                           | 75                  |

**Qualitative**

| Key Stakeholder Feedback   | FSC comment  |
|--|--|
| <b>Agree</b>   |  |
| No comments  | No comment   |
| <b>Disagree</b>  |  |
| a) Disagree with the suspension with open minor nonconformities for timeline to make certification decision.   | See FSC comments to subsections 'Evaluation' and 'Certification Decision' above.   |
| b) Timeline to inform the CHs about changes in the requirements should be reduced 7 days and it shall include the general description of the change. | 30 days' timeline is appropriate, on top of this FSC also notifies the relevant CHs about the changes in normative framework.  |
| c) Requirement to inform CH about changes should be removed.   | This requirement is about both changes in the FSC system and resultant changes in CBs system (policy, procedure etc.). Therefore, it would be good to keep it. FSC also communicates the summary of changes and CB can potentially use that FSC summary to pass it on their clients. |
| d) Notice to clients before terminating them all in a country should be 12 months not 6 months.  | This may not work well with the planning of CB intending to a leave market in a country or a region. The 6 months' timeline is aligned with the cases where the accreditation of a certification   |

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

body is terminated and affected certificate holders have 6 months to find a new CB.

- |   |   |
|---|---|
| e) Requirement to reinstate the certification after suspension are not valid as timeline to apply corrective action is max 15 months whereas max suspension time is 12 months | Requirements are amended, the timeline to implement the correction and corrective action for major is before the certification decision. For a minor nonconformity the correction is a requirement to be implemented before the certification decision and for correction action the timeline is until the next surveillance. |
|---|---|

### Subsection: Complaints and appeals

**Q42. Do you agree with the requirements included in 7.13 Complaints and appeals?**

**Q43. Do you have any feedback to the template for submitting annual overview of complaints to FSC?**

**Q44. Do you have any other feedback regarding section 7?**

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q41       | 46                 | 50                 | 48                         | 63                           | 81                  |

### Qualitative

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

#### Agree

No comments

No comment

#### Disagree

- |   |   |
|---|---|
| a) Requiring objective evidence to consider a compliant may lead many complaints to be dismissed and important issue may not be investigated (7.13.1 b) | Objective evidence is an integral part of a complaint and not requiring it will lower the quality of the complaint system. Unsubstantiated complaints are considered as comments and reviewed in the next evaluation. |
| b) Template should be improved  | FSC will amend the form to make it more user friendly and share it with CBs.  |
| c) Anonymity of the complainant rule should not apply for persistent and vexatious complaints and CB shall inform CH about all complaints (7.13.5)      | Maintaining the anonymity is important and the requirement cannot be removed.   |

| Key Stakeholder Feedback  | FSC comment  |
|---|--|
| d) It is difficult to keep the complainant inform about the progress for countries where number complaints are usually higher.                              | General exception to a requirement cannot be applied to a certain country to ensure non-discriminatory requirements for all.   |
| e) Timeline for closing nonconformities and making certification decision will have huge implication for both certification bodies and certificate holders. | Requirements for closing all nonconformities before the certification decision was carefully introduced. Changes are made to ensure as little change as needed to the current system but at the same time to conform with ISO 17065 and to maintain FSCs' credibility. See annex 5 of FSC-STD-20-001 for overview of nonconformities requirements. |

## 8. Management System Requirements

This section includes the management system requirements for certification bodies which include the management system requirements for both with and without ISO 9001:2015 certification.

### Q45. Do you agree with the requirements included in section 8 management system requirements?

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q45       | 67                 | 72                 | 75                         | 69                           | 81                  |

### Qualitative

| Key Stakeholder Feedback  | FSC comment  |
|---|--|
| <b>Agree</b>  |  |
| a) Good to keep the requirements for auditor personal attributes.   | Requirements are already kept in Annex 2 table 3 of FSC-STD-20-001.  |
| b) A note is needed to clarify that the use of external personnel under contract is not outsourcing.  | Note is removed because it is duplicating requirement from ISO 17065 6.2.2.1 NOTE 2. As conformity to ISO 17065 is mandatory for all certification bodies therefore the note is also applicable. |
| c) If the work done by subsidiary of a CB (under same legal ownership) is not an outsourcing, then how CB preform the internal audit for those subsidiaries (clause 8.6.4). | Country office will be part of the annual review. Outsourcing companies will be subject to once in 3 years internal audit requirement.   |

## Annex 1 Avoidance of conflict of interest

This is a normative annex and includes the requirements and additional guidance to certification bodies around avoidance of conflict of interest.

#### Q46. Do you agree with the requirements included in Annex 1?

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q46       | 67                 | 68                 | 68                         | 75                           | 81                  |

#### Qualitative

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

#### Agree

- |   |  |
|---|--|
| a) Support the requirement that aims to reduce the conflict of interest.              | No comment   |
| b) Is Annex 1 being informative or mandatory, as Annex A in ISO 17065 is informative. | An Annex in a FSC normative document is always mandatory as stated in the Scope section, unless otherwise specified. Therefore, FSC only mentions when an Annex is informative otherwise it will be normative. |
| c) Templates cannot be made publicly available.                                       | The requirement adds an extra layer of control and helps to avoid conflict of interest.  |

### Annex 2 Qualification requirements for Forest Management and Chain of Custody auditor candidates and auditors

This is a normative annex and includes the requirements for auditor's initial and ongoing qualification requirements. The key changes in this annex include:

- Forest management auditor candidates and auditors (ref. Table 2):** Professional experience with secondary education is reduced from ten (10) years to six (6) years.
- Chain of custody auditor candidates and auditor (ref. Table 3):** Professional experience other than auditor with ISEAL membership is considered equivalent to experience in forest products sector.

#### Q47. Do you agree with the requirements included in Annex 2?

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q47       | 54                 | 55                 | 54                         | 75                           | 80                  |

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

#### Agree

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| a) Support the reduction on number of professional experiences required for FM auditor.                                    | No comment  |
| b) Opening working experience options for CoC auditor candidate is helpful.  | No comment  |
| <b>Disagree</b>  |   |
| a) Experience other than forest product sector should also be considered   | <p>FSC now accepts the following professional experience beyond the forest product sector:</p> <p>a) personnel of certification systems with ISEAL membership (e.g. internal or external auditor, reviewer or decision maker); and</p> <p>d) registered ISO management standard (ISO 9001, ISO 14001 and ISO 45001) with ISEAL system or experience as 9001 auditors.</p> |
| b) 10 years' experience for FM auditor should be maintained, reducing experience requirement may reduce the audit quality. | The competency requirements for each audit type are specified in Annex 3 to ensure that the audit team has the relevant competency to meet the audit objective. This is to ensure that if the auditor does not have all the competence, then it can be compensated by adding relevant experts to the audit team. Therefore, the audit quality will rather increase.       |
| c) Replace annual ongoing training with calibration meeting.   | Calibration meetings wherever conducted by FSC cannot replace the requirement for having annual ongoing training with special focus on changes in the FSC system. Ongoing training also depends on factors like results of the individual monitoring, the organization feedback and/or evaluation process.  |
| <b>Other</b>   |   |
| a) Clarity on the meaning of audit day is needed.  | <p>Definition of audit day is added in the document.</p> <p>Audit day: the day on which the auditor conducts the audit. The length of an audit day varies and depends on the audit plan.</p>  |
| b) Allow auditor candidates with education level lower than high school but with longer work experience for CoC.           | Lowering the education level may impact the quality of the audit and audit report.  |

## Annex 3 Audit Teams

This is a normative annex and includes the requirements for selecting an audit team in accordance with the type of audit. The key changes in this annex include:

1. For forest management audits: having expertise or expert to audit the relevant Principle and Criteria (P&C) and having social expertise or expert to audit P&C included in clause 1.5.2 of Annex 2.
2. For chain of custody audits: having team member with expertise in FSC core labour requirements.

### Q48. Do you agree with including social expertise/expert in the audit team where required as outlined in Annex 3?

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q48       | 39                 | 48                 | 50                         | 56                           | 65                  |

| Key Stakeholder Feedback  | FSC comment  |
|---|--|
| <b>Agree</b>  |  |
| a) Changes to introduce the relevant expert/competency in the audit team is important and it does not increase the audit cost where they are not needed.  | No comment   |
| b) Agree with the inclusion of social expert or expertise in evaluation of P&C 1, 4, & 9 (HCV 5 and 6).   | No comment   |
| c) Agree on the inclusion of expertise in FSC core labour requirements in CoC audit team as it is part of the auditor training.   | No comment   |
| <b>Disagree</b>   |  |
| a) Controlled wood audit at forest level should not require auditors to have FM auditor qualifications  | It is important for an auditor going to the forest level to have FM auditor qualification to conduct the evaluation in FSCs' context.  |
| b) Social expertise is almost needed in auditing all P&C: examples assessing community benefit (P5), Indigenous Cultural Landscapes, downstream water "for local Communities" (P9, HCV 4); in the management and monitoring of pesticides(P7,8), in disputes (P1 and others). | The requirement is amended to say: "The audit team shall have the relevant social competence to evaluate the organization for the applicable criteria <u>including but not limited to the...</u> " |

| Key Stakeholder Feedback  | FSC comment  |
|---|--|
| c) Use of translation tools/APPs etc. should be allowed to replace the requirement for having an interpreter. | Translation tools can be used as a supporting tool but cannot replace the requirements for having an interpreter.  |
| d) It is not viable to have many audit team members to meet clause 1.7.1 - 1.7.4.                             | FSC requires having relevant competencies rather than requiring a separate member to be part of the audit team. An auditor may have the required competency, but if not than a separate technical expert needs to be added. Second, the competency of the audit is linked with the audit objective and criteria. |

## Annex 4 Risk-based evaluation activities

This is a new normative annex and includes the requirements to be applied in case of high integrity risk. FSC introduces a risk-based approach at evaluation level for a supply chain or for certificate holders operating in an environment where existing conditions prevent a certification body from detecting nonconformities. The annex serves as a basis for the implementation of specified evaluation measures to mitigate the integrity risks as identified by FSC.

### Q49. Do you agree with the requirements included in Annex 4?

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q49       | 63                 | 52                 | 64                         | 56                           | 75                  |

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| <b>Agree</b>   |   |
| a) Supports the new approach and suggest that for lower risk the requirement should also be reduced. | The FM evaluation standard FSC-STD-20-007 specify the requirements for low risk and similarly the CoC evaluation standard FSC-STD-20-011 allows to waive an evaluation where there is no sale. This approach is only to target the area where there is threat to FSC integrity and credibility. The additional evaluation activities only apply to those area where the integrity risk is high. |
| b) This approach is very important to safeguard the credibility of FSC.                              |   |
| <b>Disagree</b>  |   |
| a) It is CH and CB that conclude the risk assessment.  | No, the integrity risk will be identified and assessed by FSC. Risk assessment is not based on CPI and the factors that contribute to the risk assessment are listed in Annex 4 of the FSC-STD-20-001.  |
| b) It would make difficult for companies to get certification in countries that are lower on CPI.    |   |



| Key Stakeholder Feedback  | FSC comment   |
|---|---|
| c) Notification time and date of communicating the high integrity risk should be fixed as once or twice per year so that CB can ensure to align it with the auditing program. | The notification period is fixed as either 1 January or 1 July.   |
| d) In case of full supply chain, it would be difficult to ensure unannounced audit.   | FSC will identify the scope of the supply chain. For example, plywood supply chains in China are identified as a high risk. So, FSC announces that the measures will apply to all clients that are in China, operate with W7 and W8.1, have birch for these products. |
| e) How many and which type of non-FSC invoices CB should check?   | Requirement for checking non-FSC invoices is related to the scope of identified risk during the evaluation. This is an additional requirement and only applies on case by case upon confirmation by FSC.  |

### Annex 5 Closure of nonconformities (informative)

This is an informative annex and added to Draft 2-0 to visually present the system for closure of nonconformities. Please note that the flow chart does not present the full functional approach as presented in ISO/IEC 17000:2020 Conformity assessment — Vocabulary and general principles. The purpose of this flow chart is to present the flow of closure of nonconformities and key timelines.

#### Q50. Do you have any feedback to the flow chart as presented in Annex 5?

| Key Stakeholder Feedback   | FSC comment   |
|--|---|
| <b>Agree</b>   |   |
| Flow chart is helpful to overview the full system for closure of nonconformities.    | No comment.   |
| <b>Disagree</b>  |   |
| Comments related to timeline for closing nonconformities and certification decision. | All relevant comments are addressed in section 'Evaluation' and 'Certification Decision'. |

### Annex 6 Procedure for transfer of FSC certification and license agreement for FSC certification scheme

This a new normative annex and replaces the <FSC-PRO-20-003 Transfer of FSC Certificates and License Agreements>. This reduces the number of normative documents and merges the relevant requirements. The key changes in this procedure include:

Terms for 'preceding' certification body and 'succeeding' certification body are changed to 'issuing' certification body and 'accepting' certification body.

#### Transfer process for voluntary transfer of certification

- a) Minimum thirty (30) days' notice to issuing certification body. No response for the issuing certification body to the transfer request will automatically lead to the transfer of certification (ref. clause 2.4 in Annex 6).
- b) Clarity provided around conducting a transfer audit within 3 months of the agreed transfer date (ref. clause 2.5 in Annex 6).

**Transfer process for non-voluntary transfer of certification**

- a) Clarified the process for non-voluntary transfer of certification and the requirements that do not apply in cases of non-voluntary transfer.

**Q51. Do you agree with the requirements included in section 1 of Annex 6 (fundamental principles for transfer)?**

**Q52. Do you agree with the requirements included in section 2 of Annex 6 (voluntary transfer)?**

**Q53. Do you agree with the requirements included in section 3 of Annex 6 (non-voluntary transfer)?**

**Q54. Do you agree with the requirements included in section 4 of Annex 6 (migration of records)?**

**Q56. Do you have any other feedback to Annex 6?**

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q51       | 71                 | 48                 | 70                         | 58                           | 63                  |
| Q52       | 71                 | 50                 | 75                         | 58                           | 75                  |
| Q53       | 71                 | 64                 | 80                         | 67                           | 71                  |
| Q54       | 71                 | 68                 | 80                         | 64                           | 50                  |

| Key Stakeholder Feedback   | FSC comment  |
|--|--|
| <b>Agree</b>   |  |
| a) Requirements are clear and reduce confusion. No comment   |  |
| b) Agree to keep the limit of transfer as it reduces the misuse of the system.   |  |
| <b>Disagree</b>  |  |
| a) Scenarios for transfer at recertification are clear in the text but not clear in the graphic.   | The graphic is now amended to reflect the concept and limit for transfer at recertification.   |
| b) As certificate holder can still transfer to a new CB by terminating its certification with the old CB, then there is no value for adding the limit to transfer. | By starting a new process, CH is required to have a main evaluation and a new license code. Whereas in the transfer process, CH keeps the old license code and is not required to have a full main evaluation. |
| c) Entry/record on database should be accepted as a record for agreement.  | This cannot be accepted as a record. as the accreditation body may not have access to the  |

## Key Stakeholder Feedback

## FSC comment

database. For transparency it is important to keep the records of the agreement.

- d) How can accepting CB request a transfer for non-voluntary transfer as the issuing CB does not valid anymore? The agreement on a transfer is not required for non-voluntary transfers.

## FSC-PRO-20-004 AUDITOR TRAINING PROGRAMME

### Part 1 Implementation Requirements for the Auditor Training Programme

Key changes introduced to the part 1:

- A) For CoC trainings, lectures may be presented online for both initial and ongoing trainings.  
B) For FM trainings, presenting lectures online shall be linked with in-person sessions for initial training. For ongoing trainings lectures may be presented fully online.

### Part 2: Content and Duration Requirements for the Auditor Training Programme

Key changes introduced to the part 2:

- A) Training provider to consider the additional material developed by FSC into the training content.  
B) FM training content to include database entry requirement, evaluation methods and audit scenarios  
C) CoC training content to include concepts of product groups, material sourcing, system for controlling the claim and FSC core labour requirements.

**Q56. Do you agree with the requirements included in Part 1 of FSC-PRO-20-004 Draft 1-0?**

**Q57. Do you agree with the requirements included in Part 2 of FSC-PRO-20-004 Draft 1-0?**

**Q58. Do you have any other feedback to the FSC-PRO-20-004 Draft 1-0?**

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

| Questions | Certificate Holder | Certification body | FSC member (not elsewhere) | Other (FSC, ASI, Consultant) | FSC Network Partner |
|-----------|--------------------|--------------------|----------------------------|------------------------------|---------------------|
| Q56       | 67                 | 59                 | 58                         | 58                           | 88                  |
| Q57       | 71                 | 66                 | 70                         | 66                           | 70                  |

## Key Stakeholder Feedback

## FSC comment

### Agree

- a) Good to keep the online trainings for CoC, as it provides flexibility for training providers and ensure more participation. Based on the feedback and on the discussion with working group, FSC is only now keeping the provision of online trainings in exceptional cases e.g. travel restriction, pandemic etc.

### Disagree

- a) In-person component in the initial CoC auditor training should be kept as it ensure a better quality of a training than an online training. The in-person training component is kept for both FM and CoC initial training. Only in exceptional

| Key Stakeholder Feedback   | FSC comment  |
|--|--|
|  | cases e.g. travel restriction, pandemic etc. the online trainings are permitted.   |
| b) Rather than requiring a new change to implement within 3 months, it should be required to implement together with the effective date of the change.           | The requirement has been amended to replace the 3 months with effective date of the changes to the FSC normative framework.  |
| <b>Other</b>   |  |
| a) Instructor shall have the academic training and experience to teach the relevant social aspects of FSC P&C.   | The procedure provides a provision to include a resource person to the training team where needed. Therefore, the trainer is not required to have all the competencies to deliver a training.  |
| b) Training shall include a component of real audit in the certified organization to train the participants with the skills to audit to achieve audit objective. | The procedure includes a requirement to ensure that the training courses shall have a practical orientation by providing trainees with realistic examples, case studies, simulations, or field visits. Regarding the mandatory visit or audit of a certified organization, FSC requires that the auditor candidates shall participate in 4 audits where at least 2 as an active member of the audit team with one of these two as audit team leader. |



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