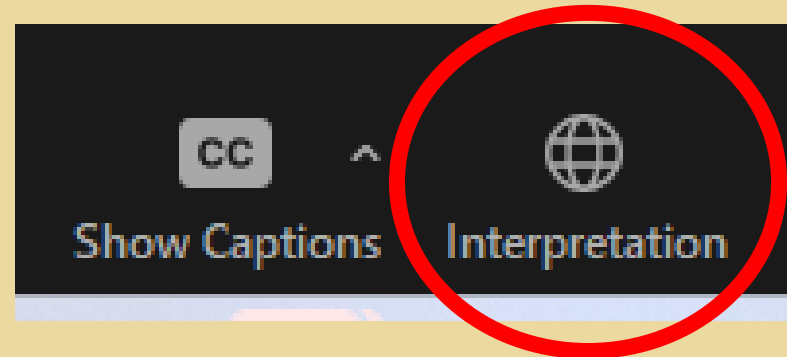


Webinar: Consultation on Revision of FSC Chain of Custody Standards

Tuesday 18 November 2025

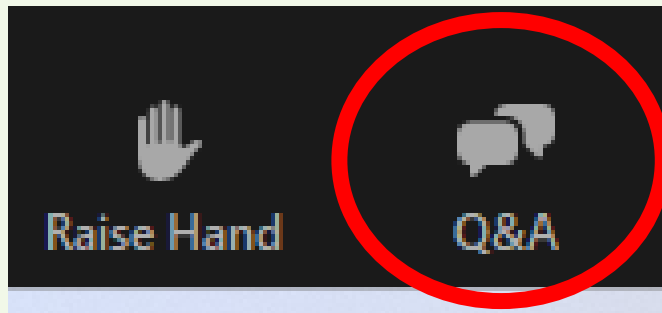
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submitted by another person



Please ask your
questions
anonymously.
Chat function is
disabled



The PowerPoint
slides and the
recording of this
webinar will be
published on the
CoC revision
page.



Presentation
will be
approximately
60 minutes
followed by 30
min Q&A

AGENDA



Topic

- 1 Process updates and timeline
- 2 Main chain of custody requirements
- 3 Group & multisite requirements
- 4 Circularity & sourcing reclaimed material
- 5 Workers' rights
- 6 Other changes to FSC-STD-20-011
- 7 Q&A

Process updates and timeline



Timeline for the CoC revision



Important dates



CONSULTATION ON 1ST DRAFT

Open from 15
November 2025 to 25
January 2026

2 PUBLIC WEBINARS

Morning session:

18 November
(9:00 – 10:30 CET)

Afternoon session:

03 December
(16:00 – 17:30 CET)

CONSULTATION ON 2ND DRAFT

Will be open 01 May
to 31 May 2026

Main chain of custody standard



FSC CLAIMS

FSC CFM

1. 70% claim contribution
2. Sold only as raw or semi-finished (B2B)



© FSC / Sweden K Örjavik

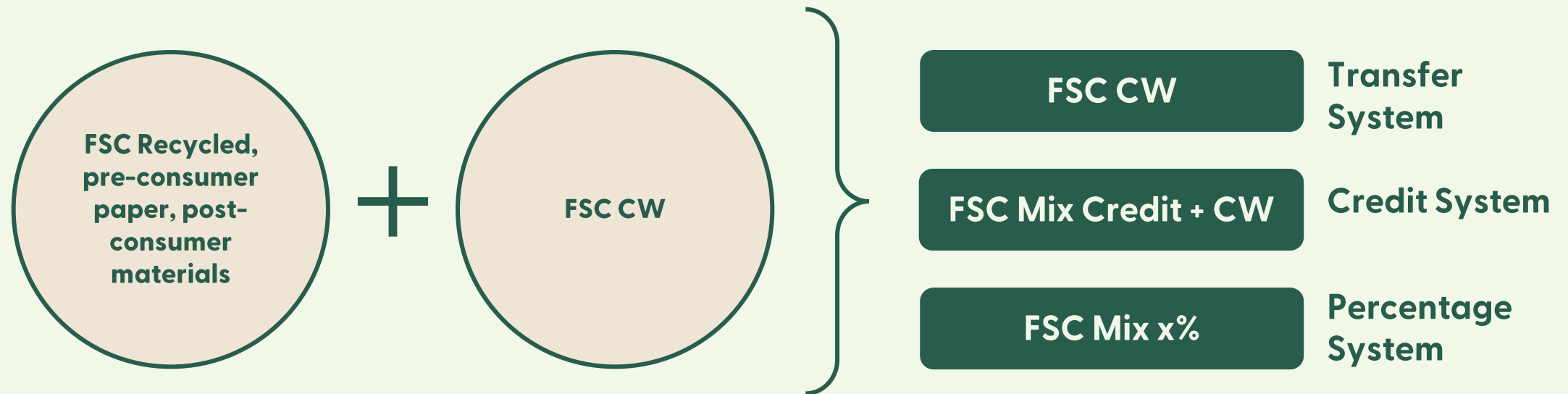
ADVICE-40-004-17

Products 100% made of reclaimed materials can be claimed as FSC Mix.

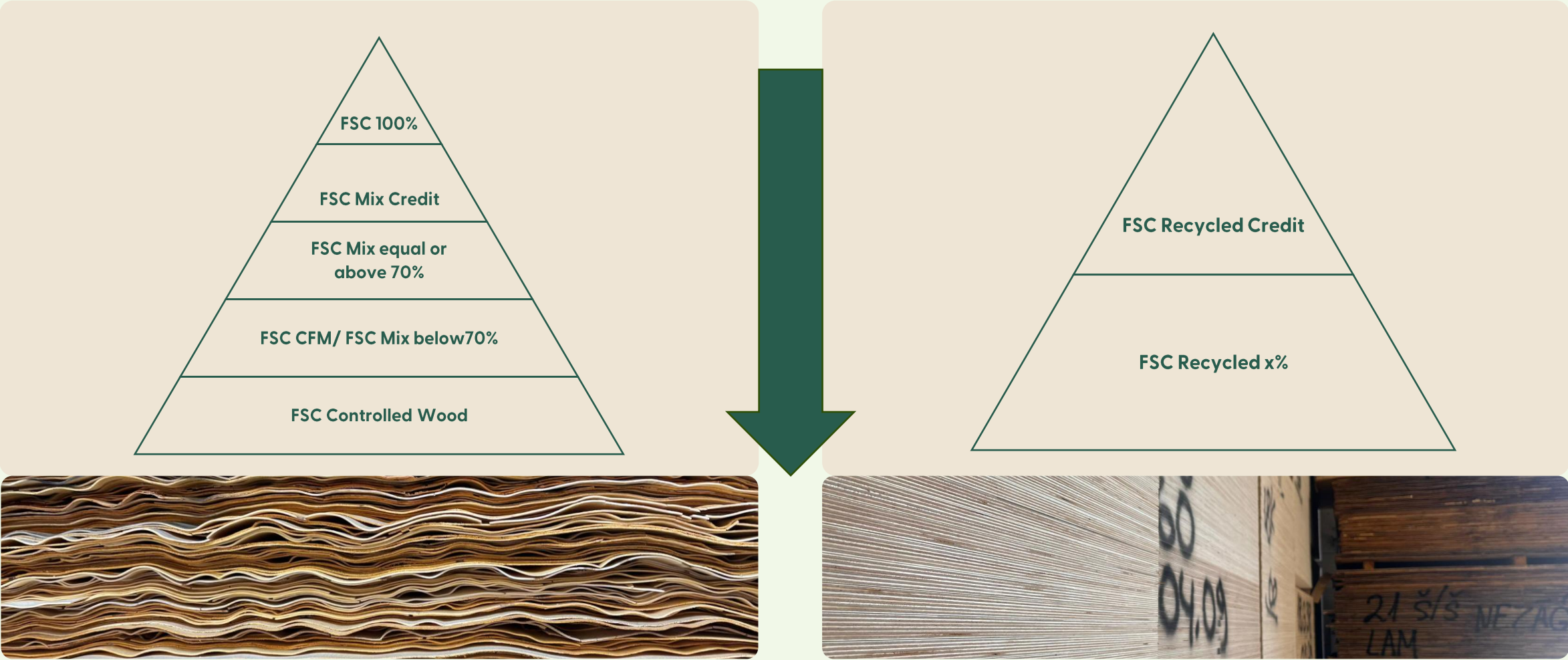


‘Output claim for FSC CW + FSC Recycled/Reclaimed Inputs’: Proposed changes

To include possibility for an output claim, where input materials are combination of:
FSC CW and FSC Recycled/claim-contributing reclaimed materials



Downgrading options



OUTSOURCING

Outsourcing

Proposed changes to FSC-STD-40-004

CLEARER REQUIREMENTS FOR:



**Certified vs. Non-
certified contractors**



CH Service Providers



**Scope of Activities
that can be
outsourced**

(e.g., logging, harvesting)

NEW RULES FOR:



**Regulation of further
outsourcing**

Only to be permitted:

- to certified contractors; or
- with tri-party agreement between CH, contractor + subcontractor

NEW EXEMPTION FOR:



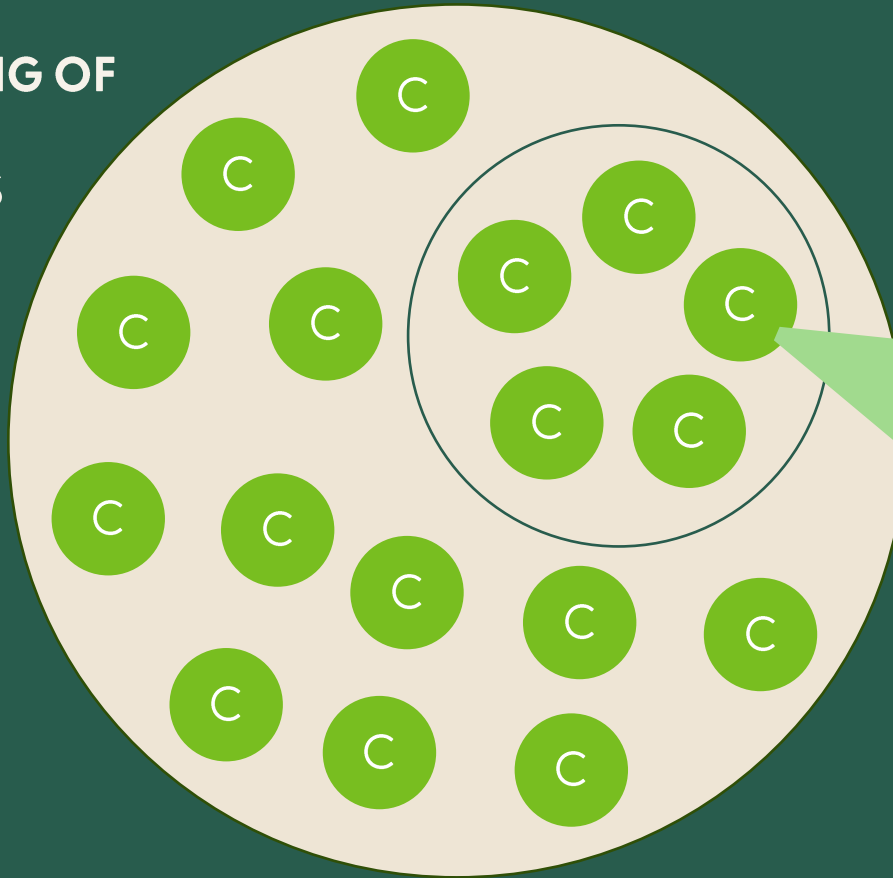
**Storage sites &
logistic activities**

if no risk of mixing

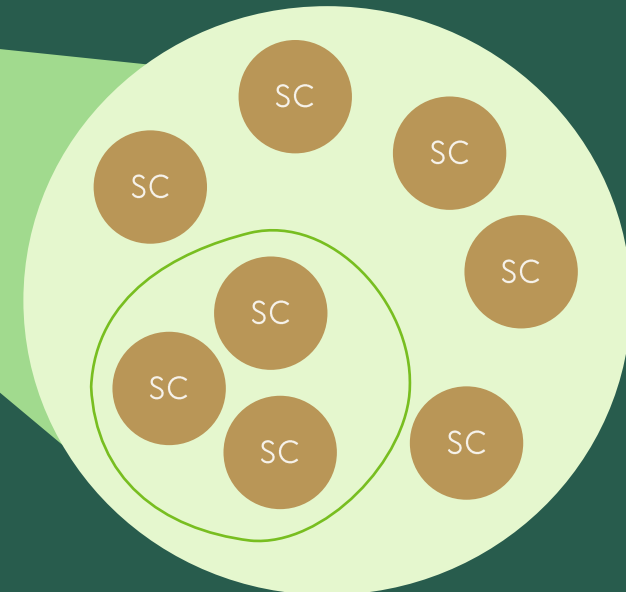
Proposed method for evaluation subcontractors

Proposed changes to FSC-STD-20-011

**STEP 1: SAMPLING OF
HIGH-RISK
CONTRACTORS**



**STEP 2: IF SELECTED
CONTRACTOR HAS
SUBCONTRACTORS, TAKE
A SAMPLE OF
SUBCONTRACTORS**



Outsourcing

Proposed changes to FSC-STD-20-011

High Risk Contractors (risk of mixing)



Entire manufacturing process of a product



Mixes input materials

e.g., FSC 100% mixed with FSC Controlled Wood



Applies the FSC label



Activities critical for the development and maintenance of management system

High Risk Contractors (CLR)



Substantiated concerns regarding conformity with CLR

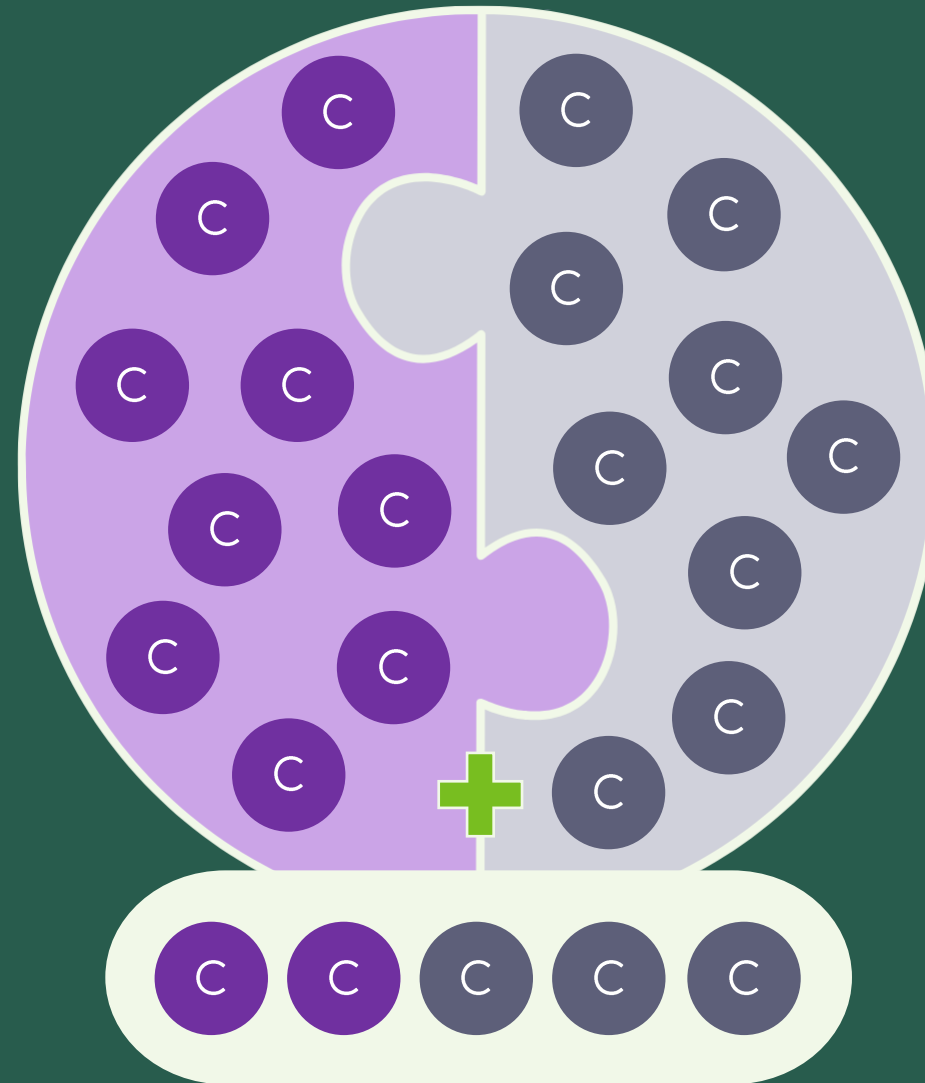


High risk classification for CLR for country/region (FSC CLR Risk Matrix) and neither apply:

- 1) No CLR NCs in last 5 years;
OR
- 2) 1st-/2nd-/3rd party audit covering FSC CLR.

Evaluation of high-risk contractors

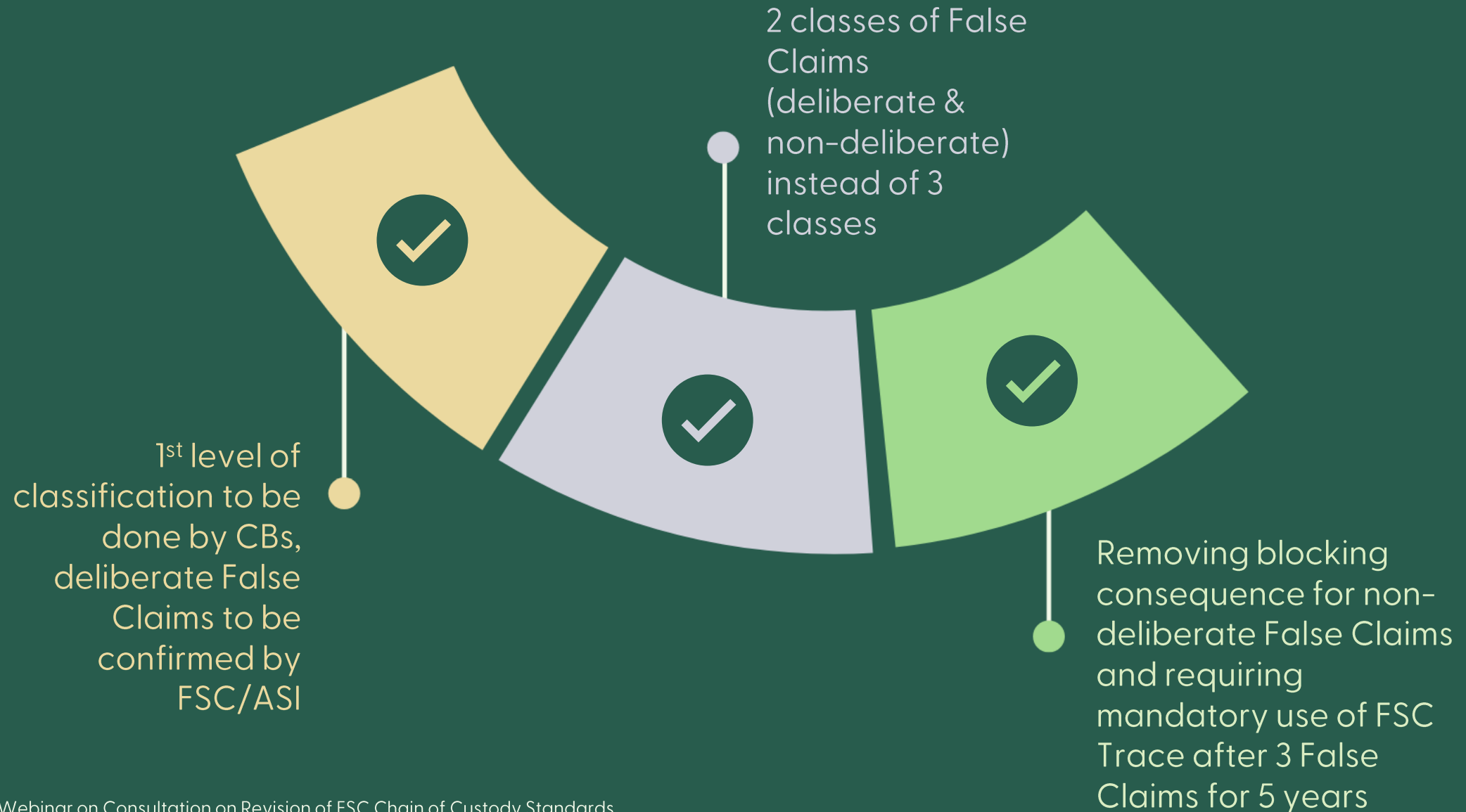
**HIGH-RISK BASED
ON RISK OF MIXING**



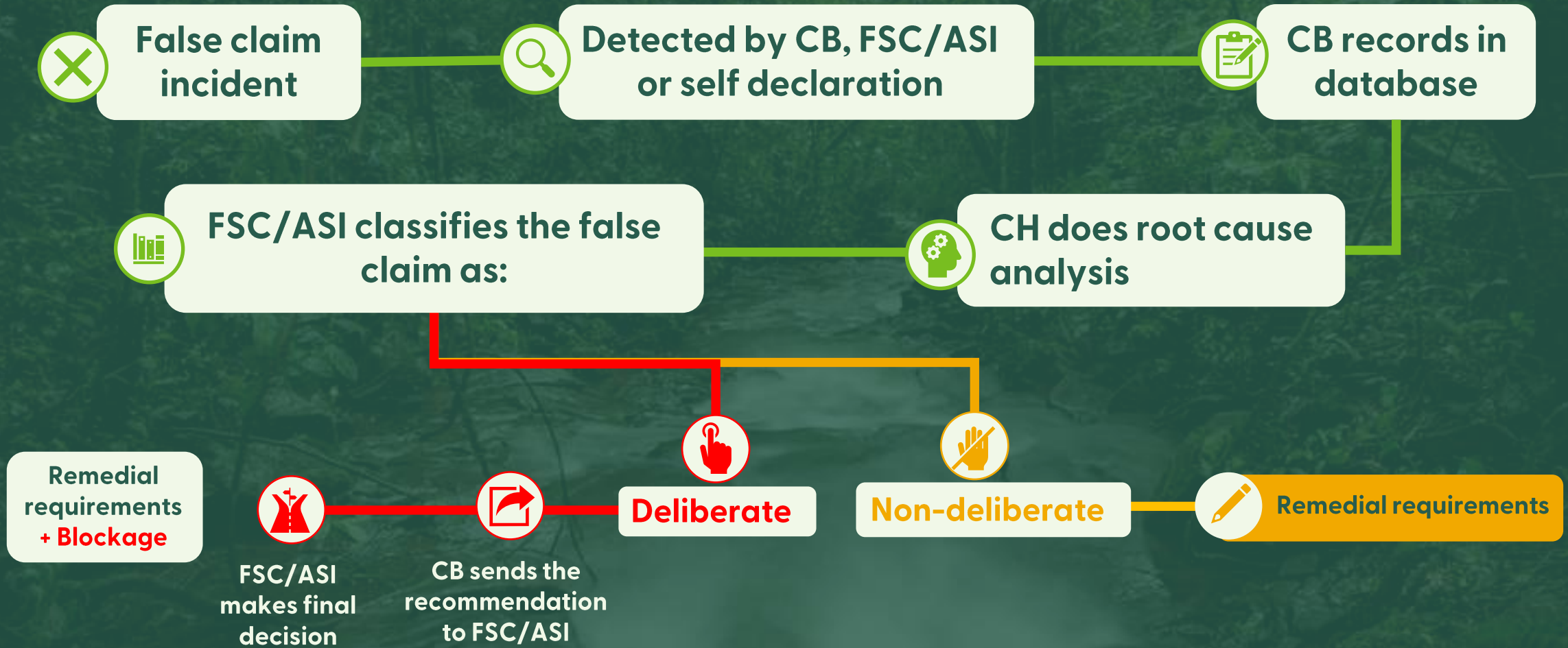
**HIGH-RISK
BASED ON CLR**

FALSE CLAIM

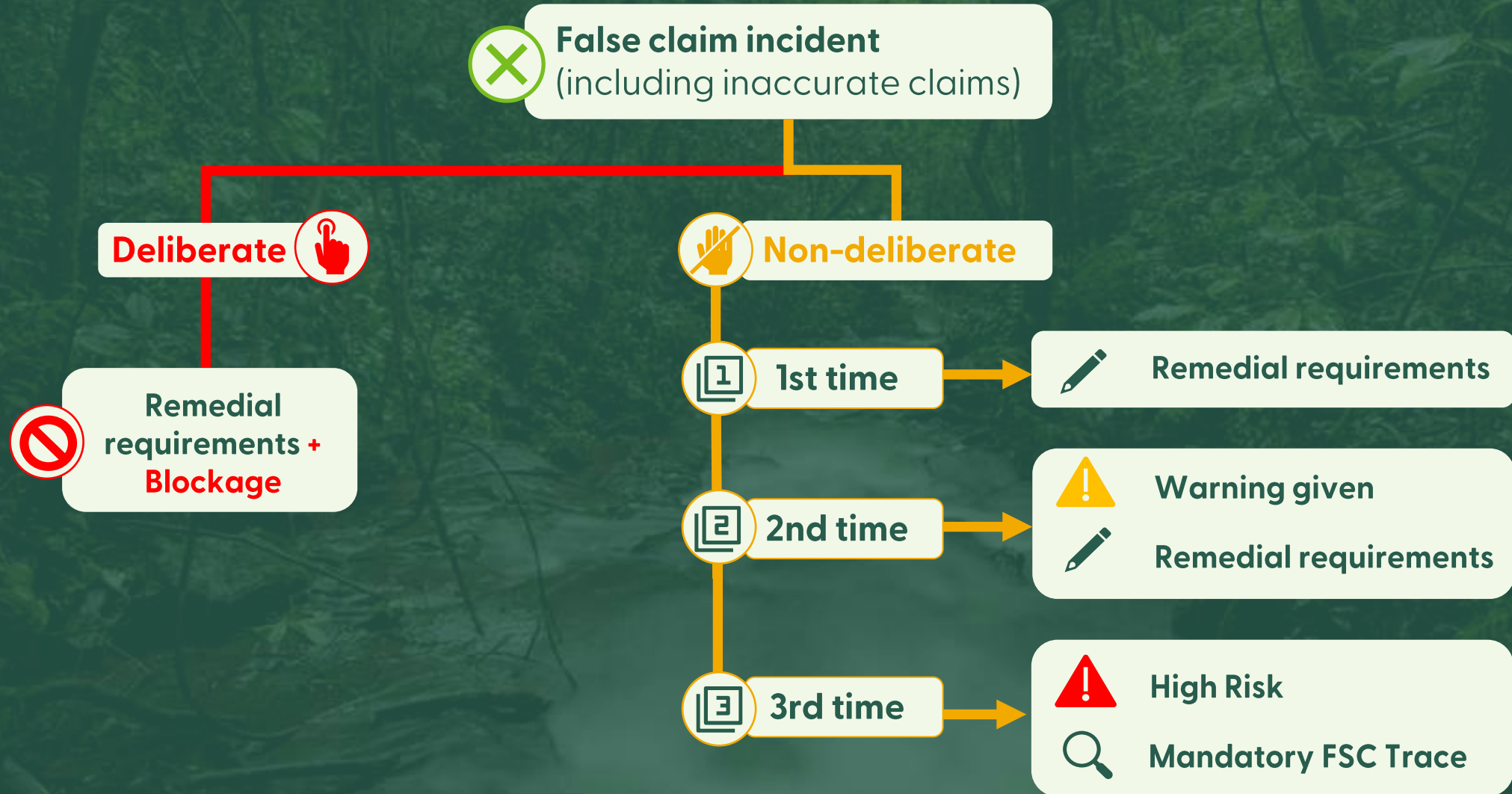
Summary of proposed changes to False Claims



Proposed changes to False Claims Process



False Claims Process



Group certification requirements



Current normative requirement

TO BE ELIGIBLE TO PARTICIPATE IN GROUP COC CERTIFICATION, THE PARTICIPATING SITES SHALL COMPLY WITH THE FOLLOWING ELIGIBILITY CRITERIA:

- a) Each Participating Site shall qualify as “small” as defined by:
 - I. No more than 15 employees (full time equivalent); or
 - II. No more than 25 employees (full time equivalent) and a maximum total annual turnover of US\$ 1,000,000
- b) All Participating Sites shall be located in the same country as the Organization that holds the certificate.



FSC-PRO-40-003 / FSC-PRO-40-003a

© FSC / Sweden K Örjåvik

Proposed changes

CHANGING ELIGIBILITY CRITERIA TO:



Staff headcount of **≤49 FTEs**; **OR max.** annual forest product turnover of **US\$10,000,000**.



Adjust turnover in line with the AAF change (the procedures will be withdrawn)



Sites **do not need** to be within the same country



REMOVED

the limited number of participating sites for group certifications



NEW DEFINITIONS

for CHs: sub-sites, staff headcount, group certification, multi-site certification



REVISED

requirement for Central Office auditors, for certifications with 20+ participating sites not linked through common ownership

RATIONALE:



Aligns with global development



Does not require support from the procedure and aligns with FSC inflation adjustment

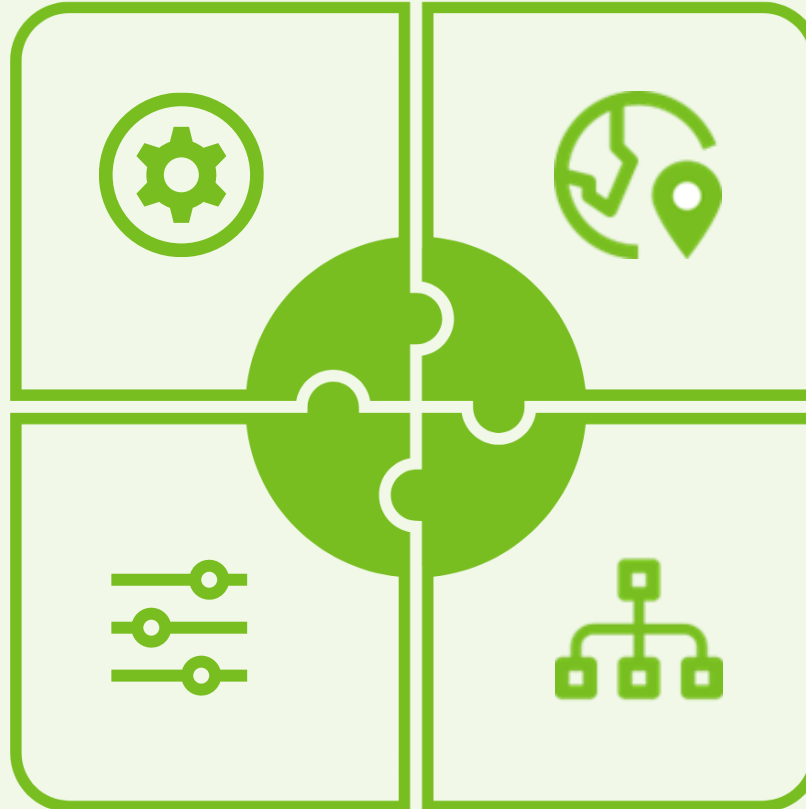
What is being changed in FSC-STD-20-011?

INCORPORATING A RISK-BASED APPROACH, BY:

Amended definition of ‘high-risk participating sites’

Setting requirements for sampling participating sites based on the risk level

High-risk participating sites will have a sampling rate of 1.5 times higher than the rate for low-risk participating sites.



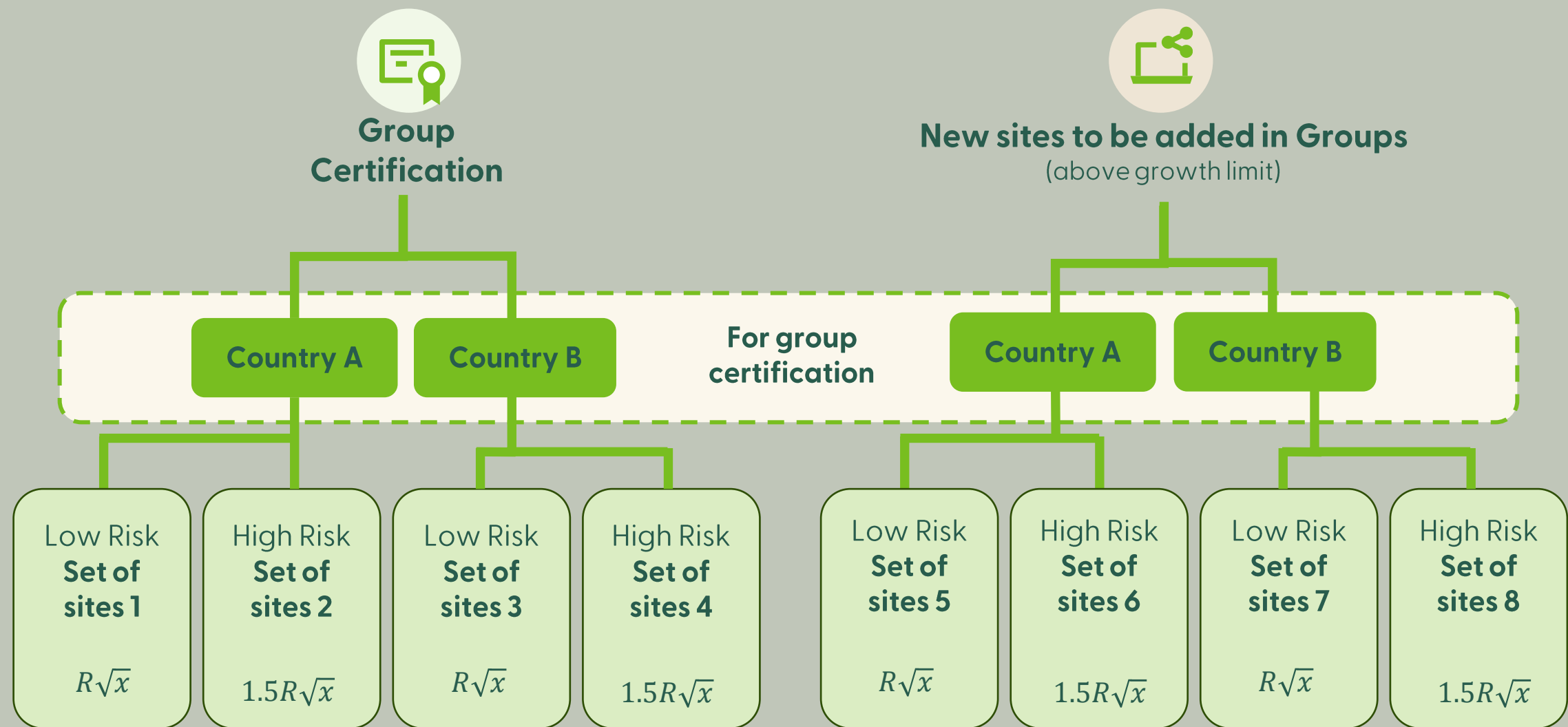
New requirement for auditing of group certification where participating sites are in multiple countries

New requirement for sampling participating sites and sub-sites

Proposed change – Risk index matrix

Risk factor		Score	Score Given
Ownership	All participating sites have common ownership	0.1	
	Participating sites do not have common ownership	0.2	
Certification size	0–20 participating sites	0.2	
	21–100 participating sites	0.3	
	101–250 participating sites	0.4	
	251–400 500 participating sites	0.5	
	> 400 500 1 participating sites	0.6	
Central office's performance	No CAR issued to the central office in the previous evaluation	0.1	
	Not applicable (there was no previous evaluation)	0.1	
	Only minor CARs in the previous evaluation	0.2	
	1–2 major CARs in the previous evaluation	0.3	
	3 or more major CARs in the previous evaluation	0.4	
Audit type	Annual surveillance evaluation	0.1	
	Re-evaluation	0.2 0.1	
	Main evaluation	0.3	
	Audit for inclusion of new participating sites in the certificate	0.3	
TOTAL (R = sum of the scores given)			Σ

Method for sampling group certification in multiple countries



CROSS BORDER PERCENTAGE/ CREDIT SHARING

Current restriction on using percentage/credit system

PERCENTAGE SYSTEM

10.4 When the percentage system is applied at the level of multiple physical sites, the percentage shall be calculated based on an average FSC% of the inputs received by all sites. The conditions for the application of the percentage system at the level of multiple physical sites are the following:

- a) the percentage calculation shall only be applied to products within the same product group;
- b) all sites shall be within the scope of a single or multi-site certificate with a common ownership structure;
- c) all sites shall be located within the same country or the Eurozone;
- d) all sites shall use the same integrated management software;
- e) each site participating in a cross-site percentage calculation shall have an FSC percentage (FSC%) of at least 50%.



CREDIT SYSTEM

11.3 The credit system may be applied at the level of a single or multiple physical sites. The conditions for the establishment of a centralized credit account covering multiple sites are the following:

- a) credits shall be shared within the same product group;
- b) all sites shall be within the scope of a single or multi-site certificate with a common ownership structure;
- c) all sites shall be located within the same country or the Eurozone;
- d) all sites shall use the same integrated management software;
- e) each site participating in a cross-site credit account shall contribute at least 10% of the input credits used by its own site in a 12-month period.



Proposed changes

ENABLING CROSS-BORDER CREDIT/PERCENTAGE SHARING



Low integrity risk identified during the pilot test



Strong support in enabling cross-border credit/ percentage sharing



Aligns with purpose of simplification



Minimal risk identification



No additional implementation framework

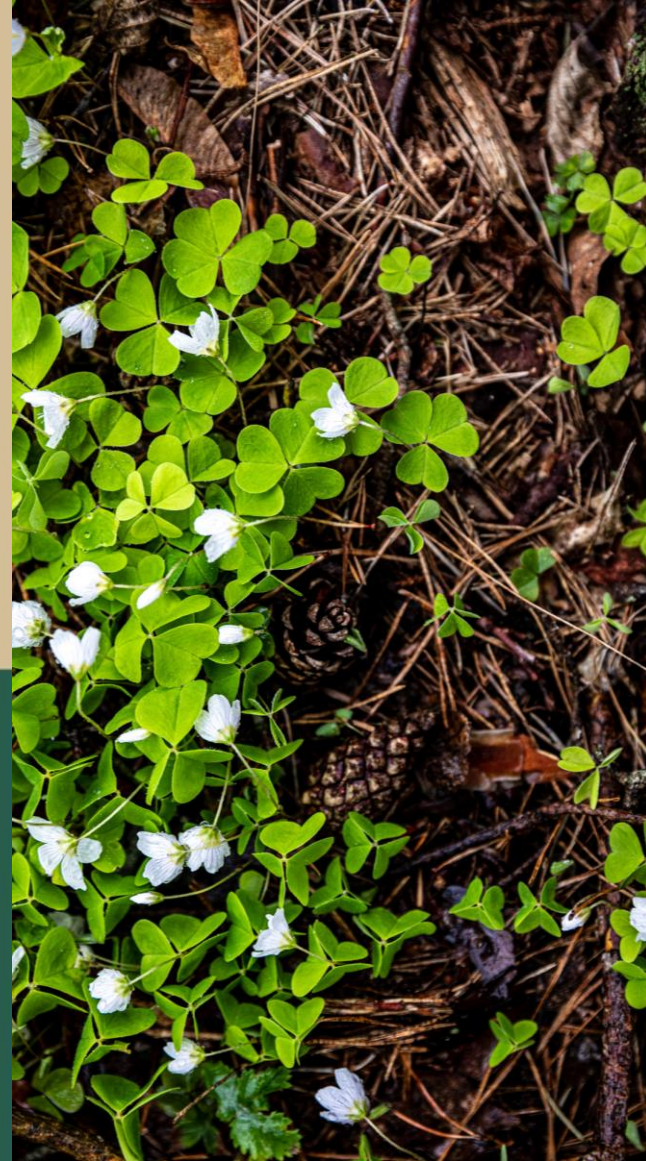
PROPOSED DRAFTING:

~~c) all sites shall be located within the same country or the Eurozone;~~

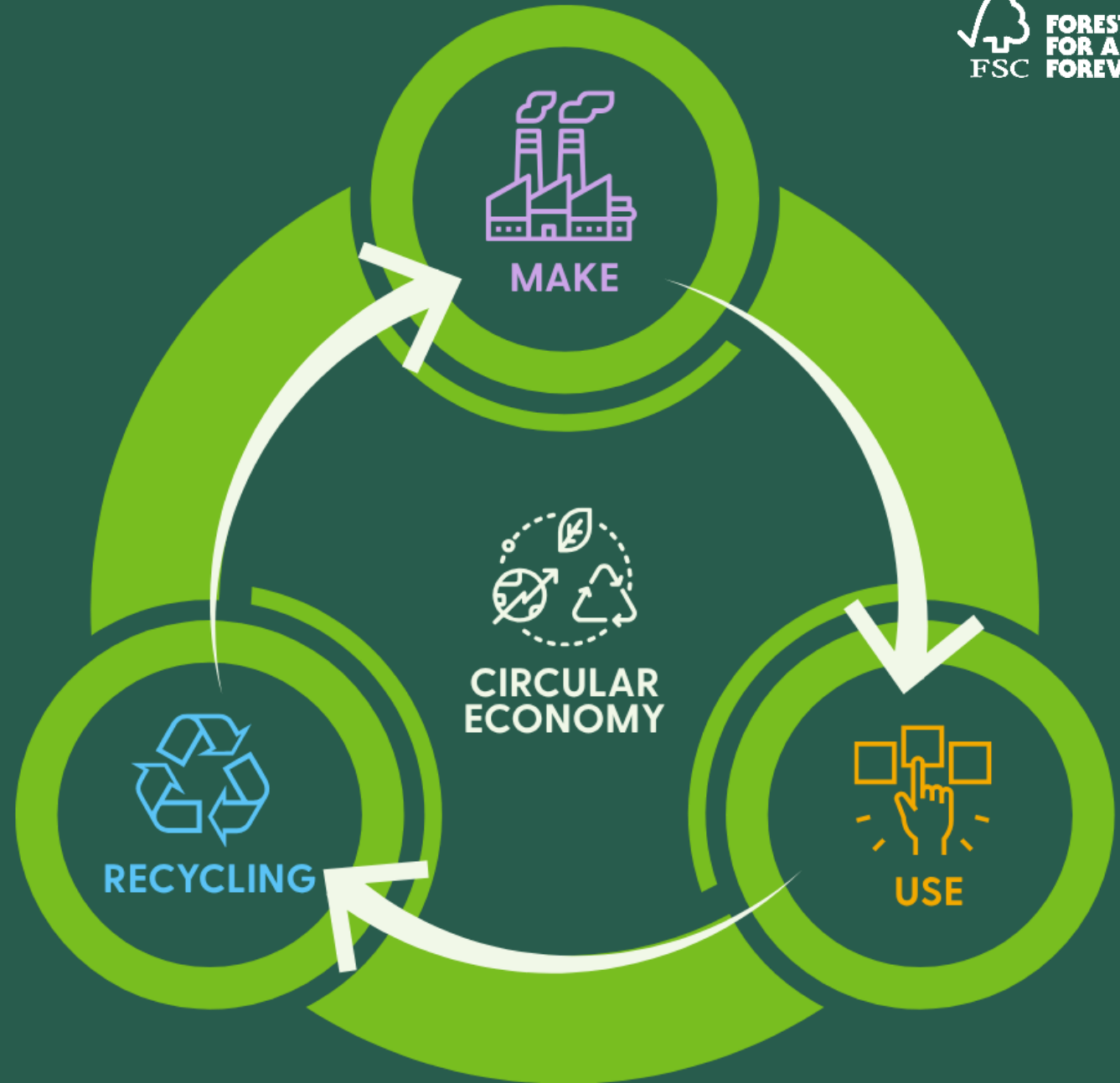
c) each site shall be located in a geographic area or have a certification scope that is not specified as “high integrity risk”



Circularity and sourcing reclaimed material



ENHANCING CIRCULARITY and EMBRACING PRODUCT as a SERVICE (PaaS)



Product sale vs PaaS: Direction of Product Flow

PRODUCT SALE = LINEAR FLOW



PaaS = CIRCULAR FLOW



Proposed New Requirements for Take-back

WHAT?

The systematic process by which organizations collect FSC-claimed products (used or unused) from customers after the initial sale and reintroduce them into the supply chain.



WHY?

- Current CoC standards do not address this model.
- Calls for more uniform requirements and circular approaches in CoC (e.g. reverse logistics)



HOW?

- formally integrated into the CoC standards.
- New requirements added under Section 4
- Traceability and eligibility assessment as core requirements



Promotes circularity in the CoC scheme & strengthening integrity of the FSC system

Proposed New Requirements for Leasing

WHAT?

FSC-certified products retain their original ownership and certification status while being leased to customers. At the end of lease, products return to the organization for further leasing.



WHY?

- FSC's current CoC standards focus on legal ownership transfer/sale.
- Promotes service provision and circular flow of products.



HOW?

- Creation of product-as-a-service certification options
- New requirement included under outsourcing and provision of service
- Traceability and eligibility assessment as core requirements



Offers a pathway for process-based certification and visibility in the FSC system

Sourcing Reclaimed Materials (New section 14)

SUPPLIER AUDIT PROGRAMME:

- Introduced exemption from SAP, whereby if the Organization's supplier has been audited in the same calendar year by their or an FSC-CB, they can be exempted from audit sample
- New definition of 'Supplier Audit', to ensure consistent understanding by CHs on when SA is needed

ANNEX 5:

- Simplified and restructured for clarity
- New examples of reclaimed natural rubber, forest-based textiles, cork and bamboo have been included.

ON-SITE USE OF MATERIAL:

- Removed limitation on on-site use of materials
- focused on process-based criteria (e.g., 'same manufacturing process')
- On-site use of reclaimed material permitted, provided it does not result in the exact/same product

CURRENT DEFINITION OF SALVAGED WOOD

Wood that was:

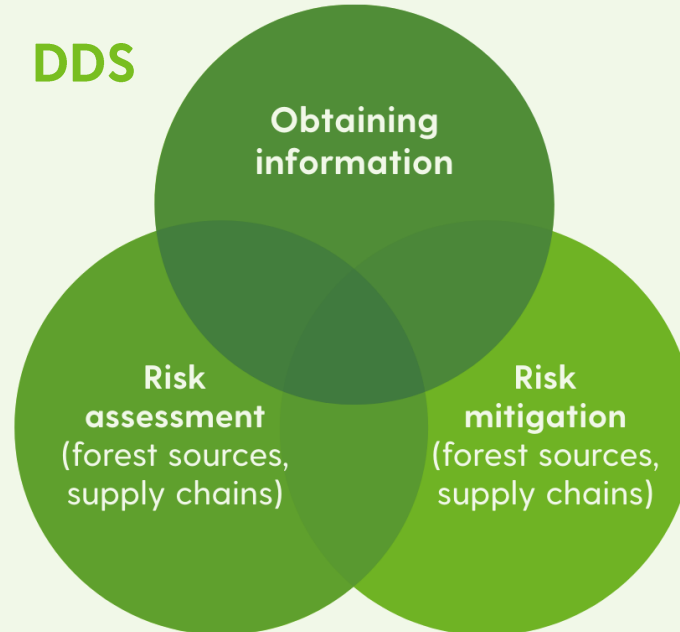
- naturally felled (e.g., by storm or snow);
- felled and subsequently lost or abandoned (e.g. logs that sank to the bottom of a river)
- felled for purposes other than wood production (e.g. urban harvested wood);
- submerged by water and abandoned as a consequence of artificial reservoirs and dam construction.

Salvaged wood is considered as virgin material and shall be assessed as controlled material or sold as FSC Controlled Wood.

Source: FSC-STD-40-004 V3-1

WHAT DOES 40-005 REQUIRE?

DDS



THE CHALLENGE?

40-005 application not feasible where wood is from outside forest matrix, so it's mostly excluded from the system or uncontrolled



PROPOSED CHANGE

Two types distinguished:

- Forest salvaged wood (40-005 applies)
- Non-forest salvaged wood (considered as neutral material)

Pre-consumer Reclaimed Wood: Consultation

Proposal A

- Allowing claim contribution for pre-consumer reclaimed wood in the FSC system
 - ❖ risk and benefits matrix consultation



Proposal B

Current situation

According to Clause 2.7 of FSC-STD-40-004 V3-1(2.9.1 V4-0 D1-0) organizations can reclaim material in their operations from certified inputs and classify them as:

- ❖ the input material (e.g., FSC Mix %/Credit) or,
- ❖ a lower material category.

Current limitation:

- Reclaimed materials classified as:
 - Input or lower material category → not eligible as input for FSC Recycled.
- If classified as pre-consumer → no claim contribution

Proposal

- Remove limitation by including requirements to section 2 & 14 of FSC-STD-40-004

Proposal B Scenario

Organization A

- Reclaims materials from secondary processing of certified FSC certified inputs
- Classifies the reclaimed material as the parent material (e.g., FSC Mix Credit).
- Organization A issues a declaration confirming the reclaimed status of the products though sold with the original claim (e.g., FSC Mix Credit/x%).

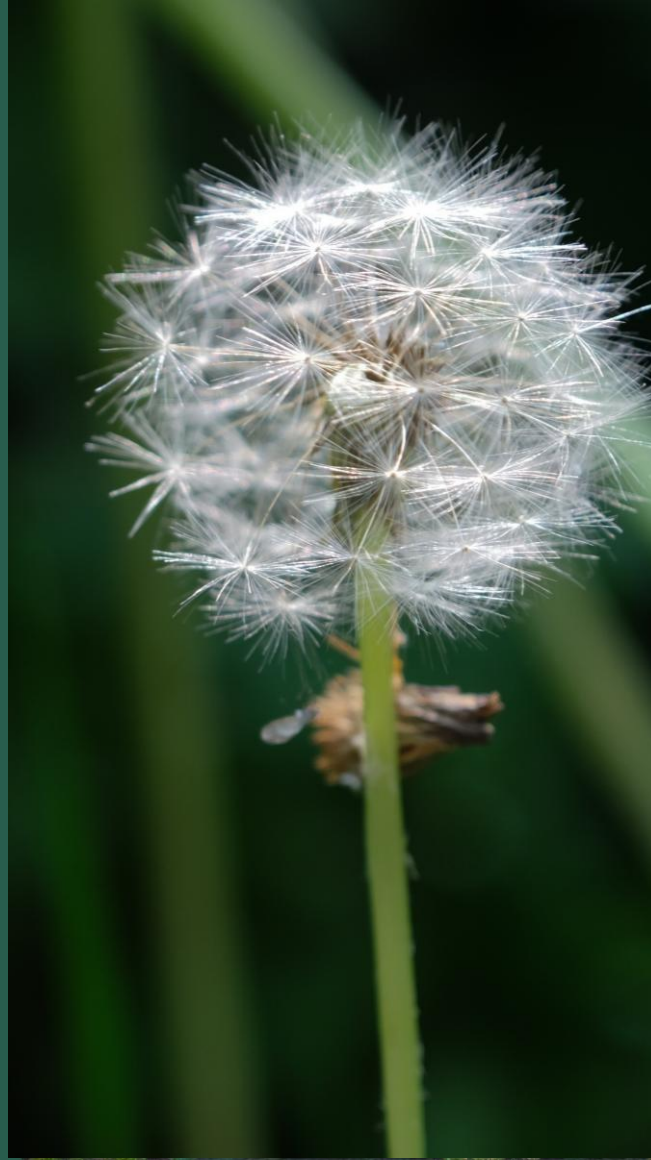
Organization B

- Purchases the reclaimed material from Organization A as claim contributing inputs.
- Verifies the supplier's information or declaration and confirm:
 - the type of product, and
 - supplier's activity involves secondary processing to ensure the material's eligibility.

Implementation:

creating exemption to the eligible inputs for FSC Recycled output claim; not only products *per se* classified as reclaimed, but also FSC-claimed materials that meet the definition of pre-consumer reclaimed materials

Workers' rights



Changes to Universal Requirements (Section 8)

CHILD LABOUR



- Discussion on ILO exceptions for developing countries (lowering age bar) & interpretation issues regarding the rights of under 15s to work in certain countries.
- WG support for reformatting to ensure consistent application but no lowering the minimum age limit below 13 (aligned with CP report).

DISCRIMINATION



- Discussion on potential change to elaborate on practices indicative of discrimination e.g., sexually coercive behavior, requirement for medical tests.

Changes to Universal Requirements (Section 8)



FORCED LABOUR

The organization shall only use prison labour for any activities under the scope of an FSC CoC certification, including any outsourcing, if the work is voluntary with conditions of employment approximate to those of a free labour relationship.

Discussion on the exclusion of prison labour:

- entirely OR
- conditional use, with reference to ILO guidance and wording of Article 2c) in Convention No. 29.



FREEDOM OF ASSOCIATION

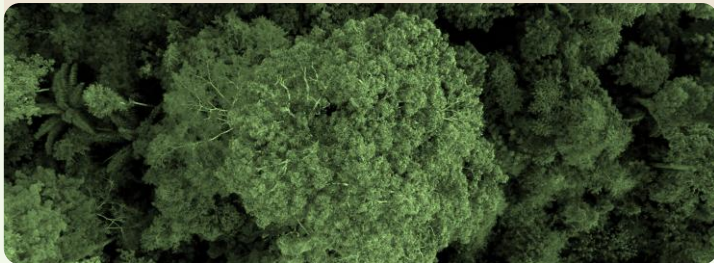
The Organization shall provide workers' representatives (including trade union representatives) access to the workplace at first instance, where such access is necessary to fulfil their representative function including communication with workers on unionization.

NOTE: The exercise of this right by representative(s) is with due respect to rights of property and management and not at the detriment of the efficient functioning of The Organization.

Changes to Occupational Health & Safety (OHAS)

WHAT?

- Enhancement of OHAS requirements (Clause 1.4)
- Inclusion of Motion 51/2021 (worker-elected health & safety representatives)



WHY?

- Inclusion as ILO fundamental right (Alignment)
- Motion implementation required



HOW?

Options

- 1) Within Section 1; OR
- 2) Within Section 7 as a 'core labour requirement'



Other Changes in STD-40-004 V4-0



RELEVANT CLAUSES COMBINED

FSC CLR:

- Self-assessment
- Policy
- FSC equivalent schemes.



CLR ONLY IN SECTION 8

Legal compliance moved to Section 1.



UPDATED SELF-ASSESSMENT

Repetition and obsolete references removed.

WHICH REFERENCES WERE INCORPORATED?

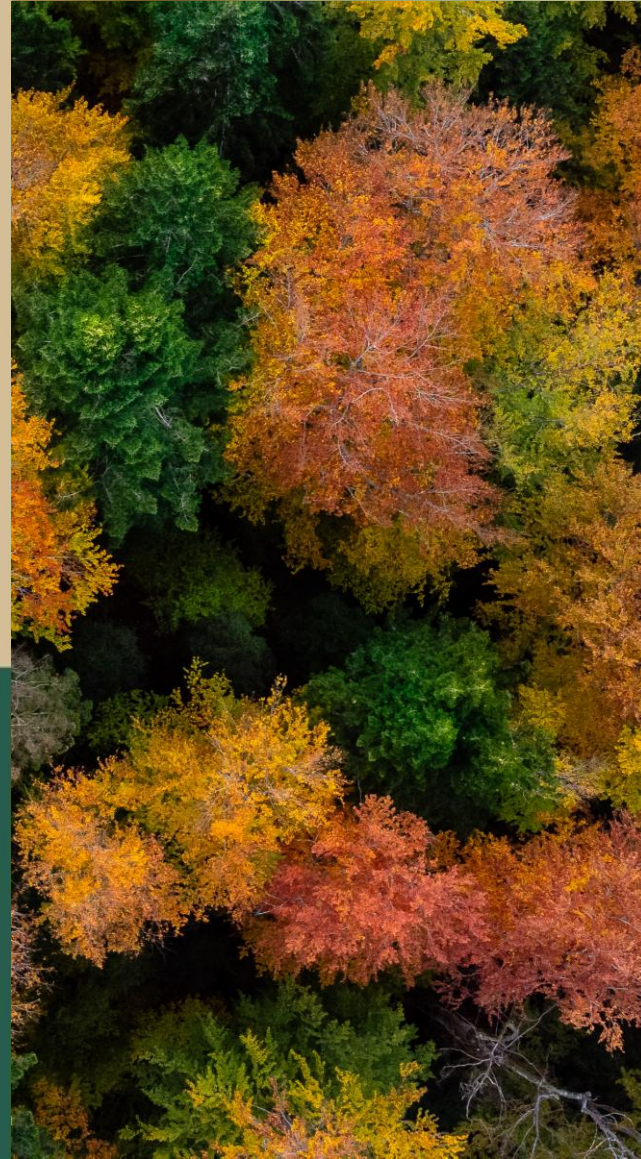
Including:

- INT-40-004_64: ensuring policies in language understood by workers
- INT-40-004_68: exempting companies without workers
- ADVICE-40-004-24: exempting FSC-approved schemes

WHERE WILL THE GUIDANCE GO?

Relevant guidance (previously Annex D) will be moved to a non-normative guidance to support stakeholders.

Evaluation requirements



Changes to FSC CLR Evaluation (Sections 12 and 14)

Proposals

- Risk based approach to determine further evaluation based on FSC-defined classifications
- Adoption of concepts (from ADVICE-40-004-23 and ADVICE-20-011-16) for Organizations and contractors



Including:



LOWER CLASSIFICATION

Indicators to reduce classification including past performance (NCs) and audit e.g., third-party



SAMPLING

Sampling formulae for worker interviews for 'medium' and 'high'



GROUP INTERVIEWS

Explicitly permitted at CB discretion if confidentiality ensured.

RATIONALE:



- More level-playing field for evaluation at both Organization and contractors through more specific rules for all.

FSC CLR Risk Matrix

WHAT?

It's a table providing a risk classification per FSC CLR per country/territory.

WHY?

To provide one source for country-level risk classification per FSC CLR, to be used to determine further evaluation.

HOW?

Developed through review of publicly available data sets and reports, with each country assigned a risk classification of 'low', 'medium' or 'high'.



FSC CLR Risk Matrix: Example Countries*



202 countries/territories are currently proposed within the FSC CLR Risk Matrix using **8 publicly available sources**.

Country/Territory	Child Labour	Forced Labour	Discrimination	Freedom of Association
Colombia	Low	Medium	High	High
Italy	a.Low	Medium	Low	Low
Uganda	High	High	High	High

‘a.’ prefix stands for a classification that has been amended due to missing data.

Application of the FSC CLR Risk Matrix (Example)

Forced Labour: Medium applied for evaluating the Organization

1. Is there a justification to lower this classification for the Organization i.e., through their NC history or because they already have a 3rd party audit?

Yes

If yes, this could be lowered to “low”



Low, with no issues =
No further evaluation

No

If no, this stays at “medium”



Check the self-assessment for completeness and any issues of conformity

Medium =
Evaluate for “medium”
(Documentation review + worker
interviews applying sampling formula:
 $y = 0.5 \sqrt{x}$)

REMOTE AND HYBRID AUDIT

Remote & Hybrid Audits

New definitions for 'remote' and 'hybrid' audits (emphasis on using ICT)

PRE-REQUISITES FOR REMOTE & HYBRID:



CB & CH to have secure and confidential access for reviewing documents and interviewing workers



Access to information and communication technology (ICT) by CB & CH



PRE-REQUISITES FOR FULLY REMOTE:



Low-risk



No substantiated complaints or unresolved disputes / public cases



No major NCs in past 3 years that would require on-site evaluation of corrective actions



No False Claims incident in last 5 years

Main evaluations & Re-evaluations: always on-site audit

(except for traders without physical possession)



Low-risk organizations:



SITES

- Without physical possession (e.g., sales office); **or**
- With physical possession of finished and labelled products



PROCESSORS

- Physical possession and transformation of products by FSC-certified contractors; **or**
- Exclusively handling FSC-claimed material or claim contributing material (or both), physical segregation is not required



TRADERS

- Without physical possession; **or**
- With physical possession of only FSC-certified products



PROJECTS

Single delivery of materials to projects, and all project members supplying FSC-certified products

NOTE: Evaluation of high-risk contractors conducting above activities can also be conducted remotely.

DEROGATION REQUEST WAIVING AUDITS SURVEILLANCE

Proposed changes

Derogation requirement removed, annual surveillance, waiving audits

CB can conduct remote audit instead of on-site without submitting derogation requests if:

- ✓ demonstrated health and/or safety risk to auditors
- ✓ travel restrictions imposed by authorities
- ✓ demonstrated events of force majeure (e.g., wars, natural disasters, etc)



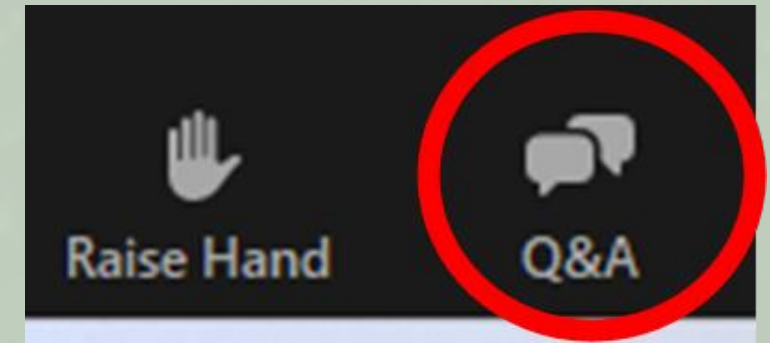
Annual surveillance audits

Within 15 months, may be postponed **by one month** to the next calendar year within the limits of 15 months

Waiving audits

- ✓ **Only if** CH did not label, sell any certified or FSC CW or did not source controlled material
- ✓ **Not allowed if** CH is designated as having “high integrity risks”
- ✓ **Not allowed if** a new/revised standard is effective

Q&A



You can like (👍) a question submitted by other participants to add priority for it to be answered

Stay engaged in the process!

Consultation is open 15 November 2025 – 25 January 2026



Visit the Consultation Platform to participate
(English and Spanish [here](#); French [here](#))



Visit the Revision Webpage and Process Webpage for more information



Reach out to chainofcustody@fsc.org with questions

Thank you!

Do you have a spare minute to rate this webinar out of 5 stars?

Access our feedback form via the QR code:



Or click on the link below:

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Forest Stewardship Council®

FSC® International Center



Adenauerallee 134, 53113 Bonn, Germany

T +49 (0) 228 367 66-0

F +49 (0) 228 367 66-65

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