

FOCUSED CONSULTATION REPORT ON ADV-PRO-60- 006b_01

Assessment of conversion of natural forest and transformation of
plantations to agricultural use



FSC

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Title:	Focused Consultation Report on ADV-PRO-60-006b_01	
Date:	31 October 2025	
Responsible program:	Country Requirements – General Functions	
Contact for comments:	Email: countryrequirements@fsc.org	
Author:	Greta Walters; Nicolás Mesía Rojas	
Objective of document:	To summarize the responses to the recent consultation on draft ADV-PRO-60-006b_01	
Confidential?	☐ Yes	☒ No
Intended audience	☐ Internal (FSC)	☒ External
Personal data included?	☐ Yes	☒ No

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A. INTRODUCTION

Advice Note: Assessment of conversion of natural forest and transformation of plantations to agricultural use

(ADV-PRO-60-006b_01 D1-0)

As we draw closer to 30 December 2025, when the European Union Regulation on Deforestation-free Products 2023/1115 (EUDR) is set to become applicable to large and medium companies, FSC has been considering how its certification system can remain responsive to the needs of the market and support certificate holders in complying with their obligations under the EUDR.

Purpose and Scope

This Advice Note is relevant for:

- organizations sourcing controlled material using <FSC-STD-40-005 V3-1 Requirements for Sourcing FSC Controlled Wood>;
- parties involved in the development or revision of FSC Risk Assessments per <FSC-PRO-60-006b V2-0>; and
- organizations implementing the FSC Regulatory Modules as a tool to demonstrate compliance with the EUDR.

This Advice Note intends to align FSC's methodology for the assessment of Indicator 55 (which relates to the conversion of natural forests and transformation of plantations to agricultural use) with the EU benchmarking results released in May 2025, which designated countries as 'high' or 'low' risk.

Process and Timeline

This Advice Note follows the accelerated process outlined in <FSC-PRO-01-001 Development and Revision of FSC Requirements>.

The focused consultation targeted certification bodies (CBs), FSC Network Partners, those involved with developing FSC risk assessments, and other experts. Communication materials were distributed via OneFSC, the Intranet, and the CB Forum email.

Consultation period: 18 August – 1 September 2025

Expected publication date: 31 October 2025

Effective date of the Advice Note:

- a) 1 November 2025: For all the parties involved in the development or revision of FSC Risk Assessments in accordance with <FSC-PRO-60-006b V2-0 Risk Assessment Framework>.
- b) 1 January 2026: For organizations developing Extended Company Risk Assessments (ECRA) in accordance with <FSC-STD-40-005 V3-1 Requirements for Sourcing FSC Controlled Wood> or in accordance with the FSC Regulatory Modules

Thank you to participants!

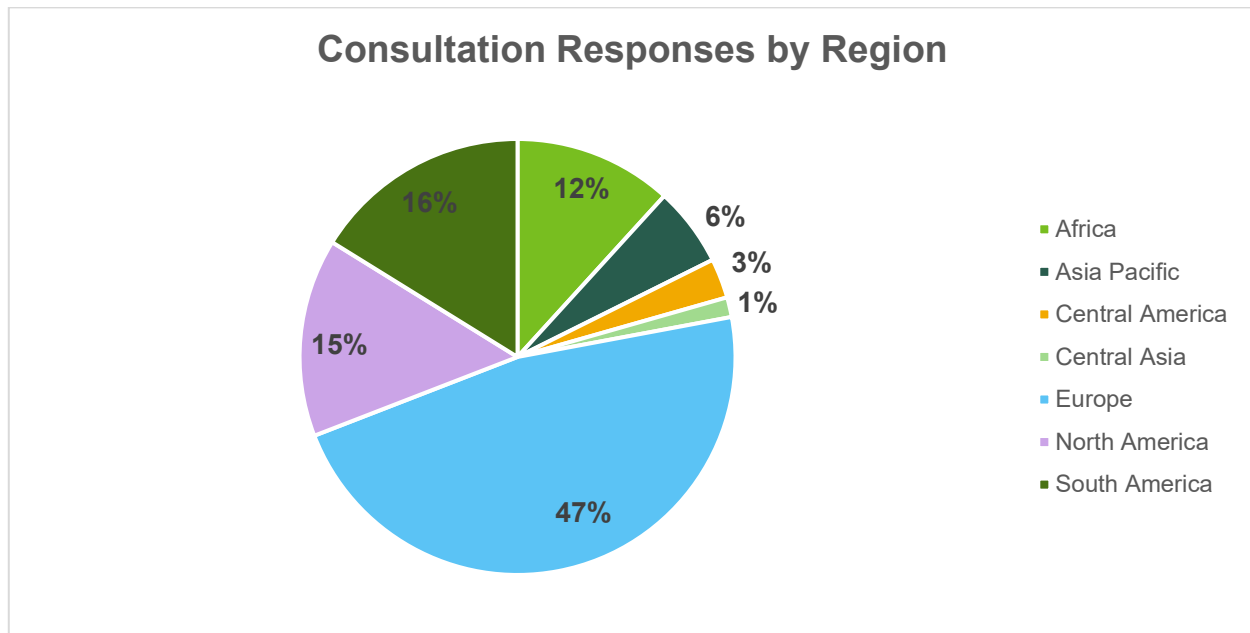
On behalf of the Country Requirements team, thank you very much for providing your feedback in this consultation!

For comments or questions, please contact country_requirements@fsc.org.

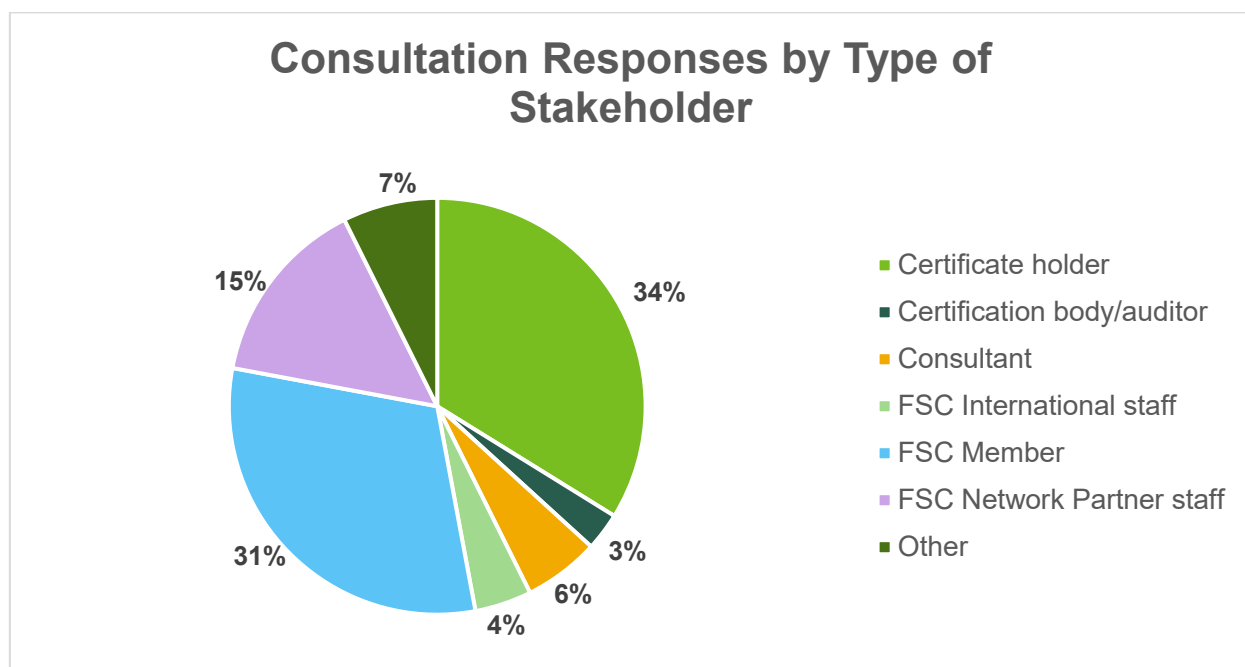
B. ANALYSIS OF RESPONDENTS

A total of **68 stakeholders** responded to the consultation.

Breakdown by Region: The majority of responses were received by stakeholders in Europe.



Breakdown by stakeholder type: Notably, approximately 34% of the respondents were certificate holders, 31% were FSC members, and 15% were FSC Network Partner staff.



C. KEY INSIGHTS OBTAINED FROM THE CONSULTATION RESPONSES

Analysis of Consultation Responses

The Consultation asked one open question, being “Do you have any feedback on whether additional changes should be made to the FSC Advice Note, with respect to the assessment of Indicator 55, in light of the EU benchmarking results?”

Of the 68 responses received, there was approximately 31 responses of support; 21 responses of disagreement; 13 responses with mixed views; and 3 responses which were not relevant.

FSC has carefully reviewed the responses, and we summarise the main feedback and suggestions as follows:

Main Topic	Consolidated key feedback	Suggestions for FSC	FSC Responses
Unreliability of EU benchmarking methodology / results	Many stakeholders raised concerns about the unreliability of the benchmarking methodology. Key questions were: • What if the results of a FSC Centralized National Risk Assessment (CRNA) are inconsistent with the EU benchmarking? • What if there is information to suggest the EU classification is inaccurate? • What if the methodology changes in the future? Respondents cited the following concerns: • The deforestation statistics used in EU benchmarking were consolidated at the national scale (combining the impact of multiple land uses, not just forestry) and only from 2015-2020. • The EU benchmarking classifies each country with a single risk rating, despite many countries having different risks in different parts of the country or between source types (e.g. natural forests vs plantations). • Under the EU benchmarking, ‘no net forest loss’ is a reason for classification as “low risk”, so conversion to agriculture might not be taken into account as long as it is “compensated” by natural regeneration and expansion of plantations. • It is inherently political and subject to shifts in policy, trade dynamics, and geopolitical influence. • It is likely to change. Forest degradation is meant to be included in future benchmarking, so it will no longer solely address ‘conversion to agriculture’.	FSC should have a robust multi-source approach that ensures risk designations remain fair, context-sensitive, and resilient to external shifts. FSC should amend the Advice Note so the EU benchmarking results are an optional (not mandatory) non-negligible risk threshold for Indicator 55. FSC should amend the Advice Note to allow a chamber-balanced Working Group to designate an area as ‘non-negligible risk’, even if the country is ‘low’ risk under the EU Benchmarking, if there is credible data that applicable conversion has taken place in the area under assessment since 31 December 2020.	Based on this feedback, FSC has made the following changes to the Advice Note. <u>Change 1:</u> To address the possibility of EC modifying the benchmarking methodology in the future to allow for sub-national classification, FSC will modify threshold 1 as follows: “1. <i>The European Commission’s official assessment based on Article 29 of EU Regulation 2023/1115 does not classify the country under assessment, or parts thereof, as low risk.</i>” <u>Change 2:</u> To address the possibility of a country being classified as ‘low risk’ by the EU benchmarking, and FSC subsequently becoming aware of evidence of conversion of natural forest and/or transformation of plantations to agricultural use occurring after 31 December 2020, FSC will include a second threshold that states: “2. <i>More recent/additional data available indicates that the low risk classification for the country under assessment, or parts thereof, by the European Commission’s official assessment based on Article 29 of EU Regulation 2023/1115 should be revised.</i>”

Main Topic	Consolidated key feedback	Suggestions for FSC	FSC Responses
Inclusion of 31 December 2020 cut-off date	The cut-off date of 31 December 2020 will have significant impacts that have not been debated with FSC members or reviewed in terms of impacted countries where land use changes occur to farmed plantations.	No suggestion explicitly proposed. A suggestion to remove the cut-off date can be implied.	The cut-off date is already part of the current assessment of Indicator 55. It is aligned with the FSC Policy to Address Conversion and the EUDR, and an essential part of the assessment of conversion and degradation.
The Advice Note could be more consistent with EUDR's broader approach to 'conversion of land'	Some stakeholders argued the assessment of Indicator 55 should be fully consistent with the EUDR, including its approach to the conversion of land, not just the benchmarking results. They noted: - Art 2(3) defines 'deforestation' as <i>"the conversion of forest to agricultural use, whether human-induced or not"</i>. - EUDR Guidance provides an <u>exception</u> on page 29-30: <i>"Where it can be demonstrated by adequately conclusive evidence that both (i) a plot of land was under 'agricultural use' as described above before 31 December 2020, and (ii) where a producer decided to plant short rotation coppice or commit the land to temporary afforestation before that date or after that date and that land does not fall under the scope of a forest management plan or legislation requiring forest management or protection of forest on that plot of land, such plot of land is deemed to remain in agricultural use for the purposes of the EUDR and the producer may continue agricultural activity on that plot of land."</i> - EUDR Guidance provides that 'agricultural plantations' do not fall under the definition of "forest".	Insert clarifications in the Advice Note – e.g.: If a plantation was established on land previously used for agriculture pre-2020, and there is no legal obligation to keep it as a plantation, this change does not constitute 'conversion of natural forest and/or transformation of plantations to agricultural use'.	The intention of this Advice Note is to align FSC's methodology for the assessment of Indicator 55 (which relates to the conversion of natural forests and transformation of plantations to agricultural use) with the EU benchmarking results released in May 2025. The suggestions made by stakeholders go beyond the remit of the purpose of this Advice Note.
Criticising the 'transformation of plantations to agricultural use' being a 'non-negligible risk threshold' for Indicator 55	Some stakeholders argued: - The intent of FSC has always been to prevent <u>natural</u> forest conversion. - The Advice Note doesn't recognise that plantation forestry may involve changing to other crops to conserve water or biodiversity (i.e. positive environmental impacts). - The Economic chamber has lobbied for years to make it understood that the conversion of plantations (which is a grown monocrop on agricultural land) is not the same as indigenous/natural forests. The way and process in which significant risk assessment changes are now being made are a significant concern to FSC members in the Economic chamber.	No suggestions proposed.	Indicator 55 currently provides that <i>"1. Evidence ... that ... transformation of plantations to agricultural use is occurring"</i> is a non-negligible risk threshold. This is not a new concept introduced by the Advice Note. Rather, the intention of this Advice Note is to align FSC's methodology for the assessment of Indicator 55 (which relates to the conversion of natural forests and transformation of plantations to agricultural use) with the EU benchmarking results released in May 2025. The suggestions made by stakeholders go beyond the remit of the purpose of this Advice Note.

Questions raised in Consultation Responses

In addition to the above key feedback, respondents also raised the following questions:

Question	FSC Response
Will FSC analyse the need for potential changes to FSC Risk Assessment Framework Indicator 57 on forest degradation, including its potential alignment with the EU approach after EU's degradation report/benchmarking is published?	For the moment, we are only focusing on Indicator 55. If the EU benchmarking is modified in the future to include the assessment of degradation, then FSC will consider what (if any) implications there are for the FSC Risk Assessment Framework. It is worth highlighting that the assessment of Indicator 57 is not only focused on EUDR but also aligned with FSC's Policy to Address Conversion.
Can FSC confirm that the effect of the advice note is retroactive, that is, for risk assessments that have been currently developed according to the new procedure and are currently in the review and approval phase?	Yes. The elements of the Advice Note are already being incorporated in the FSC Risk Assessments under development and those that have recently been published.
What if the European Commission changes the classification of a country while a product has left the country of origin and is in transit to the EU?	In the context of EUDR implementation, it is FSC's understanding that the risk classification to be applied by the operators corresponds to the one defined at the time of harvest. Relevantly, in response to consultation feedback, we have introduced a second threshold in the Advice Note to provide that a non-negligible risk threshold will apply if more recent/additional data available indicates that the 'low risk' classification by the European Commission should be revised.



FSC International – Policy & Performance Unit

Adenauerallee 134

53113 Bonn

Germany

Phone: +49 -(0)228 -36766 -0

Fax: +49 -(0)228 -36766 -65

Email: countryrequirements@fsc.org