

CONSULTATION MATERIAL FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

FSC-STD-40-004 V4-0 D2-0

Sections	Background information & Key changes from D1-0	Questions
Scope	<p>Changes in this section include:</p> <ul style="list-style-type: none">• Mixing NTFP and wood-based product: the distinguishability element is removed and one scenario proposed. If NTFP and wood-based products are mixed, the wood-based component must be certified and the NTFP may not be, provided that the label refers to the wood-based component	<p>1a. Do you agree with the revised requirements? Agree, neutral, disagree</p> <p>1b. Provide rationale or suggestions for improvement.</p>
Section 1	<p>Changes in this section include:</p> <ul style="list-style-type: none">• Clause 1.6: requires mandatory use of traceability systems for 'high-risk' material (as defined by FSC in a number of advice notes. This information can also be found on CoC Hub)• All health and safety and FSC CLR requirements have been moved to Section 8 (see Section 8 for questions relating to these changes). <p>Consultation note: FSC-PRO-10-008 Complaints and Appeals Procedures is under revision and upon publication, it will be applicable to FSC certificate holders.</p> <p>High-risk supply chains</p> <p>FSC's interventions to ensure the integrity of certified supply chains involves investigations of entire supply chains. The resulting substantive investigative evidence is the basis determining for identifying high-risk supply chains and</p>	<p>2a. Do you consider clause 1.6 clear and auditable? Agree, neutral, disagree</p> <p>2b. Provide rationale or suggestions for improvement.</p> <p>3a. As FSC's current approach to determining high risk in supply chains is reactive, based on investigations that concluded an unacceptable level of past fraud, should FSC consider more proactive metrics in how it determines high-risk supply chains? (yes/ no)</p> <p>3b. If yes, what additional metrics or benchmarks should be considered to enhance the integrity of the high-risk supply chain concept? (Example of additional metrics or benchmarks could be</p>

determining the applicable measures to address such risks (through advice notes). Evidence shows the advice notes are effective in preventing false claims.

Transparency International corruption metrics, IUCN red list, CITES list of timber species, etc.).

3c. If your answer is no, do you consider the current method of determining high-risk supply chains through past integrity investigations and transaction verification loops sufficient? Please include an explanation in your response.

3d. Should a high-risk supply chain undergo risk reduction (i.e., supply chain de-risking)? (yes/no)

3e. If yes, what criteria and timeframe should apply?

Section 2

Changes in this section include:

- **Ecosystem service claims:** as an 'add on' claim and similar to 'FSC Regulatory' claim, these claims can be passed to downstream organizations. This change is due to alignment with the revised version of the procedure FSC-PRO-30-006.
- **FSC pre-consumer and Pre-consumer+:**

Two proposals were consulted on this topic during the D1-0 consultation. A range of concerns and suggestions were received (see D1-0 consultation report). Weighing the concerns and feedback, two categories have been included in D2-0.

Proposal A - Outcome

Only pre-consumer reclaimed wood that is officially classified as waste is proposed to be eligible for full claim contribution.

D2-0 change: (see updated tables, 1, 3, 4, 7)

4a. Do you agree with including ES claims in CoC standards? Agree, neutral, disagree

4b. Provide rationale or suggestions for improvement.

Pre-consumer+

5a. Do you agree with the proposal A outcome. (Agree, Neutral, Disagree)

5b. Provide rationale or suggestions for improvement

6. What official documentation or equivalent legal proof demonstrates that a pre-consumer material supply is legally classified as waste in your country or region of operation (i.e. documentation issued or recognised by a competent authority)?

Introduction of **Pre-consumer+** (see definition in Draft D2-0 'Terms and Definitions').

#This definition does not affect paper. All other materials that do not meet this definition remain classified as "pre-consumer wood" with no claim contribution.

Proposal B - outcome

Pre-consumer reclaimed material derived from one or more eligible inputs can be sold with an FSC Pre-consumer claim.

D2-0 change: (see updated tables 1, 3, 4, 7)

Introduction of **FSC Pre-consumer** claim (see definition in Draft D2-0 'Terms and Definitions')

#Equivalent claim contribution percentage or credit based on the certified inputs shall apply to quantities of materials reclaimed (FSC Pre-consumer x% / Credit).

FSC pre-consumer

7a. Do you agree with the proposal B outcome. (Agree, Neutral, Disagree)

7b. Provide rationale or suggestions for improvement.

Section 3 No change in this section

Section 4 Changes in this section focus on the take-back requirements (following consultation feedback and an industry desk test):

- products must be identified using objective evidence, without prescribing specific unique identifiers;
- product condition requirements now focus on ensuring that no ineligible inputs are used and that the product type remains unchanged, with minor maintenances allowed.
- take-back agreements have been removed, as these are already addressed under Clause 4.2 on product eligibility; and

8a. Do you agree with the revised requirements? Agree, neutral, disagree

8b. Provide rationale or suggestions for improvement.

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- volume reconciliation requirements have been merged under Section 5 which covers volume accounting.
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Section 5 Changes in this section include:

- Annual summary can be provided in any unit by all certificate holders.

9a. Do you agree with the revised requirements?
Agree, neutral, disagree

9b. Provide rationale or suggestions for improvement.

Section 6 Changes in this section include:

- FSC CFM and FSC CW can be sold to non-certified organizations and allowed to be sold as finished products
- The concept of CW certification code is removed (FSC-STD-20-001 will be aligned with this change)

10a. Do you agree with the revised requirements?
Agree, neutral, disagree

10b. Provide rationale or suggestions for improvement.

Section 7 No change in this section

Section 8 Changes in this section include:

- Section renamed to 'Health, safety, and labour requirements', retaining sub-headings for elements of health and safety, and FSC CLR.

Health and Safety

- Health and safety requirements moved from Section 1 and consolidated (Clauses 8.1-8.1.1), however remains not considered as an FSC CLR.
- Text to incorporate Member Motion 51/2021 amended (Clause 8.1 e))

FSC CLR

11a. Do you agree with the provision of health and safety and FSC CLR in one consolidated section?
Agree, neutral, disagree

11b. Provide rationale or suggestions for improvement.

12a. Do you agree with the following statement: *health and safety should be considered as a FSC CLR, requiring policy commitment, self-assessment, and should apply to contractors, just like the current four FSC CLR?* Agree, neutral, disagree

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- Previous requirements from Section 1 moved and amended (Clause 8.2):
 - Requirement to provide information on self-assessment amended to require only FSC CLR classified as “high risk” on FSC CLR Risk Matrix (Clause 8.2 b))
 - More elaboration on exception for organizations with ‘no workers’ (Clause 8.2.1)
 - Text to incorporate Member Motion 50/2021 amended to provide the access right to workers rather than ‘workplace’, and more elaboration in attached Note (Clause 8.6.2)

12b. Provide rationale or suggestions for why you agree or disagree with this statement.

13. If H&S was included as an FSC CLR, are you aware of or would recommend any international datasets or rankings on H&S, to help create the FSC CLR Matrix classifications for countries without any FSC risk assessments? Please list them.

14a. Do you consider that the text to incorporate Motion 51 on the election of health and safety representatives (Clause 8.1 e)) is understandable and implementable? Agree, neutral, disagree

14b. Provide suggestions for how the text could be improved to ensure it is understandable and implementable.

15a. Do you support the new proposal to provide only information in the self-assessment for FSC CLR classified as “high risk” based on the FSC CLR Risk Matrix? Agree, neutral, disagree

15b. Provide rationale or suggestions for improvement.

16a. Do you consider that the text to incorporate Motion 50 on access to workers (Clause 8.6.2) is understandable and implementable? Agree, neutral, disagree

16b. Provide suggestions for how the text could be improved to ensure it is understandable and implementable.

		17. Please provide any other comments you have regarding Section 8 changes. For any comments, please specify the clause(s) or element(s) you are referencing.
Section 9	<p>Changes in this section include:</p> <ul style="list-style-type: none"> • Table 3 is revised to regulate combination of 'FSC Pre-consumer' and 'pre-consumer+' under the transfer system; • Examples added under table 3 to clarify different scenarios for mixing FSC CFM. 	<p>18a. Do you agree with the revised requirements? Agree, neutral, disagree</p> <p>18b. Provide rationale or suggestions for improvement.</p>
Section 10	No change in this section	
Section 11	<p>Changes in this section include:</p> <ul style="list-style-type: none"> • Organizations are not required to establish a CW credit account – CW does not carry a 'credit value'; sales of such materials are controlled via accounting records. • Clause 11.10 and the corresponding note have been removed. 	<p>19a. Do you agree with the revised requirements? Agree, neutral, disagree</p> <p>19b. Provide rationale or suggestions for improvement.</p>
Section 12	<p>Changes in this section include:</p> <ul style="list-style-type: none"> • FSC CFM can be labelled, using FSC Mix label • Clause 12.2 added to regulate the use of FSC label on products/ components that are used as part of manufacturing another product 	<p>20a. Do you agree with the revised requirements? Agree, neutral, disagree</p> <p>20b. Provide rationale or suggestions for improvement.</p>
Section 13	<p>Changes in this section include:</p> <ul style="list-style-type: none"> • Additional clarification on what are not considered outsourcing activities (Clause 13.1, Note 2) 	<p>21a. Do you agree with the revised requirements? Agree, neutral, disagree</p>

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- For further outsourcing (Clause 13.6), other mechanisms to inform The Organization, the contractor and subcontractor are acceptable
 - Provision of services parts moved to new Section 14

21b. Provide rationale or suggestions for improvement.

FSC CLR changes (Clauses 13.8 - 13.9):

- Self-assessment requirement only for uncertified contractors with FSC CLR classified as “high risk” on FSC CLR Risk Matrix
- Removal of “first-party audit” as potential evidence for the risk classification of outsourcing agreements by the certification body.

Section 14 The requirements applicable to organizations providing services have been separated from the outsourcing section following stakeholder feedback, to avoid confusion. The new Section 14 focuses on certified organizations providing services, including a dedicated applicability box. There have been no changes to the requirements.

Section 15 Changes in this section include:

- Relocation of the leasing requirements from section 13 to a new section 15 as stakeholders indicated it confusion with the outsourcing section.
- products must be identified using objective evidence, without prescribing specific unique identifiers;
- product condition requirements now focus on ensuring that no ineligible inputs are used and that the product type remains unchanged, with minor maintenances allowed;
- previous clauses 13.3.5 and 13.3.6 (new clause 15.3) have been merged.

22a. Do you agree with the revised requirements?
Agree, neutral, disagree

22b. Provide rationale or suggestions for improvement.

D2-0 has incorporated the feedback from the industry desk test as well as consultation results

Section 16

Changes in this section include:

- removal of a repeated statement in the applicability box that was already covered by the requirements;
- deletion of the note under Clause 16.1, as it was reported to cause confusion and its intent is sufficiently addressed through existing requirements and definitions.
- replacement of the term 'same calendar year' in previous Clause 14.8 (now Clause 16.8) with '12-month' aligning it with the audit cycle and clarifying the intended exemption for suppliers audited by an FSC-accredited certification body since the last audit.

Non-forest-based wood

Divergent views have been expressed regarding the non-forest salvaged wood proposals consulted (see details in the D1-0 consultation report).

D2-0 Changes

For the D2-0 consultation, the term and definition of 'non-forest salvaged wood' have been revised, and such material is required to be assessed as controlled material, in accordance with FSC-STD-40-005. (see definition of 'Non-forest-based' wood in D2-0 'Terms and Definitions').

Note: Research and development to explore the potential consideration of this material as a claim-contributing input within the FSC system has been proposed. The R&D would aim to examine stakeholder concerns and inform future consideration by FSC decision-making bodies on its classification and usage as claim contributing input in the FSC system.

23a. Do you agree with the revised requirements?
Agree, neutral, disagree

23b. Provide rationale or suggestions for improvement.

24a. Do you agree with the proposed changes?
Agree, Neutral, Disagree

24b. Provide rationale or suggestions for improvement.

Section 17

Changes in this section include:

25. Do you agree with the proposed changes?
(Agree, Neutral, Disagree)

- Single certification is defined closely with the site and sub-site definitions. Amendments are made to both clause 17.1 and the definitions of site and sub-site.
- Clause 17.4 introduced to clarify the authority and enforcement rights of a multi-site central office.
- Group certification is restricted to within the same country as the central office, and it's clarified that all sites are subject to a common CoC management system (Clause 17.6).
- Maximum 'total annual turnover' instead of 'annual forest product turnover', with the USA as the exception. Since 2024, the USA has had an approved 'forest product turnover' of USD 10,000,000. With the global restriction on 'annual turnover', some participants of group certifications in the USA may face a challenge. To minimize the negative impacts, the working group agreed to provide an exemption for the USA market in D2-0 (Clause 17.6, and relevant footnote).

NOTE: additional questions on Group certification are included in section 7 of FSC-STD-20-011 (questions 2a, 2b).

26a. Which aspect(s) would you like to suggest for further improvement? Please select the answers and provide your details in Question 26b below.

- Single certification eligibility criteria
- Site and sub-site definitions
- Multi-site certification eligibility criteria
- Group certification eligibility criteria

26b. Please provide a rationale or suggestions for improvement. Please include the clause number, any potential practical constraints, and the stakeholder groups affected.

27 a. In consideration of the proposed changes to Group CoC certification, do you see the need to introduce further or alternative changes, in particular in relation to the integrity of the group certification model? (yes/ no)

27 b. If yes, what additional or alternative measures could be introduced enhancing the integrity of group certification without jeopardizing its affordability for small enterprises?

Section 18 Changes in this section include:

1. Central office management system and group size at entry

- A new requirement is introduced for the central office to define a maximum number of participating sites at the time of initial certification (Clause 18.2.1)

The following three options are under consideration:

28. Of the following three options, which maximum participating site threshold for initial certification of a new group certificate would you support?

(20/50/100/other)

29a. The changes to subsite(s) and contractors' evaluation at the central office level (Clause 18.4.2) are in line with CB's requirements. Do you

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- **100 participating sites:** Suggested as a threshold, as it is assumed that groups under 100 participating sites may be reasonably managed with more basic group management systems/tools (e.g., Excel Worksheets).
 - **50 participating sites:** Suggested to provide a middle ground between the 100 and 20 participating sites.
 - **20 participating sites:** Suggested to align with the threshold set for extra requirements for the central office's auditors and certification body thresholds for defining the growth limit for the central office.

agree with these changes? Agree, Neutral, Disagree

29b. Please provide rationale or suggestions for improvement.

2. Central Office Audit Programme – Clause 18.4.2

New requirements are introduced for the central office to:

- conduct internal audits of all participating sites (subsites) annually, regardless of external audit participation (formal audit waivers as a result of inactivity still possible); and
- Annual internal audits must include a sampled review of high-risk contractors (risk level assigned by CB) associated with participating sites that follows CB-level audit sampling methodology.

3. Administrative and Qualification Requirements

Amendments to multi-site and group certification requirements include:

- Administrative requirements: Removed a clause excluding the internal auditing activities in case the participating site acts as the central office, because this site is considered one of the participating sites and shall be deemed for annual internal audit.
- Central office qualification does not focus solely on an individual central office manager but can also apply to a managing team responsible for overseeing the participating sites and launching the central office audit program (Clause 18.3.1).

Annex 1 The requirements in this annex may be moved to TLA.

Annex 2 Changes in this section include:

- Inaccurate claims are distinguished from False Claims
- After 2 non-deliberate False Claims in 5 years, instead of mandatory use of FSC Trace, CBs will be required to apply Annex 4 of FSC-STD-20-001 V5-0
- After 3 non-deliberate False Claims in 5 years, CHs will be subjected to additional unannounced audits. If the CH does not accept, they will be blocked by FSC
- First self-declared False Claim will not be counted for escalation
- Mandatory use of 'FSC Trace' is removed

30a. Do you agree with the revised requirements?
Agree, neutral, disagree

30b. Provide rationale or suggestions for improvement.

Annex 3 Changes in this Annex 3 include:

- Additional information provided in the Informative Guidance box.
- Format and questions adjusted.

The self-assessment template will be made available as a template, separate to the Standard for the implementation, so this can be more easily accessed and used by stakeholders.

31a. Do you agree that the revisions to self-assessment make it clearer and more user-friendly than the version in the current standard (V3-1)? Agree, neutral, disagree

31b. Provide rationale or suggestions for improvement.

Annex 4 Changes in this section include:

1. adding clarity on central office's role and alignment with 20-001:
 - Clause 1.6: the central office is required to document the participating site's nonconformity.

32a. Do you agree with the change in Annex 4?
Agree, Neutral, Disagree

32b. Provide rationale or suggestions for improvement.

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- Clause 1.5, 1.10: the central office is required to present the audit findings to the participating site, and share final evaluation report to participating site.
 - Clause 1.7: set a timeline for the issuance of non-conformity and making a decision whether to include, maintain, reinstate, or suspend the participating site after the audit closing meeting. Also, closed nonconformity is identified.
2. Remote and hybrid audits: Amendment to align with FSC-STD-20-011
 3. New section: evaluation of FSC CLR to align with FSC-STD-20-011
 4. New section: Sampling of contractors operating under outsourcing agreements to align with FSC-STD-20-011.
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**(former
Annex 5)**

Annex 5 (from D1-0) is informative and is intended to illustrate examples of reclaimed materials according to the definitions and the scope explained in section 14. Some stakeholders have perceived the examples as prescriptive, which is not the intent. To avoid misinterpretation, Annex 5 will be incorporated into the accompanying guidance document, to be published alongside the standard.

**Terms &
Definitions**

Changed/new definitions are:

- Ecosystem services claims (added)
 - FSC CLR Risk Matrix (added)
 - First-party audit (removed)
 - Inaccurate claims (added)
 - Primary manufacturer (amended)
 - Product group (amended)
 - Pre-consumer+ (added)
 - Non-forest-based wood (amended)
 - Site/sub-site (amended)
 - Transformation (amended)
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33a. Do you agree with the revised requirements?
Agree, neutral, disagree

33b. Provide rationale or suggestions for improvement. Please include clear indication on the terms you are commenting on.

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- Workers (amended)
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Certifying
construction
projects
against
FSC-STD-
40-004

Proposal to address issue in certifying construction projects against FSC-STD-40-004

FSC has received feedback from certificate holders with respect to a certain issue they encounter when implementing the requirements of FSC-STD-40-004 for projects in the construction sector.

This issue, and two alternative proposed solutions, are outlined below. FSC is seeking feedback through this consultation regarding the proposed solutions.

As per INT-STD-40-004_58, *“Organizations should apply FSC-STD-40-006 for the certification of single and multiple projects. However, organizations can opt to apply FSC-STD-40-004 in case it is more adequate for their needs.”*

If an organization opts to apply FSC-STD-40-004 for the certification of a construction project, there are different views amongst certification bodies and certificate holders with respect to how Forest Product Turnover (FPT) should be calculated, which directly impacts the Annual Administration Fee (AAF). Some are of the view that the FPT should be calculated based on the use of individual forest-based components in a construction project; others are of the view that the FPT should be calculated based on the project as a whole (and not the individual forest-based components used in the project).

FSC has identified three possible alternative solutions:

- **Option A:** Introduce a new requirement in FSC-STD-40-004, requiring that where a certificate holder is certified against FSC-STD-40-004 for a construction project, the certificate holder shall define in its scope of activities the particular forest-based components to be used in the construction project. The FPT shall then be calculated based on the use of individual forest-based components in the project.

34a. Do you agree with the proposed solution in Option A? Agree, neutral, disagree

34b. Provide rationale or suggestions for improvement.

35a. Do you agree with the proposed solution in Option B? Agree, neutral, disagree

35b. Provide rationale or suggestions for improvement.

36a. Do you agree with the proposed solution in Option C? Agree, neutral, disagree

36b. Provide rationale or suggestions for improvement.

- **Option B:** Introduce a new requirement in FSC-STD-40-004 and associated procedures, stipulating that where a certificate holder is certified against FSC-STD-40-004 for a construction project, the FPT will be calculated based on the project as a whole.

- **Option C:** Introduce a new requirement in FSC-STD-40-004 and associated procedures, stipulating that where a certificate holder is certified against FSC-STD-40-004 for a construction project, the certificate holder shall define in its scope of activities the particular forest-based components to be used in the construction project. The FPT shall then be calculated based on the use of individual forest-based components in the project, **unless** the total amount of individual forest-based components used in the project exceeds a certain threshold (e.g. 70%), in which case the FPT shall be calculated based on the project as a whole.

FSC-STD-20-011 V4-4 D2-0

Sections	Background information & Key changes from D1-0	Questions
Section 1	No change in this section	
Section 2	No change in this section	
Section 3	No change in this section	
Section 4	No change in this section	
Section 5	No change in this section	
Section 6	No change in this section	
Section 7	<p>Changes in this section include:</p> <p>1. Sampling formula for group and multi-site certification:</p> <ul style="list-style-type: none">• More participating sites, higher risk index: The risk index value is set to 0.7 for certification with more than 1000 participating sites.• The sampling formula sets the minimum number of participating sites selected, instead of a fixed number of participating sites per evaluation. This means the certification body can increase the number of samples, if needed, to verify the performance quality of the central office (Clause 7.7) <p>2. Removal of methodology for auditing group certification operating in multiple countries</p>	<p>1a. Do you agree with the change in Section 7? Agree, Neutral, Disagree</p> <p>1b. Provide rationale or suggestions for improvement.</p> <p>2 a. In consideration of the proposed changes to Group CoC certification, do you see the need to introduce further or alternative changes, in particular in relation to the integrity of the group certification model? (yes/ no)</p> <p>2 b. If yes, what additional or alternative measures could be introduced enhancing the</p>

- In alignment with changes in FSC-STD-40-004 V4-0 D2-0 on removing the option for 'establishing a group scheme across more than one country', this clause is removed

integrity of group certification without jeopardizing its affordability for small enterprises?

Section 8

No change in this section

Section 9

Proposal to address issue in certifying construction projects against FSC-STD-40-004

FSC has received feedback from stakeholders with respect to a certain issue they encounter when evaluating Certificate Holders certified against FSC-STD-40-004 for projects in the construction sector.

This issue, and two alternative proposed solutions, are outlined below. FSC is seeking feedback through this consultation regarding the proposed solutions.

As per INT-STD-40-004_58, "*Organizations should apply FSC-STD-40-006 for the certification of single and multiple projects. However, organizations can opt to apply FSC-STD-40-004 in case it is more adequate for their needs.*"

If an organization opts to apply FSC-STD-40-004 for the certification of a construction project, it is currently unclear how the certification body shall sample the project sites.

FSC has identified two possible alternative solutions:

- **Option A:** Introduce a new requirement in FSC-STD-20-011, requiring that certification bodies shall sample project sites certified under FSC-STD-40-004 using the same methodology as for sites of group and multi-site CoC certification (see clause 7.7 of FSC-STD-20-011 V4-4 D2-0).
- **Option B:** Introduce a new requirement in FSC-STD-20-011, requiring that certification bodies shall sample project sites certified under FSC-STD-40-004 using the same methodology as for project sites certified under FSC-STD-40-006 - i.e.:

3a. Do you agree with the proposed solution in Option A? Agree, neutral, disagree

3b. Provide rationale or suggestions for improvement.

4a. Do you agree with the proposed solution in Option B? Agree, neutral, disagree

4b. Provide rationale or suggestions for improvement.

$$y = 0.8 \sqrt{x}, \text{ where:}$$

y = minimum number of project sites to be audited, rounded to the next upper whole number

x = total number of project sites (ongoing and the ones that have been finalized in the period since the last evaluation)”

Section 10 No change in this section

Section 11 Changes in this section include:

- Requirement for informing ‘FSC Fibre Testing programme’ is removed

Section 12 Changes in this section include:

High-risk on risk of mixing criteria:

- Criterion on ‘being involved for activities critical for the development and maintenance of the CoC management system’ is removed.
- Acceptable criteria for ‘lowering the classification’ is added.

High-risk on CLR criteria:

- Reformatted to mirror the risk of mixing text.
- Lowering classification adjusted to permit only “second-/third-party audit”, aligning with the requirements for the Organization in Section 14; “first-party audit” was removed.

Sampling methodology

- High-risk contractors are not eligible for ‘remote audit’
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5a. Do you agree with the revised requirements? Agree, neutral, disagree

5b. Provide rationale or suggestions for improvement.

6. What other criteria should be added to reclassify risk of mixing from “high” to “low”?

7. Describe any aspects of the evaluation of FSC CLR for contractors that could be made clearer.

Section 13

No change in this section

Section 14**Evaluation of FSC CLR**

Changes in this section include:

- Reference to the newly defined 'FSC CLR Risk Matrix'
- Clarified exemptions (Clause 14.2) to mirror changes in FSC-STD-40-004
- Reformatting and amendment to lowering the risk classification, including the change to permit "second-/third-party audit", to mirror the contractor requirements.
- Amendment of the self-assessment evaluation to specify focus on FSC CLR elements classified as "high risk"
- Amendment to the formula for determining number of workers to interview, by provision of permission to lower if the certification body's sample includes worker representatives.

8a. Do you consider the approach for FSC CLR evaluation using the FSC CLR Matrix easy to understand? Agree, neutral, disagree

8b. Provide rationale or suggestions for improvement.

9. Describe the elements of the FSC CLR Risk Matrix you consider would require further explanation.

10a. Do you agree with the revised requirements in Section 14? Agree, neutral, disagree

10b. Provide rationale or suggestions for improvement.

11a. Do you agree that for the lowering of the classification, only major nonconformities are considered (Clause 14.3 b))? Agree, neutral, disagree

11b. Provide rationale or suggestions for alternatives.

12. Would you support the provision of examples of what constitutes a major non-conformity for FSC CLR to be provided as guidance alongside the publication of the revised standard? Agree, neutral, disagree

Section 15	No change in this section	
Section 16	No change in this section	
Section 17	Changes in this section include: <ul style="list-style-type: none"> • Due to removal of CW code, clause 17.2 is removed 	
Section 18	No change in this section	
Section 19	No change in this section	
Annex 1	Changes in this annex include: <ul style="list-style-type: none"> • Separation of scope of FSC-STD-40-004 and FSC-STD-40-006 	
Annex 2	No change in this annex	
Annex 3	No change in this annex	
Annex 4	Changes in this annex include: <ul style="list-style-type: none"> • Minimum audit duration per certification scope defined 	<p>13a. Do you agree with the revised requirements (Table 3)? Agree, neutral, disagree</p> <p>13b. Provide rationale or suggestions for improvement.</p>

Annex 5

Changes in this annex include:

Clause 1.1 revised to add clarity

Clause 2.3.a) revise to indicate the complaints or disputes that CB is aware of.

NOTE below clause 2.4.1 added examples of activities that may be needed to be audited on-site

Table 4 is revised, 'site' row is removed and the content is added under the categories of 'trader', 'processor' and 'projects'.

14a. Do you agree with the revised requirements? Agree, neutral, disagree

14b. Provide rationale or suggestions for improvement.

Annex 6

Changes in this annex include:

- Requirements for addressing 'inaccurate claims' Vs. 'False Claims' distinguished
- CBs are required to implement requirements in Annex 4 of FSC-STD-20-001 V5-0 after 2 'non-deliberate false claims'
- CBs are required to conduct additional 'unannounced audits' for a specified duration from 3 to 9 months after the regular audits. FSC-PRO-10-003 will be used to determine the duration of unannounced audits. If the CH does not accept, FSC will block the organization for the same period.

Consultation note: Procedure <FSC-PRO-10-003 Calculating Financial Penalty/Compensation Fee and Processing Evidence for Blocked Organizations> will be updated to reflect the changes made in FSC-STD-40-004 V4-0 and this standard.

15a. Do you agree with the revised requirements? Agree, neutral, disagree

15b. Provide rationale or suggestions for improvement.