

# CHAIN OF CUSTODY STANDARDS REVISION

Report

Consultation Report on the 1st Drafts of the  
Chain of Custody Standards



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FOREVER™**

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<b>Title:</b>	CHAIN OF CUSTODY STANDARDS REVISION
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<b>Date:</b>	15 May 2026
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<b>Objective of document:</b>	This report provides an overview of the stakeholder feedback on the D1-0 of FSC-STD-40-004 V4-0 and FSC-STD-20-011 V4-4.
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<b>Confidential?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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# INTRODUCTION

Forest Stewardship Council (FSC) is currently revising the Chain of Custody (CoC) standard *FSC-STD-40-004: Chain of Custody Certification* through a joint revision process. This process integrates and consolidates several related normative documents into a single, coherent standard, with the aim of improving clarity, consistency, and usability.

The revision brings together requirements and procedures from the following documents:

Code	Version	Title
<b>FSC-STD-40-004</b>	V3-1	<u>Chain of Custody Certification</u>
<b>FSC-STD-40-003</b>	V2-1	<u>Chain of Custody Certification of Multiple Sites</u>
<b>FSC-PRO-40-003</b>	V1-1	<u>Development of National Group Chain of Custody Eligibility Criteria</u>
<b>FSC-PRO-40-003a</b>	N/A	<u>List of Approved Group Chain of Custody Eligibility Criteria</u>
<b>FSC-STD-40-007</b>	V2-0	<u>Sourcing reclaimed material for use in FSC Product Groups or FSC Certified Projects</u>
<b>FSC-STD-20-011</b>	V4-2	<u>Chain of Custody Evaluations</u>
<b>FSC-PRO-20-001</b>	V1-1	<u>&lt;Evaluation of the organization’s commitment to FSC Values and occupational health and safety in the Chain of Custody</u>

Through this consolidation, FSC aims to streamline the normative framework by reducing duplication, aligning requirements, and enhancing the overall accessibility of the standard for users.

FSC CoC certification is designed to provide a credible assurance that products which are sold with an FSC claim originate from well-managed forests, controlled sources, reclaimed materials, or a mixture of these. FSC CoC certification thereby facilitates the transparent flow of goods made from such materials through the supply chain.

As part of this revision process, FSC conducted a public stakeholder consultation from 15 November 2025 to 25 January 2026. The consultation aimed to collect feedback on the first draft of the revised standard and ensure that stakeholder perspectives were systematically considered in its further development.

After the consultation period, a structured data analysis process was conducted to evaluate stakeholder feedback. Both quantitative and qualitative inputs were analysed and visualised through an interactive Power BI dashboard, enabling a comprehensive and accessible overview of the results. This approach supported transparent interpretation of the data and facilitated evidence-based discussions.

The analysed results were subsequently presented to the respective working groups, who reviewed stakeholder comments and worked to address the feedback in the next iteration of the standard. This

report presents the outcomes of the consultation, including key findings from the data analysis and how stakeholder input has informed the ongoing revision process.

The FSC team would like to thank all the participants for their feedback and valuable inputs to the topics consulted on.

For further information related to the revision process, please visit the dedicated webpage for the revision [here](#). For comments or questions related to the revision process, please contact [chainofcustody@fsc.org](mailto:chainofcustody@fsc.org).

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# Abbreviations

<b>AAF</b>	Annual Administration Fee
<b>ASI</b>	Assurance Services International
<b>CB</b>	Certification body
<b>CFM</b>	Controlled Forest Management
<b>CH</b>	Certificate holder
<b>CLR</b>	Core Labour Requirements
<b>CoC</b>	Chain of Custody
<b>CW</b>	Controlled Wood
<b>EUDR</b>	Regulation (European Union) 2023/1115 on Deforestation-free Products
<b>FM</b>	Forest Management
<b>FPT</b>	Forest Products Turnover
<b>FSC</b>	Forest Stewardship Council
<b>ILO</b>	International Labour Organization
<b>NTFP</b>	Non-Timber Forest Product
<b>OHAS/ OSH</b>	Occupational Health and Safety/Occupational Safety and Health
<b>USD</b>	United States Dollar
<b>WG</b>	Working Group

## METHODOLOGY

The consultation was presented digitally on the [FSC Consultation Platform](#) and made available in all official FSC languages: English, Spanish, and French. The report was presented alongside relevant questions per section, with additional supporting documents provided. These included copies of the relevant normative standards and procedures, the [Conceptual Phase Report](#), the [PSU Circularity Report](#), and the [Chain of Custody Workshop Synopsis Report](#).

### Stakeholder engagement

As part of the stakeholder engagement process, consultation materials were shared with FSC network partners on 31 October 2025 via the OneFSC Global Teams channel and FSC Intranet. These materials included an overview of the consultation, guidance for stakeholders on how to participate, the questions that would be uploaded to the consultation platform, and the draft normative documents.

Following the launch of the consultation on 15 November 2025, it was promoted to public stakeholders through various avenues, including a news item published on the FSC News Centre website.

Two Zoom webinars were held by FSC International on 18 and 27 November 2025, to present the key proposed changes to the CoC standards (169 attendees in the first webinar and 257 attendees in the second webinar) ,and recording of the webinar recording was subsequently published on FSC's YouTube channel (≈ 600 views by the end of the consultation time).

FSC International also hosted a Zoom Q&A session on 13 January 2026 and invited stakeholders to submit questions in advance to be answered live during the session with about 189 attendees.

Three emails were sent to a targeted list of individuals / companies who had previously signed up for updates about the CoC revision process (over 350 recipients) on 14 and 27 November 2025 and 13 January 2026, to invite them to register for the two webinars and the Q&A session.

Outreach efforts also included two posts on FSC's LinkedIn channel, published on 2 and 19 December 2025, inviting stakeholders to participate in the consultation and attend the webinars.

### Consultation questions

The consultation included 63 questions, multiple-choice (close-ended) and free text questions (open-ended). The close-ended questions mainly used a Likert-scale e.g. Agree, Neutral and Disagree, however there were also some binary options (e.g. yes or no), with the option of 'prefer not to say' or equivalent provided. All questions were voluntary to answer.

### Data analysis

Analysis of the results was conducted by FSC staff, with the initial data translated into English and any participants who provided zero answers removed. The work included a mixture of both quantitative and qualitative analysis. For the open-ended question types, all comments were reviewed and categorized by topic to provide an overview of the results by stakeholder group, region, and FSC membership type.

### Reference to stakeholder type

The stakeholder types provided in the initial results reflected the options provided on the FSC Consultation Platform. These included: ASI staff, Certificate holder, Certification body/auditor, Consultant, FSC International staff, FSC Member, FSC Network Partner staff, FSC Trademark service license holder, and Other.

Certain types have been grouped together to reduce the number of types and provide more concise analysis of results. The types that have been grouped are: FSC Network Partner and FSC International

Staff as 'FSC Staff', and FSC Trademark Service License Holder and Certificate Holder as 'Certificate Holder'.

For reference to FSC Member, readers should be aware that this is the stakeholder type chosen by the respondent. The number of responses of this type may not reflect the true number of FSC members, as other stakeholder types, such as Certificate holders or Certification body/auditor can also be FSC members.

## Interpreting the results

As all questions were voluntary to answer, there is some fluctuation in the number of responses for each question. Therefore, when reading the results for each question, the percentage provided is a percentage based on the total number of responses for that question. In some instances, the total number of responses is provided in addition to or instead of the percentage. For multiple-choice questions, where there was the option to select multiple options, the percentage is based on the total number of selections.

## Power BI Dashboard

All consultation analysis was transferred into Power BI to provide a comprehensive and interactive overview of the results. The dashboard consists of an Overview page, which presents participants' background information, including stakeholder type, region, membership type, age, gender, and chambers.

Each consultation question has a dedicated page in the dashboard, capturing both quantitative (Likert-scale responses) and qualitative (open-ended responses and rationales) data. In total, FSC-STD-40-004 included 42 questions, and FSC-STD-20-011 included 21 questions, all of which are addressed individually in the dashboard.

Each question page includes:

1. A map showing the geographical distribution of responses and the extent of agreement.
2. The total number of responses and the qualitative rationales provided by participants.
3. Interactive charts that are interconnected, allowing users to filter, highlight, and explore data according to their preferences.

The dashboard was designed to ensure that all participants' responses are considered, providing clear insights for stakeholders, including FSC staff and the process working group members, and made available on the following links:

1. [FSC-STD-40-004-V4 D1-0 dashboard](#)
2. [FSC-STD-20-011-V4-4 D1-0 dashboard](#)

## OVERALL PARTICIPATION

This section provides an overview of the consultation participation, with detail for each question provided in the [Responses section](#). 257 participated in the consultation on the first draft. This number includes participants who answered at least one of the consultation questions. In the sections presenting stakeholder response categories and FSC's responses, only categories that oppose the proposed changes or suggest an alternative approach are included; categories expressing agreement are not presented.

## Regional Representation

Responses were received from 44 countries and all regions were represented, with Europe as the region representing the most responses (61%), Germany had the most participants at a country-level (see Figure 1).

Africa was the least represented region with only 1% of responses (3 participants), however this is something encountered previously and is also closely linked to the limited number of certificates and influence FSC currently has in this region.

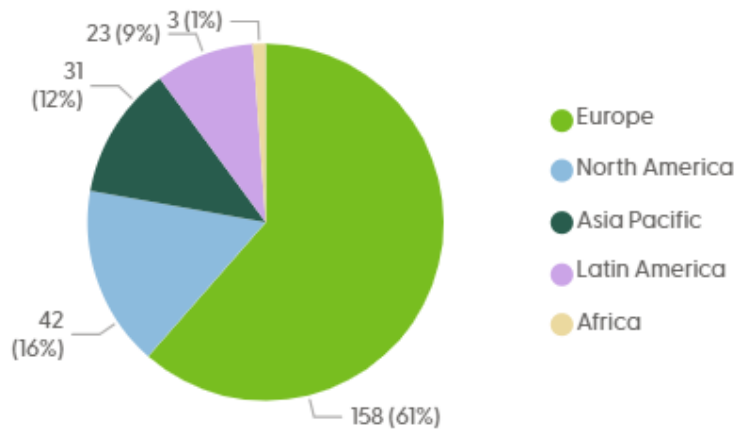


Figure1 Breakdown of participants per region

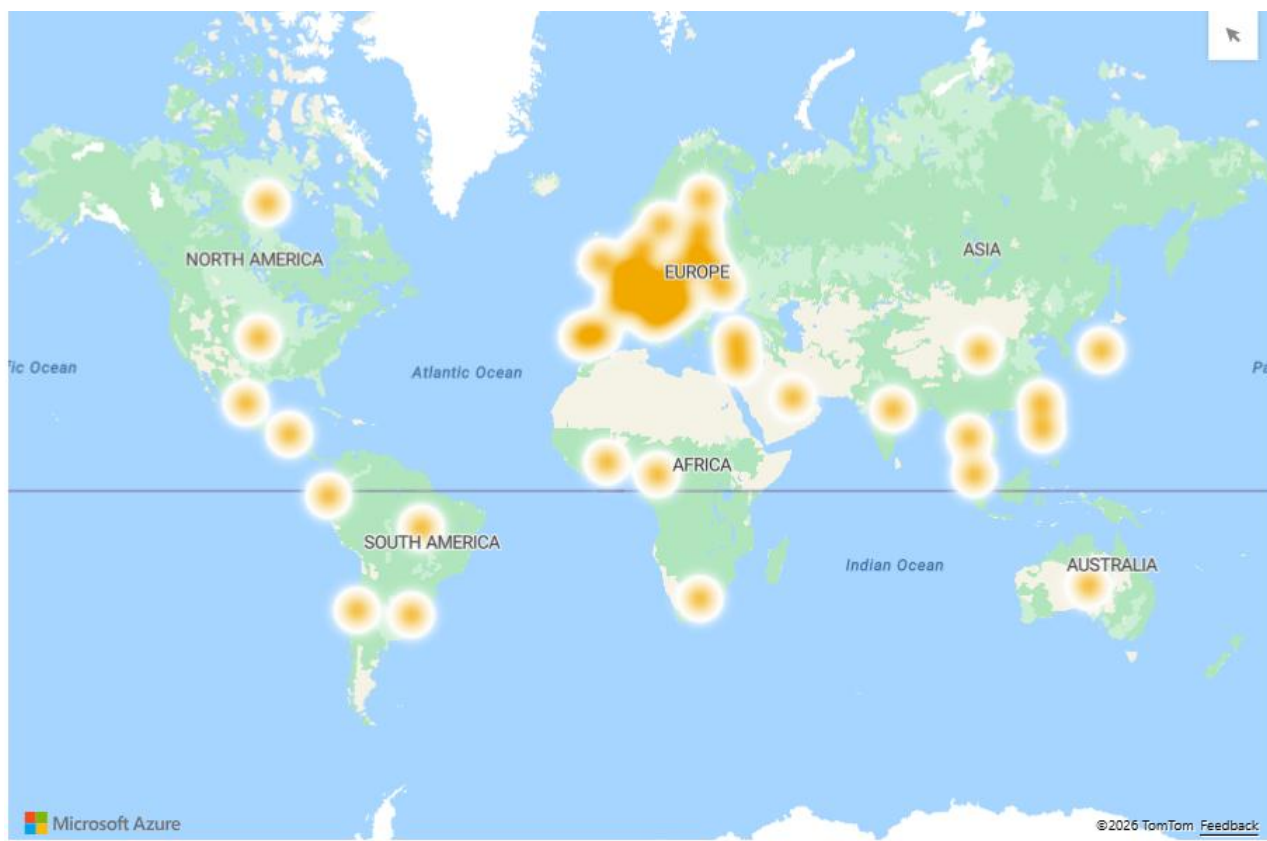


Figure 1 Geographical Distribution of participants

## Stakeholder Type

9 types of stakeholders took part in the consultation, with certificate holders representing the majority (110 participants), followed by Certification body/ASI (40 participants). As some FSC members are also certificate holders, certification bodies, consultants, and other stakeholders, the total number of FSC members shown in Figure 3 is not entirely accurate. Figure 4 provides a more precise representation of

the number of FSC members who participated in this consultation by responding to the question: "If you are an FSC member, please select your chamber."

### FSC Membership Representation

All FSC membership sub-chambers were represented, with Economic North as the most-represented sub-chamber (66%); this occurs mainly due to the number of certificate holders and certification bodies operating in this region. The Environmental South chamber was the least represented, with only 2%. (Figure 4) although there is a slight growth compared to the past consultations.

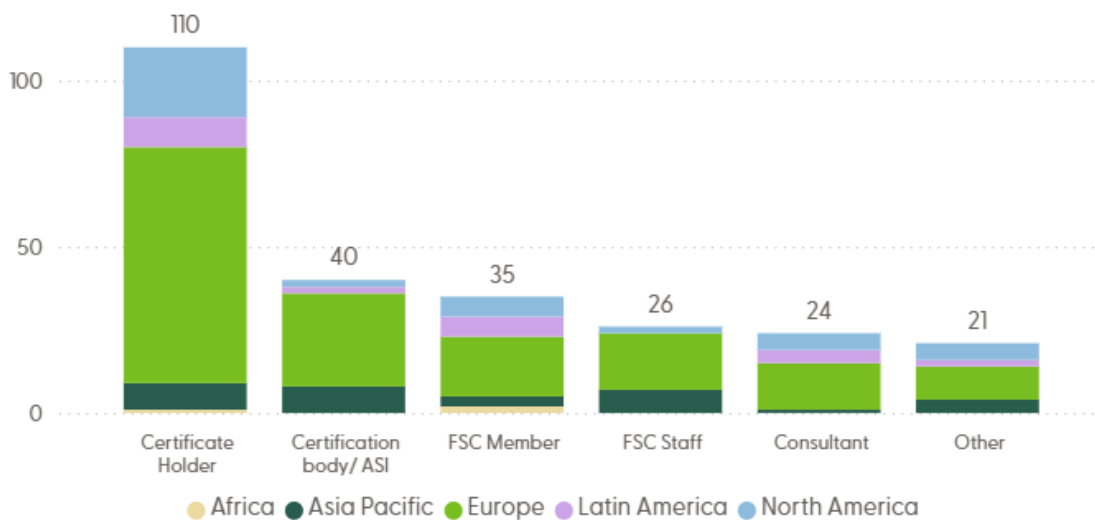


Figure 3 Breakdown of stakeholder type per region

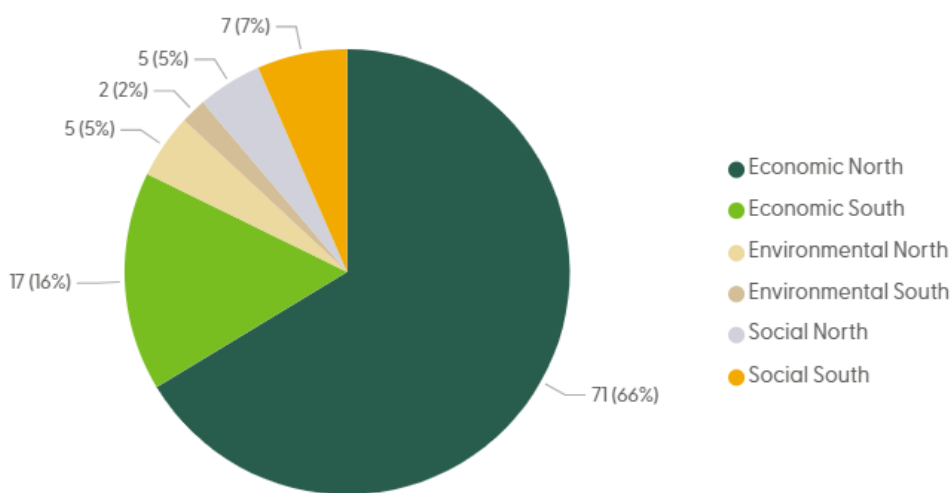


Figure 2 Breakdown of participation by membership chamber

# FSC-STD-40-004 RESPONSES

## 1 Scope

### 1.1 Scope

No.	Question
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1	To what extent do you agree with the changes to the scope section? Please provide the rationale for your answer
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#### Overview of the results

##### Summary of the results:

Overall, stakeholders showed support for the proposed changes to the scope section. Out of 200 respondents, 61% expressed support for the proposal, 29% were neutral, and 10% disagreed.

##### Key Insights:

The results indicate a relatively balanced level of agreement across stakeholder groups, with no clear evidence of conflicting interests. Regional responses also show a similar pattern, with no notable differences in the level of support.

##### Key feedback from participants:

Among those who agreed with the changes, the main themes of their rationales were clear requirements and positive outcomes. In contrast, the group that disagreed focused primarily on the need for clarity regarding the scope and applicability of the requirements.

Feedback	Comments	FSC Response
<b>Clear requirements and positive changes</b>	Responses praising improved clarity, better organization, streamlined content, enhanced readability, or logical structure of the revised scope section	No response
<b>Clarity on the scope and applicability of requirement needed</b>	Responses requesting more specific clarifications, definitions, practical examples, illustrations, or guidance on ambiguous terms or scenarios and stated there is too much info in the scope. It was also proposed that guidance material be either included in the main standard or a separate document.	Scope section is revised to add clarity and remove ambiguous language. Additional examples, illustrations and clarifications will be included in the guidance document.
<b>Annex C should be kept in STD as an informative part</b>	Responses about incorporating Annex C content, concerns about separating informative content into guidance documents, or requests to keep content together	The informative part of Annex C will be included in a guidance document. This way, it can be updated regularly and is not limited to the revision cycle.

<b>Need for Precise Definitions</b>	Responses asked to provide additional definitions for terms like indistinguishable, NTFPs etc.	The distinguishability aspect for mixing wood-based material and NTFPs has been removed to simplify the requirements.
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## 1.2 Mixing NTFP and wood-based products

No.	Question
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2 To what extent do you agree with section 1.2 of Scope “mixing NTFP and wood-based products”? Please provide the rationale for your answer

### Overview of the results

#### Summary of the results:

Among the total of 195 respondents, 48% expressed their support for mixing of NTFP and wood-based products. Additionally, 44% of respondents maintained a neutral stance regarding the proposal, while 8% (equating to 16 respondents) opposed the changes.

#### Key Insights:

In this section, many participants described themselves as having a neutral opinion, significantly more than the neutral responses observed in other questions.

Disagreements were reported only by the Economic North Chamber, while participants from other chambers were either neutral or in agreement.

Among certificate holders, the number of neutral responses was substantially higher than both their agreements and disagreements.

#### Key feedback from participants:

Among those who agreed with the changes, the main themes of their rationales were support for the proposal, improved clarity, better organization, and streamlined content. In contrast, those who disagreed focused primarily on opposing the proposal, noting that certified NTFPs would add an additional burden on certificate holders.

Feedback	Comments	FSC Response
<b>Agree with proposal</b>	Responses praising improved clarity, better organization, streamlined content, enhanced readability, or logical structure of the revised section	No response
<b>Disagree with the proposal, certified NTFPs add burden</b>	Some stakeholders disagreed with requiring NTFPs to be certified as it might add extra burden on certificate holders	The three identified NTFPs (i.e., rattan, bamboo and cork) are a growing market in FSC system and they are in demand. The working group believes sufficient amount of these materials is already certified and that this requirement would therefore

		not impose an additional burden on certificate holders.
<b>Need for clarity of "indistinguishable"</b>	Stakeholders requested clear definition for indistinguishable, as currently it is very subjective	The distinguishability aspect for mixing wood-based material and NTFPs has been removed to simplify the requirements. In D2-0, in any case, when NTFPs and wood-based materials are mixed, the wood-based component shall be certified, and the NTFP (except cork, rattan and bamboo) may be non-certified, provided the label refers to certified component.
<b>Need for examples and guidance</b>	Responses asked for more guidance material either in the standard or separately	Additional examples, illustrations and clarifications will be included in the guidance document.
<b>There are not enough cork, rattan and bamboo globally</b>	Two stakeholders stated that there is not enough certified rattan, cork and bamboo	The working group believes sufficient amount of these materials is already certified and that this requirement would therefore not impose an additional burden on certificate holders.
<b>Remove the exception, all NTFPs should be certified to increase FM growth</b>	Some stakeholders asked for stricter requirements and requested all NTFPs should be certified	Although believing making these three NTFPs mandatory to be certified, admittedly this is not the case for all NTFPs and this could cause huge constrains in supply chains.
<b>All NTFPs should at minimum be controlled</b>	One stakeholder suggested that at least they should be controlled	This is not possible as the FSC Risk Assessments do not cover NTFPs unless it's bamboo or tree derived which follows the same logic in this section.

## 2 CoC management system

### 2.1 Changes in 'Management System' section

#### No. Question

- 3 To what extent do you agree with the changes in this section "Management system"? Please provide the rationale for your answer

#### Overview of results

##### Summary of the results:

Among the total of 191 respondents, 52% expressed their support for changes in the management system. Additionally, 27% of respondents expressed their disagreement regarding changes, while 21% remained neutral opposed the changes.

##### Key Insights:

There is a significant difference in the level of agreement between the Economic North and the other chambers. While the other chambers show strong support for the changes to the management system

(65% agree and 11% disagree), the Economic North holds a largely opposing view, with the majority disagreeing (53% disagree and 29% agree)

**Key feedback from participants:**

Many comments expressed agreement with the changes, highlighting support for improved clarity and better organization. Concerns mainly focused on the need for additional examples and guidance.

Feedback	Comments	FSC Response
<b>Need for examples and guidance</b>	Responses asked for more guidance material either in the standard or separately	Additional examples, illustrations and clarifications will be included in the guidance document.
<b>Agree with changes and groupings</b>	Responses praising improved clarity, better organization, streamlined content, enhanced readability, or logical structure of the revised scope section	No response

**2.2 Restructure of workers’ right-related clauses**

No.	Question
4	To what extent do you agree with the restructuring of workers’ rights-related clauses in Section 1, and the incorporation of the relevant interpretations and advice note? Please provide the rationale for your answer.

**Overview of results**

**Summary of the results:**

A total of 183 stakeholders provided feedback to this question, with 54% agreeing with the restructuring of worker’s right-related clauses in Section 1. 26% of respondents expressed their disagreement regarding changes, while 20% remained neutral opposed the changes (Figure 12).

**Key Insights:**

There is a notable opposing views between stakeholder groups, particularly between Certificate Holders and Certification Bodies. While both groups generally agree with the restructuring of the worker-rights-related clauses, the number of disagreements among Certificate Holders (36%) is significantly higher than that of Certification Bodies (7%).

In this section, the Economic North again shows the highest level of disagreement compared to other chambers. The Economic North reports 49% disagreement and 38% agreement with the changes, whereas the other chambers show stronger support, with 58% agreement and only 17% disagreement.

**Key feedback from participants:**

Among those who agreed with the changes, the main rationale was that the revisions help streamline processes and benefit stakeholders. In contrast, those who disagreed focused on opposing the proposal, suggesting that Section 1 elements related to CLR be included in Section 8 or that all workers’ rights elements be combined.

Feedback	Comments	FSC Response
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<b>Changes support streamlining/ document flow</b>	Comments suggesting the changes help to streamline, by condensing the requirements, incorporating external normative references, and this helps stakeholders.	No response.
<b>Support for CLR in Section 8</b>	Favour to include Section 1 elements related to CLR in Section 8, in order to combine all workers' rights elements.	To address stakeholder calls for one section to include both FSC CLR and health and safety requirements, these have been included in Section 8 D2-0.
<b>Suggestion(s) for improvement/ rewording/ guidance</b>	Suggestions for rewording or additions to specific clauses, and guidance that may benefit stakeholders' understanding.	Requirements related to the implementation of members' motion 51/2021 were amended (see Clause 8.1 e) in D2-0 for more detail). The text 'occupation' has been corrected to 'occupational' (see Clause 8.1 in D2-0), and the reference to 'OHAS' amended to 'OSH', to include a more commonly used term.
<b>Discontent regarding CLR/ drafting process (general)</b>	Comments unsupportive of CLR in general, direction, or the process used to draft proposals, with suggestions including a separate working group specialised on workers' rights as in V3-1.	FSC acknowledges receipt of these comments. The process is meeting the requirements of <u>FSC-PRO-01-001</u> , and includes an auxiliary group focused on workers' rights, including trade union affiliated representation.
<b>Clarification request(s)</b>	Requests for clarification on specific clause(s) or interpretation of the wording.	<p>Queries included terminology used, such as, 'due consideration', 'owners only', 'size and complexity', as well as on whether it applied to contractors.</p> <p>'Due consideration' was a term used in <u>FSC-STD-40-0004 V3-1</u>, and relates to ensuring organizations comply with the law, while also conforming to the FSC CLR. More guidance on this is provided in <u>FSC Core Labour Requirements Implementation Guidance</u>.</p> <p>The 'Owners only' exemption clause has been expanded to highlight that this is applicable where there are no workers, from the relevant interpretation (<u>INT-STD-40-004 68</u>). See Clause 8.2.1 in D2-0 for more information.</p>
<b>Suggestion to move to Annex</b>	Suggestion to move workers' rights elements to an Annex, rather than the main document.	Annexes are typically places to provide more detail on elements referenced within the standard, that can be either normative or non-normative (i.e., informative). The self-assessment is provided as an

		Annex, however as the requirements apply to all organizations, moving workers' requirements to an annex was not considered suitable, however the change to move these requirements into one section is seen as somewhat satisfying this comment.
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## 2.3 Safety requirements

No.	Question
5	Please select the option you prefer. a) Keep the health and safety requirements in Section 1. b) Move the health and safety requirements to Section 8 (FSC core labour requirements)?

### Overview of results

#### Summary of the results:

Out of 178 responses, 60% (106) preferred option B and 40% (71) preferred option A.

#### Key Insights:

While most stakeholders support moving the health and safety requirements to Section 8 (60% in favour of moving versus 40% preferring to keep them), Certification Bodies are the group most inclined to retain these requirements in Section 1 (65% to keep versus 35% to move). Notably, 94% of FM-FM/CoC-CFM certificate holders prefer the move to Section 8, whereas only 63% of CoC certificate holders support it.

#### Key feedback from participants:

The rationales provided by those who supported moving the health and safety requirements to Section 8 were primarily grouped around suitability, practicality, and the benefit of being able to audit them together. Conversely, those who favoured maintaining the separation argued that health and safety is distinct from labour requirements and should therefore remain in Section 1.

Feedback	Comments	FSC Response
<b>Suitability, Practicality, and Fit</b>	Comments that labour requirements and health and safety fit better together and can be audited together	The health and safety requirements have been moved into one section alongside FSC CLR. See Section 8 in D2-0.
<b>One Labour Section</b>	Comments supporting all labour requirements to be in one section/chapter	
<b>Maintenance of separation: OHS vs. CLR</b>	Comments supporting separation, considering that health and safety is distinct from labour requirements, and should remain in Section 1, acknowledging	The separation of the requirements has been maintained, meaning FSC CLR are still separate elements, however now in one section. This acknowledges the difference between health and safety and wider labour requirements. See Section 8 in D2-0.

	their differences and different evaluation needs.	For the consultation on D2-0, Questions 12a) and 12b) are included to explicitly ask stakeholders whether health and safety should be considered as an FSC CLR, with all the requirements this entails e.g., self-assessment, evaluation at the level of the contractor etc.
<b>Consolidation supports streamlining</b>	Comments support combining labour and health and safety requirements as this supports the streamlining of the standard, making it easier for stakeholders, and more coherent.	The requirements have been consolidated into one section, however kept as separate elements. One section is aimed to make it easier for the requirements, such as policy and self-assessment, to be directly connected to the relevant labour requirements rather than in Section 1 and Section 8.
<b>OHAS significance for management</b>	Comments preferring that health and safety remains in Section 1 to signify its importance for management and fit within the management system.	The requirements related to workers' rights and health and safety have been re-located to Section 8 in D2-0, as supported by majority of stakeholders.
<b>Combination brings uncertainty and risks</b>	Comments suggesting combining health and safety and CLR requirements will add confusion, and present difficulties when considering the evaluation of contractors.	Despite the suggested relocation of both requirements into one section (Section 8), any confusion caused in terms of what applies to the organization and the contractor has been clarified in the Section 13 text, which clearly states requirements of FSC CLR with the applicable clause references. See Section 13 of D2-0 for more detail.
<b>Combination with Self-Assessment</b>	Comments suggesting the self-assessment to be included within one section.	The self-assessment detail remains separate to the main normative requirements in Section 8. For the implementation phase, it is planned to provide the self-assessment as a template available for stakeholders to download and use more easily.
<b>Process critique</b>	Comments critiquing the process of the revision.	Concerns on the process are noted, however the process for changing requirements within the chain of custody standards is strictly following the procedural requirements in <u>FSC-PRO-01-001</u> , with FSC CLR requirements not treated differently than other CoC requirements. As this a hybrid process,

		following the regular process, there is no requirement for a working group to be chamber-balanced, however FSC strived to reach balance in terms of gender, stakeholder type, and sub-chamber, where applicable. For more information, including detail on the working group members for Auxiliary 3 'Workers' Rights', see <a href="#">the Process page</a> .
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## 2.4 Other comments

No.	Question
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6 Please provide any other comments you have about the changes related to workers' rights in Section 1.

### Overview of results

#### Key feedback from participants:

Apart from comments on the miscellaneous and general comments on drafting and process, people were asking about applicability and including risk-based approach.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Positive support for proposal</b>	Positive comments on proposals, including suggestions that it helps clarify and streamline.	No response.
<b>Drafting suggestion</b>	Suggested text changes specific to clauses	Requests for the removal of the commitment to the Policy for Association, citing that this was not useful as this is part of the Trademark License Agreement (TLA) and therefore a 'double requirement'. Reference to the Policy remains, however now in Clause 1.1, with direct link to the Trademark License Agreement.
<b>Request for clarification</b>	Questions on applicability, including comments on risk-based approach e.g., for self-assessment in low-risk contexts	Requests to remove the self-assessment requirement for low-risk was addressed, see proposal in Clause 8.2 b) in D2-0.  Requests to clarify the situations where occupational health and safety representation is not elected but rather volunteered and appointed can be elaborated on in the supporting guidance. The related text has been further revised - see Clause 8.1 e) in D2-0.
<b>Concerns on practical auditability</b>	Concerns on how to audit specific elements,	There was noted concern on how to audit the requirement related to Motion 51/2021, providing the right to freely elect representatives. Based on ongoing discussions, this clause has been revised however the

	including the method and resources required.	WG request further feedback on its auditability in the consultation for D2-0 – see Question 14a) and b).
<b>Legal concerns or applicability only where legal provisions do not exist</b>	Concerns on jurisdictions where aspects may be forbidden by law e.g., access to worksites in the US.	FSC notes the concerns regarding potential legal requirements of a country not requiring the election of OSH representatives. The wording has been amended to better address this concern. See proposed Clause 8.1e) in D2-0. However, there is ongoing discussion on how best to address legal concerns specifically related to North American stakeholders.
<b>Terms and definitions</b>	Suggestions to update specific definitions e.g., workers.	The ‘Workers’ definition has been amended, to remove the proposed examples which aimed to clarify, however received comments that they further complicated or confused. Widening the scope of this definition to include those working in waste collection to cover non-forest salvaged wood goes beyond the remit of this revision. A general question is included in the D2-0 consultation (Question 33a) and b)) on the changes to the terms and definitions, which would indicate if there is wide request to amend this definition further, where currently mirrors the definition provided in the forest management requirements since 2012.

### 3 Establishment of the scope of activities

#### 3.1 Establishment of the scope of activities

No.	Question
7	To what extent do you agree with the requirements of this section “Establishment of the scope of activities”? Please provide the rationale for your answer

#### Overview of results

##### Summary of the results:

A total of 176 stakeholders provided feedback to this question, with 61% agreeing with the requirements of the section. 11% of respondents expressed their disagreement regarding changes, while 28% remained neutral opposed the changes.

##### Key Insights:

All stakeholders were consistent on this part, with no signs of conflicting interests. The Economic North is the only chamber showing minor disagreement, while the other chambers reported either full agreement or neutrality

##### Key feedback from participants:

A significant portion of the feedback agreed that the changes improved clarity and strengthened the structure, while those who disagreed requested additional clarification on specific clauses.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
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<b>Changes added clarity and improved structure</b>	Responses praising improved clarity, better organization, streamlined content, enhanced readability, or logical structure of the revised scope section	No response
<b>Remove the species details for characteristic designation</b>	Responses request for removing the requirement to identify species of products that designates the characteristics	The species information is crucial and makes a difference on the quality of some product types. Additionally, based on some investigations, some species have been identified to pose integrity risks to FSC, and therefore, information on those species need to be kept.
<b>CFM claim should not have contribution</b>	Responses indicated that some stakeholders consider CFM as CW and suggest zero claim contribution for these materials	CFM has a higher rigour and is a performance-based standard compared to its previous version which was a risk-based standard. The working group argues there should be differentiation between CFM and CW (certified vs non-certified material, respectively). Claim contribution also helps incentivizing sourcing CFM instead of CW, in line with the <FSC Controlled Wood Strategy>.
<b>Species info should be required for all products</b>	Stakeholders asked for species information for products should be mandatory	This is not possible for every industry and adds huge burden on certificate holders in cases where a product could be potentially made of 100 possible species.
<b>The genus level should be enough; spp. should be acceptable</b>	Stakeholders suggested species name at the level of the genus ('spp.') should be enough, common name should not be requested	The working group decided to keep the 'common name' as it helps certificate holder in cases that scientific name is not well known. The genus level of a species is insufficient to properly identify it, as there may be hundreds of species within a genus, some restricted by relevant legislations, some not. This specificity (genus + species, binominal name) aligns with major wood-trade legislation (namely EUDR, CITES, Lacey Act).
<b>Increase clarity</b>	Stakeholders have requested adding clarity at specific clauses	Changes have been made to applicability boxes (which in D2-0

<b>Applicability Box 1 needs clarification</b>	Some stakeholders found the content of Applicability Box confusing and asked for adding more clarity to it	are named only 'applicability') and box 1. Applicability section is revised to add clarity on what is meant by 'feasible to source'.
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### 3.2 Downgrading scenarios

No.	Question
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8 To what extent do you agree with downgrading scenarios in Figure 1? Please provide the rationale for your answer

#### **Overview of results**

##### **Summary of the results:**

A total of 178 stakeholders provided feedback to this question, with 60% agreeing with the downgrading scenarios. 12% of respondents expressed their disagreement, while 28% remained neutral opposed the changes.

##### **Key Insights:**

Although the overall pattern of responses is broadly similar across stakeholder groups, the level of disagreement varies. Certificate holders show a negligible level of disagreement (2.75%) compared to other groups (19%). In contrast, while consultants generally agree with the changes, their proportion of disagreement (28%) is higher than that of any other stakeholder groups (10%).

##### **Key feedback from participants:**

A significant portion of the feedback agreed that the changes improved clarity and strengthened the structure, while those who disagreed requested additional clarification on some terms.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Agree and Improved Structure</b>	Responses praising improved clarity, better organization, streamlined content, enhanced readability, or logical structure of the revised section	No response
<b>Confusion between FSC Mix 100% and Mix Credit</b>	Stakeholders stated there is confusion between FSC Mix 100% and Credit and CHs are getting NCs for mixing the two. A suggestion is to consider them equal on the downgrading triangle	In D2-0, FSC Mix Credit and FSC Mix 100% have been considered equal in the triangle.
<b>Add clarity on some terms</b>	Suggestion on clarifying reclaimed vs. recycled and FSC Mix 70% and FSC CFM	Definition of reclaimed and recycled is clear, one is a material category and the other is a claim.

		In D2-0 FSC CFM is considered equal to FSC Mix 70%, therefore eligible for labelling.
<b>Clause 2.8 and the pyramids should be integrated</b>	Some responses suggested adding the option of claiming FSC Recycled to FSC Mix in the downgrading triangle	The working group decided to keep the requirement in Clause 2.8 and not integrate in the pyramid, as 2.8 is not a downgrading scenario (neither higher or lower), but rather an option.

### 3.3 Claim FSC Recycled as FSC Mix

No.	Question
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9	To what extent do you agree with providing the option to claim FSC Recycled as FSC Mix? Please provide the rationale for your answer
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#### Overview of results

##### Summary of the results:

A total of 179 stakeholders provided feedback to this question, with 53% agreeing with providing the option to claim FSC Recycled as FSC Mix. 24 % of respondents expressed their disagreement, while 23% remained neutral opposed the changes.

##### Key Insights:

Although most stakeholders show a relatively consistent level of agreement with the changes, Certification Bodies recorded the lowest level of disagreement (4%) compared to other groups (19%). In contrast, Certificate Holders showed the highest level of disagreement, at 32%.

##### Key feedback from participants:

Those who agreed with providing the option to claim FSC Recycled as FSC Mix mainly argued that it would simplify operations for certificate holders (CHs) handling both FSC Recycled and FSC Mix products, reduce administrative costs, and help prevent certificate holders from dropping FSC certification due to operational burdens.

In contrast, those who disagreed expressed concerns that this option could lead to misleading claims and pose risks to the integrity of the FSC system. They also noted that FSC Mix could effectively become 100% recycled, which could blur the original meaning of the claim.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Misleading claims and integrity risk</b>	FSC Mix could become 100% recycled, blurring its meaning, which could mean loss of differentiation between recycled and virgin fibre-based claims. This could result in misleading the consumers,	The option to claim products made exclusively from reclaimed materials as FSC Mix has been existing in the FSC CoC system for nearly a decade (see <a href="#">ADVICE-40-004-17</a> ). This flexibility was carefully introduced to support operational efficiency

	weakening transparency and credibility	<p>for certificate holders, particularly in situations where production process reclaimed and mixed inputs intermittently for labelling. Stakeholders requested FSC to enable this because allowing FSC Mix claim in these cases reduces the need for frequent operational stoppages or repeated changes between FSC Recycled and FSC Mix invoicing and labelling. The definition of FSC Mix is not inconsistent with the option to claim exclusive reclaimed products as FSC Mix, as reclaimed materials are eligible input for the FSC Mix (see definition in D2-0). For example, if a material is made up of 99.9% of reclaimed materials and 0.1% virgin material, this material would be claimed as FSC Mix. It is important to note that FSC Mix product cannot be claimed as FSC Recycled</p> <p>This option does not conflict with the EUDR. Receiving an FSC Mix product does not automatically mean it falls under the EUDR, as the supplier must provide information on the product. Likewise, FSC Recycled products are not always excluded from the EUDR, since pre-consumer wood which is not legally classified as waste is under the scope of EUDR. Applicability is therefore determined by the information and proofs provided by suppliers in line with regulatory requirements.</p> <p>The working group assessed the concerns and concluded that this flexibility does not threaten the system's integrity nor create misleading claims or misalignment with other schemes or regulations. As a result, the clause 2.8 is kept in D2-0. Importantly, this clause does not permit the inverse: Mixed products cannot be claimed as FSC Recycled.</p>
<b>Support for Flexibility: Simplification &amp; Operational Practicality</b>	Simpler operations for CHs dealing with both recycled and virgin products by reducing admin burden and costs by keeping the current practice regulated in the advice note.	
<b>Need for guidance and clarification</b>	<p>Request for clear guidance, examples, and clarification and diagrams.</p> <p>Suggestions for mandatory communication of recycled content to customers or adding certain thresholds for when downgrading is acceptable (e.g., only when avoiding disproportionate costs).</p> <p>Clarify interaction with credit systems and whether recycled mix can downgrade to CW.</p>	
<b>Conflict with other schemes and regulations</b>	Possible misalignment with LEED specifications and ISO 14021. Potential misalignment with EUDR and anti-greenwashing rules.	

## 4 Material Sourcing

No.	Question
10	To what extent do you agree with the changes in the section “Material sourcing”? Please provide the rationale for your answer

## **Overview of results**

### **Summary of the results:**

A total of 176 stakeholders provided feedback to this question, with 73% agreeing with changes in the section “Material sourcing”. 5% of respondents expressed their disagreement, while 23% remained neutral opposed the changes.

### **Key Insights:**

Most participants across all stakeholder groups agreed with the changes. Among the groups, the highest level of disagreement was reported by consultants, at 15%.

### **Key feedback from participants:**

Most comments expressed agreement with the changes, noting that they add clarity. Many respondents praised the improved clarity, better organization, streamlined content, and the more logical structure of the revised section.

<b>Feedback</b>	<b>Comment</b>	<b>FSC Response</b>
<b>Agree with changes and they added clarity</b>	Responses praising improved clarity, better organization, streamlined content, or logical structure of the revised section  The flexibility in 3.3 and 3.4 is welcomed and meets the reality of organizations	No response
<b>Integrity issues for allowing FSC claim in supplementary docs</b>	Some stakeholders expressed agreement in providing the flexibility of adding claim info in sale/ delivery or supplementary documents	As majority of stakeholders agree with this proposal and believe this provides flexibility, working group decided to keep this option.
<b>Needing guidance and examples for streamlined implementation globally</b>	Some stakeholders stated the changes are positive but express the need for guidance to streamline the implementation globally	Additional examples, illustrations and clarifications will be included in the guidance document.
<b>FSC platforms</b>	Responses indicated that some FSC Platforms have issues and don't function properly e.g., FSC Status Watch that sends false alarms	This is raised to FSC's Technology Unit for improvement.

## **5 Material handling**

<b>No.</b>	<b>Question</b>
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<b>11</b>	How feasible is the implementation of the traceability and eligibility requirements for take-back? Please provide the rationale for your answer
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## Overview of results

### Summary of the results:

A total of 174 stakeholders provided feedback to this question, with 45% being neutral about the traceability and eligibility requirements for take back .41% of respondents expressed the feasibility of the requirements, while 14% opposed the feasibility.

### Key Insights:

The largest proportion of participants remained neutral regarding the feasibility of the requirements. There is a consistent pattern across stakeholder groups and chambers on this matter, suggesting a broadly aligned view.

### Key feedback from participants:

Most comments called for additional clarification and guidance, including clearer definitions and explanations, particularly regarding the distinction between recycling, reuse, and take-back.

Below is the key feedback from the participants:

Concern	Comments	FSC Response
<b>Requirements are feasible to implement</b>	Some stakeholders express support, noting that organizations with strong CoC systems, robust quality control, or existing return programs can feasibly implement take back. They argue the requirements are conceptually simple and align with circularity goals	No response.
<b>Questioning the relevance of take-back</b>	Doubt whether the take back concept belongs in the CoC standard and whether it solves a real or significant problem. Calls for removing the requirement entirely.	The conceptual phase process report, studies and engagement by the FSC Circularity Hub, accompanying report, and background analysis paper published collectively provide the rationale for incorporating the take-back concept into the FSC CoC Standard. The introduced requirement addresses take-back and the re-entry of certified materials into certified supply chains, ensuring that traceability and system integrity are maintained. FSC is aware that this will not be applicable to many CHs, but in situations where currently such take-back activity is happening, the absence of any requirements constitutes a gap in the system, posing a risk to integrity.
<b>Request for Clarification and guidance</b>	Stakeholders request clearer definitions and explanation (e.g., transformation, maintenance, initial sale), guidance documents, examples, and differentiation between recycling, reuse, and take back. Minor maintenance of products should be allowed as far as it doesn't change the product,	Additional examples, illustrations and clarifications will be included in the guidance document.  The revised requirements allow some level of maintenance if it does not introduce non-eligible inputs or change the products time.

	or no forest-based product is added.	
<b>Take-back agreement burdensome and unnecessary</b>	The requirement for a formal agreement for take-back of used product is viewed as unrealistic, unnecessary, and burdensome. Many requests for removing it or making it optional.	This requirement has been revised based on stakeholder feedback and the results of the desk test. Industry feedback indicated that establishing individual agreements with all customers is not feasible in practice; however, the intent is commonly addressed through general terms and conditions of sale. The revised requirement adequately captures the original intent of the agreement requirement by ensuring that take-back products can be verified as the originally sold material and that products not meeting the eligibility criteria are excluded.
<b>Traceability, operational complexities and integrity risks</b>	Stakeholders highlight some risks: lack of physical identifiers, difficulty verifying origin, risk of mixing and fraud, batch-level traceability gaps, and challenges with long life or used products.	The requirements have been revised to be feasible for implementation and to mitigate identified risks. Objective evidence of product identification is required and take-back materials which cannot be verified as originating from the certified organization product group or includes non-eligible input cannot be re-sold with an FSC claim. Certification bodies will audit both the implementation of eligibility criteria and the methods used to ensure product identification. FSC will monitor the implementation of the requirement, and address any related issues identified.

## 6 FSC material and products records

No.	Question
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12 To what extent do you agree with the changes in the section “FSC material and products records”? Please provide the rationale for your answer

### Overview of results

#### Summary of the results:

A total of 176 stakeholders provided feedback to this question, with 61% being agree with the changes. 8% of respondents expressed their disagreement, while 31% maintained neutral.

#### Key Insights:

There is clear consistency across the different stakeholder groups, with no specific conflicting interests observed. Once again, the disagreement comes primarily from the Economic North chamber, while no notable disagreement is reported from the other chambers.

#### Key feedback from participants:

Most comments supported the proposed changes, highlighting improved clarity, better organization, streamlined content, and a more logical structure in the revised section.

Below is the key feedback from the participants:

Feedback	Comments	FSC Response
<b>Support the proposed changes</b>	Responses praising improved clarity, better organization, streamlined	No response

	content, or logical structure of the revised section	
<b>Disagree with changes for traders</b>	The flexibility in NOTE 1 under Clause 5.5 should be removed	<p>After careful review of the feedback received, the working group decided to expand this flexibility to all certificate holders regardless of their product or activity type.</p> <p>It is believed to ease the burden of unnecessary admin work without jeopardizing the integrity of the system. D2-0 requires annual summary which can be provided in any unit used by the certificate holder, as long as calculation methodology of the conversion factor can be verified.</p> <p>There is a misunderstanding among some stakeholders on annual summary and the credit/ percentage system accounts.</p> <p>While the former is for overall record keeping of all FSC materials and the actual physical materials traded, the latter is for determining the remaining output product info and the accumulated spendable credits/ %.</p>
<b>The proposal should be limited to finished products</b>	Some stakeholders suggested NOTE 1 under Clause 5.5 should be limited to finished products, as this information is needed for raw or semi-finished material	
<b>The flexibility should be allowed for processors too</b>	Some suggested the flexibility should be provided to manufacturers too	
<b>Having percentage/ credit system and an annual volume summary is double work</b>	A few stakeholders stated that having an annual volume summary and credit/ percentage account is double work	

## 7 Sales

### 7.1 Sales

No.	Question
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**13** To what extent do you agree with the changes in the section “Sales”? Please provide the rationale for your answer

#### Overview of results

##### **Summary of the results:**

A total of 172 stakeholders provided feedback to this question, with 44% agreed with changes in the section “Sales”. 23% of respondents expressed their disagreement to the changes, while 33% remained neutral.

##### **Key Insights:**

There is overall consistency across the stakeholder groups, with no significant conflicting interests observed. Certification Bodies appear largely neutral on this section. As before, all disagreement comes primarily from the Economic North chamber, while no disagreement is reported from the other chambers.

##### **Key feedback from participants:**

The qualitative feedback can be categorized into three main themes. A first group of respondents expressed support for the proposal, noting improved clarity and structure. A second group requested additional clarification regarding the intent of specific clauses. A third group raised concerns about the

restriction on selling Controlled Wood (CW) exclusively to certificate holders (CH), describing it as burdensome and lacking added value.

Below is the key concern from the participants:

Concerns	Comments	FSC Response
<b>Agree with proposals</b>	Responses praising improved clarity, better organization, streamlined content, or logical structure of the revised section	No response
<b>Proposed changes need more clarity on intention of some clauses</b>	Responses showed some stakeholders need more clarity on the intention of some clauses and need more clarity on them	Additional examples, illustrations and clarifications will be included in the guidance document.
<b>Remove restriction of selling CW only to CH</b>	Responses indicated that the restriction of selling CW to only CHs is very burdensome and does not have added value	D2-0 addresses the request from stakeholders and the restriction is removed. In draft D2-0, CW and CFM can be sold as finished products to any organization.
<b>Bring SLIMF info back</b>	A few responses asked to bring back SLIMF information	Based on internal analysis of FSC, this 'add-on' claim has not received much uptake and is removed. The working group decided to keep the same in D2-0.

## 7.2 Requirements for indistinguishable mix of neutral and certified material

No.	Question
14	To what extent do you agree with the changes in the section "Sales"? Please provide the rationale for your answer

### Overview of results

#### Summary of the results:

A total of 162 stakeholders provided feedback on this question. 46% expressed a neutral view regarding the requirements for an indistinguishable mix of neutral and certified material, 31% of respondents agreed with the requirements, while 23% disagreed.

#### Key Insights:

Most stakeholders expressed either a neutral opinion or agreement. However, Certification Bodies are the group most likely to disagree with the requirements, with 41% expressing disagreement.

#### Key feedback from participants:

Comments on this section were mixed. While some respondents agreed with the changes, noting improved clarity and better organization, others indicated that Clause 6.9 lacks clarity in terms of implementation and consistent understanding across stakeholders.

Several comments also expressed disagreement, primarily concerning the concept of neutral material and its integration into the main CoC clauses.

Below is the key feedback from the participants:

Option	Comments	FSC Response
<b>Agree with the proposed changes</b>	Responses praising improved clarity, better organization, streamlined content, or logical structure of the revised section	No response
<b>Clause 6.9 needs clarity on the implementation</b>	A few stakeholders indicated that clause 6.9 is not clear in terms of implementation and equal understanding among all stakeholders	The working group acknowledge the ambiguity of this clause and made changes to add clarity.
<b>Need clarity on the definition of 'indistinguishable'</b>	The term 'indistinguishable' is vague and needs to be defined for clear understanding globally	
<b>Disagree with proposal</b>	Some responses show disagreement of stakeholders mainly on the topic of 'neutral material' and its integration with main clauses of CoC (e.g., scope of neutral material may change, unclear implementation, neutral material is out of scope)	This is a topic that needs to be addressed due to integrity issues that is caused due to consumer misleading and sending an unclear message. However, the Secretariat will publish additional guidance and examples to clarify and streamline the implementation globally.

## 8 FSC core labour requirements

### 8.1 Changes in FSC core labour requirements

No.	Question
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15	To what extent do you agree with the proposed key changes in Section 8 "FSC core labour requirements"? Please provide the rationale for your answer
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#### Overview of results

##### Summary of the results:

A total of 172 stakeholders provided feedback on this question. Of these, 54% expressed their agreement with the proposed key changes FSC core labour requirements. Meanwhile, 16% of respondents disagreed with the requirements, while 30% remained neutral (Figure).

##### Key Insights:

Most stakeholders expressed their agreement. However, Certification Bodies are the group that showing the most neutral opinion on the topic.

##### Key feedback from participants:

Comments in this section can be grouped into three main categories. The majority were supportive of the proposal, highlighting the changes, alignment, and simplification. Another group suggested revisions to the drafting, including correcting typos and recommending additions or deletions. The third category raised concerns regarding the concept of CLR and the newer changes.

Below is the key feedback from the participants:

Feedback	Comments	FSC Response
<b>Positive support for proposal</b>	Support for changes, with comments on improvement, alignment, and simplification.	No response.
<b>Request for Clarification</b>	Questions on the changes.	Questions on elements of freedom of association, such as Union Shop Systems, application of requirements where rights are limited or not permitted, and on collective bargaining agreements, will be addressed in the guidance materials. Where not currently provided in the supporting guidance for FSC CLR, guidance will be updated to reflect stakeholder comments received, and include some practical examples.
<b>Unclear/Unsatisfactory Change(s)</b>	Comments that are concerned about the concept of CLR or the newer changes.	<p>Some comments suggested some stakeholders considered changes to child labour were new and did not support the reference to work for 13-15 year olds. However, the requirements have not changed from V3-1. These have only been re-formatted and are aligned with other schemes and the ILO requirements, which allow for under fifteen year-olds to do 'light work' (see ILO Convention No. 138, Article 7) .</p> <p>Other comments suggested that the inclusion of FSC CLR in V3-1 did not present a 'major challenge' to stakeholders, as described in the consultation material, and that no changes in FSC CLR should be made without a dedicated working group. Based on stakeholder comments since its implementation, this was considered challenging for many stakeholders. Additionally, the Procedure that guides this revision permits the revision of all requirements within the Chain of Custody standards, including the FSC CLR. Inclusion of a dedicated auxiliary group focussing on workers' rights helps to ensure this topic is covered with technical expertise and consideration for practical implementation of any proposed changes.</p>
<b>Drafting suggestions</b>	Suggested changes to the drafting, including typos, recommended additions or deletions.	Some comments noted dissatisfaction on the wording linked to Motion 50/2021 in Section 8, Clause 8.5.2, including that this text was not base on the agreed motion, with others suggesting room for clearer formulation. Therefore, this has been reformulated, with closer reference to the Motion, including a change from 'workplace' to 'workers'. Other drafting errors with references in Section 8 have been updated.
<b>Request for more risk-based approach/change(s)</b>	Request for more-risk based approaches, taking in consideration different approaches based on risk, and clarification on the	Stakeholders requested countries with low risk to have the FSC CLR removed or lessened, including the requirement related to provision of the self-assessment. This request for an enhanced risk-based approach has been addressed in the changes related to the evaluation requirements (FSC-STD-20-011). Within the certification requirements, the requirement for the self-assessment information has been limited to focus on FSC CLR of 'high risk' based on the FSC CLR Risk Matrix, which has been

	working of the FSC CLR Matrix.	updated. This results in countries with low risk to have a reduced administration burden, and limited evaluation.
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## 8.2 Prison labour

No.	Question
16	<p>Select the option you prefer:</p> <p>a) inclusion of the suggested Clause 8.3.3 permitting prison labour with conditions; this provides for permission within the scope of Article 2 of ILO Convention No.29.</p> <p>b) absolute exclusion of any form prison labour, with a Clause providing “The Organization shall not use any form of prison labour for any activities under the scope of an FSC CoC certification” or similar..”</p> <p>Neither a) nor b)</p>
17	Please provide detail on any other changes you would like to see in Section 8 (FSC core labour requirements),and include your rationale.

### Overview of results

#### Summary of the results:

A total of 146 stakeholders provided feedback on this question. Of these, 56% expressed their agreement with inclusion of the suggested permitting prison labour with conditions. Meanwhile, 21% of respondents agreed with the absolute exclusion of any form of prison labour, while 23% remained neutral (Figure).

#### Key Insights:

There is a consistent level of agreement across stakeholder groups on this section, with most supporting the inclusion of permitting prison labour under specific conditions.

From a chamber perspective, however, opposition favouring the exclusion of any form of prison labour comes primarily from the Environmental and Social chambers.

#### Key feedback from participants:

Comments in this section can be divided into two main groups. One group supported the inclusion of prison labour and viewed the changes positively. The other group raised concerns, citing risks, practical challenges, and references to past incidents reported in the media.

Below is the key feedback from the participants:

Concerns	Comments	FSC Response
<b>Supports benefits including rehabilitation aspects</b>	Supports providing option to allow prison labour, due to the rehabilitative aspects it brings, including better re-integration in society.	No response
<b>No support due to risks, practicalities/and past issues</b>	"Not supportive of the option to allow prison labour, due to inherent risks, past news stories, and consideration that FSC should strive to set strict limits to ensure credibility.	Comments stressed concern that some countries have involuntary prison labour, and how the practicalities of including it do not outweigh the risks, with it being very difficult to gauge 'voluntariness' or 'approximate' if prison work conditions. Furthermore, others suggested FSC 'should not promote or facilitate it'. To

		address this and not unintentionally promote prison labour or use of it, direct reference has been removed. More clarity on any use, as with the current requirements, will be updated in the guidance materials for the implementation phase.
<b>Drafting suggestion(s)</b>	Suggestions on improvements to the draft, including identified typos.	Comments suggested to better stress that conditions are equivalent to non-prison labour, however did not provide suggestions. Based on the objections from stakeholders, the working group agreed to remove reference to prison labour, and instead provide any guidance on how it could be used by certification bodies, in line with the ILO requirements, in the guidance for the implementation phase.
<b>Relevance concerns</b>	Concern on how relevant this change would be, with suggestion that no reference to prison labour would be more acceptable.	Comments suggested that inclusion further complicates the system, and that in itself, use of prison labour is often too complicated for organizations to use, and therefore impacts only a small number. These comments were considered by the working group, who agreed to remove reference.
<b>Legal/jurisdictional concerns on application</b>	Concern over mentioning of prison labour, as this is dependent on the legal context, and this change may limit ability for stakeholders to use prison labour if formally prohibited.	Comments included that the original CLR were carefully considered and did not include explicit reference to 'prison labour', with others considering that the inclusion is 'unnecessary' as this is always dependent on permission to use based on the legal framework of the country. These comments were considered by the working group, who agreed to remove reference.

### Key feedback from participants on Question 17:

#### Overview of results

The main feedback on this section focused on requests for greater clarity on specific clauses and their practical application, as well as suggestions to provide supporting guidance materials alongside the draft.

Concerns	Comments	FSC Response
<b>Support for consolidated CLR section</b>	Comment to include all labour rights requirements in one section (Section 8)	The second draft includes the FSC CLR in one section (Section 8) to address calls to 'make the standard clearer...and maintain coherence'.
<b>Support for more scheme recognition (e.g., ISO45011) for CLR conformance</b>	Comment on allowing more schemes to be recognised and provided as evidence to demonstrate conformity to FSC CLR, including e.g. ISO 45011, SEDEX, CDP, Sustainalytics etc.	With the aim to provide a more risk-based approach, the ability to reduce the evaluation intensity for organizations has been revised in D2-0 where other audits may be used to 'lower' the risk classification.

<p><b>Request for more risk-based approach/change(s)</b></p>	<p>Comment to include more risk-based approaches including e.g., considering removing/exempting requirements such as self-assessment for low-risk organizations.</p>	<p>Changes to chain of custody, to take a similar approach to forest management, in relation to creating national-based requirements similar to Forest Stewardship Standards are not foreseen, with all requirements maintaining universal application. However, a more risk-based approach is proposed, with changes in second drafts, for both certification and evaluation requirements. This includes the introduction of a consistent starting point for stakeholders, with application of the FSC CLR Risk Matrix aiming to ensure resources are focused more on areas of risk, thus addressing potential audit cost and time concerns. See Sections 8 and 13 of FSC-STD-40-004 V4-0 D2-0 and Sections 12 and 14 of FSC-STD-20-011 V4-3 D2-0 for more detail.</p>
<p><b>Drafting suggestion(s)</b></p>	<p>Comments suggesting improvements and corrections to the draft text, including typos.</p>	<p>Changes were made to the formatting and misprints related to clause references within Section 8. Certain terms such as ‘forced labour’ were requested to be further defined, however these are already defined based on the ILO Conventions, and therefore further clarification within the standard was not considered necessary.</p>
<p><b>Request for clarification including guidance</b></p>	<p>Comments requesting more clarification on specific clauses and their practical application, as well as suggestions for useful guidance materials to accompany draft.</p>	<p>Guidance on FSC CLR and its evaluation is part of the implementation of the revised motion, with all current documents to be updated according to the final agreed requirements.</p> <p>Some comments suggested less familiarity with the member motions referenced. These are available to FSC Members only on the <a href="#">FSC Members’ portal</a>, with the following Motions referenced in the previous consultation documents:</p> <ol style="list-style-type: none"> <li>1. <a href="#">Motion 50/2021</a>: Policy Motion on the right of access to workers</li> <li>2. <a href="#">Motion 51/2021</a>: Policy Motion on the right of workers to elect their Occupational Health and safety representative(s)</li> </ol>
<p><b>Criticism (complexity, scope, and practicality)</b></p>	<p>Comments criticising proposed changes, including suggestions that more CLR changes are adding complexity, extending the scope, and</p>	<p>General discontent on CLR taking focus from other CoC topics, specific discontent on content on freedom of association requirements, with uncertainty on judgement of ‘good faith’, and concern regarding the implementation of Motion 50/2021. The term ‘Good faith’ is provided in the Terms and Definitions, with further elaboration in</p>

	are not practical to implement/audit.	FSC guidance on documents, which will be updated as part of the implementation of revised standard. Concerns related to Member motion 50/2021 are addressed above – see responses for Question 15.
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## 9 Transfer system

No.	Question
18	To what extent do you agree with changes in Table 3 – output claims under transfer system? Please provide the rationale for your answer

### Overview of results

#### Summary of the results:

A total of 153 stakeholders provided feedback on this question. Of these, 42% expressed their agreement with the output claims under transfer system. Meanwhile, 17% of respondents disagreed with the requirements, while 41% remained neutral.

#### Key Insights:

There is a consistent level of agreement across stakeholder groups on this section. However, Certificate Holders demonstrated a higher proportion of neutral responses compared to other groups.

#### Key feedback from participants:

Comments in this section can be divided into three main groups. One group supported the proposed changes, highlighting improved clarity and organization. Another group requested additional guidance and clarification on the implementation of different mixing scenarios, particularly with the inclusion of the FSC CFM 70% claim contribution. The third group raised concerns about potential integrity risks for FSC associated with the 70% claim contribution.

Below is the key feedback from the participants:

Concerns	Comments	FSC Response
<b>Agreed with proposal, changes are positive</b>	Responses praising improved clarity, better organization, streamlined content, or logical structure of the revised section	No response
<b>More guidance/ clarification is needed</b>	Some responses show concern on unclarity on implementation of different mixing scenarios with inclusion of FSC CFM with 70% claim contribution	In D2-0, 2 examples are added to add clarity on how mixing FSC CFM with other claims would work. Additional examples, illustrations and clarifications will be included in the guidance document.
<b>CFM should not be considered certified/ have claim contribution</b>	Some concerns on integrity issues for FSC in case of 70% claim contribution for CFM	FSC CFM materials are considered certified based on the standard FSC-STD-30-010 V3-0.  The working group believes CFM has much higher and stricter requirements compared to CW,

		therefore they should not be considered equivalent.
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## 10 Credit and percentage System

No.	Question
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19	To what extent do you agree with the changes to credit and percentage systems for multi-site certification? Please provide the rationale for your answer
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### Overview of results

#### Summary of the results:

A total of 170 stakeholders provided feedback on this question. Of these, 60% expressed their agreement with the changes in Credit and percentage system. Meanwhile, 15% of respondents disagreed with the changes, while 25% remained neutral.

#### Key Insights:

There is a consistent level of agreement across stakeholder groups on this section.

#### Key feedback from participants:

The majority of comments supported the changes, providing positive feedback on allowing cross-site and cross-border credit and percentage sharing. Respondents noted that the removal of the Eurozone limitation improves consistency and fairness.

In contrast, those who disagreed raised concerns about potential integrity risks and highlighted a lack of clarity in the definition of “high integrity risk,” as well as the absence of a publicly accessible risk list.

Below is the key feedback from participants:

Concerns	Comments	FSC Response
<b>Support the proposed change</b>	Positive feedback on allowing cross-site and cross-border credit and percentage sharing, removal of Eurozone limitation improves consistency and fairness which increases operational flexibility without physical material transfer. This increases the potential of uptake of FSC certification	No response
<b>Unclear on geographic area</b>	Definition of “geographic area” is unclear; Lack of criteria for defining geographic boundaries  Uncertainty whether transfers are allowed within or between geographic areas	The restriction is only applied to the sites that are identified as “high risk”. The current formulation of the clauses may cause misunderstandings. In D2-0 the working group revised Clauses 10.4 c) and 11.3 c).

	Need for clarification on risk mitigation when credits or percentages are shared across different regions	
<b>Unclear on the rationale of the rolling 12-month period for credit system</b>	Some stakeholders stated the purpose of introducing a rolling 12-month period in Clause 11.3.c) is unclear and there is misalignment between the 24-month credit account and the 12-month period for sites. Comments indicated that this increases administrative complexity compared to a fixed period and suggested for alignment or coexistence of fixed and rolling periods; removing the 24-month period for low integrity risk areas.	<p>The purpose of introducing a rolling 12-month period is to ensure that materials are utilized at the site level.</p> <p>There are cases in the market where the site has not been up for 24 months, yet it may still be included in the credit account. The 12-month rule offers flexibility to include a site in a credit account.</p> <p>Additionally, a 12-month period aligns with the central office's annual audit cycle in the multi-site certification setup and with the central office's management model.</p> <p>The working group decided to keep the 12-month rule for this Clause and the 24-month rule for general credit account administration.</p>
<b>Integrity risk topic</b>	<p><b>Problems:</b></p> <ul style="list-style-type: none"> <li>• Unclear in the definition of “high integrity risk”, who classifies and evaluates risks, at the country, sub-national, activity, supply chain, or country level.</li> <li>• Absence of publicly accessible risk lists.</li> <li>• Aggregation across sites may reduce site-level transparency; Potential masking of weaker controls at individual sites; Higher risk of incorrect claims under credit systems; risk of credibility and integrity under percentage calculation</li> <li>• Increased complexity for audits and volume; inconsistent understanding of risks</li> </ul> <p><b>Suggestions:</b></p> <ul style="list-style-type: none"> <li>• Applying the approach in Annex 4 (FSC-STD-40-004 D1-0) for risk classification</li> <li>• Need for strong safeguards and monitoring mechanisms, and for appeal, review, and transition</li> </ul>	Working group members collaborated with FSC to identify and provide suggestions for the implementation of FSC's integrity risk.

	<p>mechanisms with a clear updating timeline (e.g., twice per year); Suggestion for clear criteria, including qualified human resources</p> <ul style="list-style-type: none"> <li>• developing guidance to ensure consistent application</li> </ul>	
<p><b>Suggest reconsidering the minimum percentage of FSC materials within each site.</b></p>	<p>Stakeholders mentioned the rationale for minimum thresholds is unclear and there is inconsistency between percentage system (50%) and credit system (10%)</p> <p>This reduces flexibility and causes stranded credits, potential inefficiencies and increased transport impacts. Comments asked for lower, aligned, or removed thresholds</p>	<p>Working group acknowledges the concerns; however, there is no clear market information on the consequences of making such changes.</p> <p>For the credit system, each site is required to contribute to an overall credit account, while the percentage system reflects the proportion of FSC-eligible input in the product group. This differentiation between the two control systems requires a different threshold setup for each participating site: 50% for the percentage system and 10% for the credit system.</p> <p>Meanwhile, certificate holders are already having the setup at the current threshold. The working group disagreed with changing the requirements without a clear overview of market impacts. Moving forward, while the requirements are not changed at this time, FSC captures the concerns and will conduct further research to identify opportunities to lower the threshold for the credit and percentage system.</p>

## 11 Outsourcing & provision of services

### 11.1 Changes in Outsourcing and provision of services

No.	Question
20	To what extent do you agree with the changes in the section “Outsourcing & provision of services”? Please provide the rationale for your answer

#### Overview of results

##### Summary of the results:

A total of 171 stakeholders provided feedback on this question. Of these, 51% expressed their agreement with the changes in Outsourcing and provision of services section. Meanwhile, 30% of respondents disagreed with the changes, while 19% remained neutral (Figure).

##### Key Insights:

This section was more controversial among stakeholders, Certificate holders tended to express more disagreement with the proposed changes, whereas the other stakeholder groups were generally more supportive.

Once again, the Economic North chamber recorded the highest level of disagreement, whereas the other chambers generally showed agreement with the changes.

**Key feedback from participants:**

The main comments in this section can be grouped into two categories. Those who agreed with the proposal highlighted improvements in clarity, organization, and the logical structure of the revised section. In contrast, participants who disagreed raised concerns about the exclusion of CLR from contractors or its proportional application to activities.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>agree with proposals and the changes are positive</b>	Responses praising improved clarity, better organization, streamlined content, or logical structure of the revised section	No response
<b>suggestion to add clarity or improvements</b>	Some responses requests for adding clarity on some clauses that are considered vague	D2-0 is revised to add clarity. The scope of activities is clearly defined based on the feedback received from the stakeholders. Some minor teaks made on the clauses to remove ambiguity.
<b>proposing changes to the scope of contractors/ requirements</b>	Some responses propose some changes in the requirements to improve them	
<b>CLR should not be applicable to contractors (or at least proportionately)</b>	Some stakeholders indicated that CLR should be out of scope of contractors or proportionately to the activity	Contractor topic was discussed extensively and it was decided to limit the applicability of FSC CLR to the organization, discussions since 2021 lead to the inclusion, with the changes in this revision as consequence. The rationale for inclusion ensures the FSC CLR is upheld for workers in direct supply chains providing activities for the certification holder. Descriptive argumentation on why contractors should be excluded in V3-1 were not provided nor included in the comments in this consultation.  CLR is a key component of CoC certification and same as other requirements, is applicable to contractors as well. However, FSC has adopted a more risk-based approach in this topic.

<b>Disagree with further outsourcing for any activity</b>	Stakeholders indicated that further outsourcing should not be allowed at all, due to high integrity risks	Working group believes that further outsourcing is aligned with the reality of the organizations and under strict regulation, it is beneficial and does not add integrity risks.
<b>Disassociated/ blocked companies should be allowed to be contracted</b>	Some responses indicated that restriction of outsourcing activities to blocked and disassociated organizations could have potential negative implications	As part of keeping the credibility of FSC, FSC activities should not be associated with unacceptable activities or disassociated organizations.

## 11.2 Defined activities for outsourcing

No.	Question
21	To what extent do you agree with the defined activities (Clause 13.1.1) for outsourcing? Please provide the rationale for your answer
22	Do you think any activity should be added/ removed to/from the scope of outsourcing activities? Please provide the rationale for your answer

### Overview of results

#### Summary of the results:

A total of 162 stakeholders provided feedback on activities for outsourcing. Of these, 63% agreed with the definition, while 19% expressed disagreement and 19% remained neutral.

#### Key Insights:

There is a consistent level of agreement across stakeholder groups on this section. However, FSC members showed a higher level of disagreement (33%) compared to other stakeholders (16%), making them the primary source of dissent.

#### Key feedback from participants:

The main comments in this section can be grouped into two categories. Those who agreed with the proposal highlighted improvements in clarity and the organization of the revised section. In contrast, other participants raised concerns about the inclusion of harvesting and logging in the standard, as these are typically covered under FM certification.

Below is the key feedback from participants:

Concerns	Comments	FSC Response
<b>Scope of outsourcing activities are clearly defined and make sense</b>	Responses praising improved clarity, better organization, streamlined content	No response
<b>Harvesting and logging belong</b>	Some responses indicated that stakeholders were concerned and confusion by inclusion	Harvesting and logging can be part of CoC, if the CoC certificate holder

<b>to FM certification</b>	of harvesting and logging in this standard as they are normally covered under FM certification	buys standing tree and hires a contractor to do the logging. Therefore, no duplication.
<b>Suggest adding more activities</b>	Some activities were suggested to be added to the scope of activities that can be outsourced (e.g., packaging, repackaging)	The working group considers the revised activities cover the scope of outsourcing.
<b>List of activities should be non-exhaustive</b>	Some responses suggested the list of activities should not be fixed	The working group believes in order to have better control on outsourcing activities, they should be defined.
<b>Purchasing and selling is confusing in outsourcing activities</b>	some responses show stakeholders' concern on adding "selling" and "purchasing" to outsourcing activities as it might imply they can have legal ownership	D2-0 removed 'purchasing' and 'selling' as deemed confusing by stakeholders.

#### 11.4 Clause 13.2.4

No.	Question
23	Do you consider Clause 13.2.4 clear and easy to understand? Please provide the rationale for your answer
24	Please provide any other comment(s) on the changes related to workers' rights in Section 13.

#### Overview of results

##### Summary of the results:

A total of 128 stakeholders provided feedback on clarity of the Clause 13.2.4, Of these, 51% selected "No," 42% selected "Yes," and 7% preferred not to answer.

##### Key Insights:

There is a lack of consistency among stakeholder groups on this section. While the majority of certificate holders found it clear and understandable, other stakeholder groups believe clause 13.2.4 is not yet clear and understandable.

##### Key feedback from participants:

The main comments in this section can be grouped into two categories. One group requested additional clarification on the applicability of Clause 13.2.4 and the treatment of non-FSC-certified contractors. The other group offered suggestions for improving or modifying the proposed clauses and requirements.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Clear and understandable</b>	Supports proposed Clause 13.2.4 and considers the clause understandable and clear.	No response.

<p><b>Request for clarification, including guidance</b></p>	<p>Requests more clarification on the applicability of the Clause 13.2.4 and treatment of non-FSC-certified contractors.</p>	<p>Comments included request for clarification on the FSC CLR Matrix and how this fits with defining the risk level of the contractor's outsourcing agreement in respect of FSC CLR. Other comments requested elaboration of the meaning of this requirement, and whether if the contractor had addressed a nonconformity, if this could result in a 'low risk' classification, and whether any audit had to be 'on-site', and whether this is a 'may' or 'shall' requirement.</p> <p>This remains a 'may' requirement in Clause 13.9 of D2-0, with the Note 1 explaining that this is not mandatory but it can be made use of. Where the information is not made available for use by the CB, the usual risk assessment in Section 12 of FSC-STD-20-011 would apply.</p>
<p><b>Suggestions for change(s)/improvement(s)</b></p>	<p>Comments providing suggestions on how to improve or change the current proposed clauses and requirements for contractors.</p>	<p>Comments suggested enhancement of the Clause 13.2.4 Note to clarify that this is not an obligation and 'not mandatory' for organizations to conduct audits of their contractors. This has been included in D2-0 (see Clause 13.9 Note 1).</p> <p>Other comments requested the removal of the requirement to interview workers (Clause 13.2.4d)), questioning its legality. This requirement is the inclusion of the <u>ADVICE-40-004-23 V2-0</u>, which included worker interviews as a condition of permitting 'first-/second-/third-party' audits to be used by the certification body to determine the risk classification for the uncertified outsourcer as 'low'. Worker interviews are considered an indicator that indeed the contractor upholds FSC CLR, and therefore this is maintained in D2-0.</p> <p>Furthermore, several commented to remove the requirement for 'annual' (Clause 13.2.4b)), especially for those who may not be producing. As requirements to uphold the FSC CLR apply regardless of activity, provided there are workers, this requirement is maintained and continues to be applicable, only where the certified organization wishes to provide documentation to aid the CB to make its risk classification, as explained above.</p>

<b>Credibility concerns</b>	Concerns on whether first-/second-/third-party audits offer sufficient robustness.	Comment suggested specifically the removal of the first-party audit, questioning its robustness to ensure integrity. After working group discussion, the 'first-party audit' element has been removed. See Clause 13.10 in D2-0 for more information.
<b>Adds complexity</b>	Comments suggest the changes are adding complexity and audit burden.	Comments suggested this requirement is counter to streamlining and disproportionate, adding more workload for organizations and, instead, requests a more risk-based approach. These comments have been considered, with a changes to create an enhanced risk-based approach in D2-0, which strives to reduce audit burden for those in low-risk contexts. It should be noted that this clause does not mean all organizations have to have another audit – please see above comments.

## Key feedback from participants for Question 24:

### Overview of results

The main comments on this question focused on the challenges posed by the proposals, particularly the increased administrative burden for certificate holders and the additional evaluation workload for certification bodies.

<b>Feedback</b>	<b>Comments</b>	<b>FSC Response</b>
<b>Request for clarification, including guidance</b>	Request for clarification on specific clauses related to outsourcing, including suggestions for guidance that could accompany the normative requirements.	<p>Some comments questioned the meaning of certain terms, such as 'FSC-approved verification scheme'. This term is defined however there was a spelling error noticed – missing hyphen – so this has been corrected in D2-0 in the Terms and Definitions.</p> <p>Other comments on how guidance for certification bodies is essential for the successful application.</p> <p>Furthermore, some requests for outsourcing agreements and if they apply where there is no risk of mixing for storage/logistic activities. FSC CLR and risk or mixing is considered as two separate risk scenarios, however, for storage and logistic sites, in D2-0 there is the exemption from the outsourcing agreement and its requirements for those with 'finished and labelled' or products 'marked' in a way that cannot be altered. If the storage and logistic activity contractor does not fit this exemption, the FSC CLR would still apply.</p>
<b>Suggestions for change(s)/improvement(s)</b>	Suggested improvement to the outsourcing requirements	There was request for additional clarity on what Clause 13.2.3 requires, and what would be satisfactory to achieve meeting this requirement. Since the requirements implementation from 2023, the

		understanding of this requirement is considered clear for the majority, however, this comment will be noted for the updated guidance materials, as part of the implementation of the revised standard.
<b>CLR requirements only for certificate holders</b>	Comment that CLR should not be applicable to non-certified companies.	The inclusion of CLR for activities outsourced is to ensure that the workers for companies providing activities for the certified organization in the scope of the certification are also protected. The approach for chain of custody mirrors that of forest management, which includes workers of the contractor in scope.
<b>Challenge(s) with proposals</b>	Comment on administrative burden for certificate holders and evaluation burden of checking requirements for certification bodies.	Comments consider requirements for outsourcing create more administrative burden for the certificate holder, added complexity, and is considered 'problematic for many organizations', including suggestions that a written commitment should be considered as 'sufficient' and the self-assessment requirements for all means 'excessive' documentation in 'low risk' contexts and instead asks for pragmatism. Such comments have been addressed, with enhancements to the risk-based approach. See comments on Question 17 for more detail.
<b>OHS inclusion for contractors</b>	Suggestion that outsourcing requirements should also include checks on occupational safety and health elements, if included in CLR.	Based on mixed feedback on whether OSH should be considered as FSC CLR and concerns around how checks on safety could be adequately covered for contractors, without adding more complexity to the system, OSH remains as an organizational requirement.  A question is included in the consultation on D2-0, to better assess the stakeholder support for any change. See comments on Question 5 for more detail.

## 11.5 Feasibility of the implication of the traceability and eligibility requirements

No.	Question
25	How feasible is the implementation of the traceability and eligibility requirements? Please provide the rationale for your answer

### Overview of results

#### Summary of the results:

A total of 106 stakeholders provided feedback on feasibility of the traceability and eligibility requirements, of these, 35% found it feasible," 15% found it not feasible," and 50% remained neutral.

#### Key Insights:

There is a lack of consistency among stakeholder groups on this section. Excluding those who were neutral, Certificate Holders and Consultants generally considered the proposals more feasible than not, while Certification Bodies mostly found them not feasible. All 'not feasible' feedback came from the Economic chamber, whereas the other chambers were either neutral or viewed the proposals as feasible.

### Key feedback from participants:

The main comments in this section can be grouped into two categories. One group requested additional clarification and guidance emphasizing the need for product category specific guidance defining minimum traceability requirements. The other group stating that implementation is manageable and even beneficial for strengthening the FSC system.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Requirements feasible to implement</b>	Implementation is manageable and even beneficial for strengthening the FSC system. Some stakeholders note that product identification through permanent labels is straightforward and that modern traceability solutions make such requirements achievable. Respondents also suggest that, with adequate internal controls and process adaptations, organizations can meet the requirements	No response
<b>Request for clarification and guidance</b>	Stakeholders request clearer explanations and emphasize the need for product category specific guidance defining minimum traceability requirements, clearer boundaries for leasing and sector applicability, and overall improved clarity to avoid misinterpretation.	Additional examples, illustrations and clarifications will be included in the guidance document.
<b>Traceability, operational complexity and integrity risks</b>	Stakeholders highlighted concerns about how traceability will work in practical scenarios, particularly for leasing or services where product handling differs from traditional CoC models. Stakeholders stress the need for tailored guidelines to address varying product types and operational realities, warning that without this, organizations may struggle with inconsistent verification of eligibility and maintaining integrity.	Through an industry desk test, companies confirmed the feasibility of the traceability requirements and requested for further refinement to enhance implementation. The requirements have been revised and structured to mitigate identified risks. Objective evidence of product identification is required, and certification bodies will verify both the implementation of eligibility criteria and the methods used to ensure product traceability.

### 11.6 Establishment of leasing agreement

No.	Question
26	How feasible is it to establish lease agreements with non-FSC-customers for the lease of certified products?

**Overview of results****Summary of the results:**

A total of 125 stakeholders provided feedback on lease agreements. Of these, 26% found it feasible, 18% found it not feasible, and 56% remained neutral.

**Key Insights:**

There is a general level of consistency across stakeholder groups on this section, with most participants expressing a neutral view. The Economic chamber was the main source of responses indicating that the proposal was not feasible, whereas the other chambers mainly viewed it as either neutral or feasible.

**Question 27:****Overview of results**

A total of 125 stakeholders provided feedback on lease requirements, Of these, 26% found it not clear,” 23% found it clear,” and 51% remained neutral.

**Key feedback from participants:**

The main comments in this section can be grouped into two categories. One group requested additional clarification and guidance on role of lessor vs lessee and product eligibility after lease. The other group questioning whether leasing should be included in the CoC standard at all.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Lease agreement is feasible</b>	Some respondents noted that leasing could be workable because lease arrangements inherently involve contracts, making it possible to add FSC requirements.	No response
<b>Questioning the relevance of leasing</b>	Stakeholders' question whether leasing should be included in the CoC standard at all. They viewed it as rare, unnecessary, and irrelevant for their operations, adding complexity, bureaucracy, and contradicting system streamlining goals.	The conceptual phase report, studies and engagement by the FSC Circularity Hub and accompanying report published collectively provided the rationale for incorporating leasing concept into the FSC CoC Standard.  The leasing requirements are voluntary and does not apply to organizations without leasing in their scope.

**12 Sourcing reclaimed materials****12.1 Supplier audit programme**

No.	Question
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- 28 To what extent do you agree with the exemption introduced for the supplier audit programme? Please provide the rationale for your answer
- 29 Specify any part of the requirements that are not clear and provide suggestions for improvement.

## **Overview of results**

### **Summary of the results:**

A total of 151 stakeholders provided feedback on this question. Of these, 72% agreed with the exemption introduced for the supplier audit programme, while 6% expressed disagreement and 23% remained neutral.

### **Key Insights:**

There is consistency across stakeholder groups on this section, with the majority expressing agreement with the changes. Once again, any disagreement comes primarily from the Economic North chamber, while the other chambers express either agreement or neutrality.

### **Key feedback from participants:**

The main comments in this section expressed support for the exemption, noting that it reduces the burden on certificate holders by avoiding duplicate audits and lowering administrative workload and costs.

Below is the key feedback from participants:

<b>Feedback</b>	<b>Comments</b>	<b>FSC Response</b>
<b>Support the exemption reduces burden on CH</b>	Support the exemption, stating it avoids duplicate audits, lowers administrative workload and costs, and makes the process more efficient. They see it as a logical step when suppliers are already audited by an FSC-accredited certification body.	No response.
<b>Integrity concerns</b>	Exemptions may weaken control over reclaimed materials, create openings for errors, or shift responsibility away from certificate holders. Some argue that relying on external audits could reduce system rigor or be difficult to verify in practice.	FSC considers that this exemption does not weaken system control, as suppliers would be assessed by an FSC-accredited Certification Body within the last 12-months, following a regular third-party evaluation process. The measure is intended to reduce costs and avoid duplication of efforts. In addition, the requirements still mandate validation and ongoing monitoring of all suppliers, ensuring continued control and oversight.
<b>Request for clarification and guidance</b>	Clearer rules on what evidence is required to prove a supplier was already audited, how audit timing should be defined	The term 'same calendar year' have been replaced with '12-months', clarifying the intended exemption for suppliers audited by an FSC-accredited certification body since the last audit. Chain of Custody requires the certificate

	(calendar year vs. 12 months).	holder to maintain all relevant records/ evidence of activities included in certification scope. If a CH indicates that its supplier had already been audited, evidence of such must be submitted to their CB for verification.
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**Key feedback from participants for Question 29:**

**Overview of results**

The main comments in this section focused on requests for greater clarification and simplification, including clearer definitions and practical examples to distinguish between the different categories of reclaimed materials.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Request for clarification, simplification and guidance</b>	Request clearer definitions and simple examples to distinguish all reclaimed material categories. Practical illustrations such as decision trees and evidence list to support consistent classification. Calls for simplifying requirements, by aligning with existing schemes (EN 643, ISO).	Additional examples, illustrations and clarifications will be included in the guidance document.

**12.2 Salvaged Wood**

No.	Question
30	To what extent do you agree with the exemption introduced for the supplier audit programme? Please provide the rationale for your answer
31	Specify any part of the requirements that are not clear and provide suggestions for improvement.

**Overview of results**

**Summary of the results:**

A total of 152 stakeholders provided feedback on Question 30. Of these, 36% agreed with considering non-forest salvaged wood as neutral within the FSC system, 34% expressed disagreement, and 30% remained neutral.

**Key Insights:**

There is inconsistency across stakeholder groups on this section. Certificate Holders expressed a higher level of disagreement than any other group, with disagreements exceeding their level of agreement. In contrast, the other stakeholder groups show a more consistent pattern, with agreement outweighing disagreement.

**Key feedback from participants:**

The main comments on this question can be divided into two main perspectives. Those who disagreed with the changes raised concerns about verification challenges, as well as potential risks to integrity and credibility. They highlighted practical difficulties in verifying the true origin of non-forest salvaged wood, noting that distinguishing between forest and non-forest sources is often not feasible.

On the other hand, respondents who agreed with the changes expressed support for its neutral classification, citing lower risk to the FSC system and alignment with circularity principles. Some noted that non-forest salvaged wood poses no direct risk to forest management and can therefore reasonably be treated as neutral.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<p><b>Questioning inclusion of salvaged wood: higher efforts but limited scope</b></p>	<p>Respondents question whether salvaged wood should be included in the FSC chain of custody, citing limited relevance and disproportionate administrative effort. Many note that its inclusion may not contribute meaningfully to responsible forest management. Concerns are raised about potential integrity and credibility risks if the category remains within the system.</p>	<p>Salvaged wood (including those from urban areas) is already recognized within the FSC system (see definition in FSC-STD-40-004 V3-1). Excluding it from the standard would effectively classify it as a neutral material, meaning it would not be subject to CoC controls. This approach has been identified as posing potential risks to the system's credibility and integrity, as it could allow such materials to enter the FSC supply chain without adequate oversight.</p>
<p><b>Opposition to classifying non-forest salvaged wood as neutral material</b></p>	<p>Many stakeholders oppose classifying non-forest salvaged wood as neutral because it removes traceability and legality safeguards. They argue this creates a pathway for uncontrolled or illegal material to enter FSC product groups.</p>	<p>The terminology and definition proposed in Draft 1-0 have been revised to address the concerns raised. Two approaches are proposed:</p>
<p><b>Need for safeguards: controlled wood or minimum traceability requirement should be applicable</b></p>	<p>Responses call for maintaining safeguards such as Controlled Wood requirements, due diligence, and basic legality checks. Stakeholders argue that non-forest salvaged wood still carries social, environmental, and legality risks. They recommend applying adapted CW criteria to ensure traceability and prevent misuse while keeping the system robust.</p>	<p>1. The term "non-forest salvaged wood" has been revised to "non-forest-based wood" (see definition in D2-0), with the explicit exclusion of agricultural and agroforestry wood. Under this approach, such materials would be assessed as controlled material by application of FSC-STD-40-005, thereby ensuring appropriate due diligence and risk mitigation.</p>
<p><b>Verification challenges, integrity and credibility risks</b></p>	<p>Stakeholders highlight practical challenges in verifying the true origin of non-forest salvaged wood. They note that distinguishing forest from non-forest sources is often impossible in real supply chains. Respondents warn that unclear verification procedures increase the risk of fraud, misclassification, and audit inconsistencies.</p>	<p>2. A recommendation has been made for FSC to undertake a structured research and development initiative to further assess the implications of including non-forest-based wood in the system. This work would examine aspects such as impact, relevance</p>
<p><b>Support for neutral classification, lower risk to</b></p>	<p>Some respondents support treating non-forest salvaged wood as neutral because it poses no direct forest management risk. They emphasize that neutrality can promote circularity, resource</p>	

<b>FSC and circularity</b>	recovery, and reduced pressure on forests. Supporters believe neutral classification simplifies procedures while encouraging the reuse of valuable material.	for FSC, legal considerations, classification, and market demand, while addressing stakeholder concerns. The objective is to generate robust evidence and analysis to inform FSC decision-making bodies on whether, and under what conditions, these materials could be considered claim contributing and to which FSC claims (e.g., FSC Mix only or FSC Recycled as well).
<b>Grant recognition as claim contributing, incentivizes recovery and market use</b>	Several stakeholders argue that non-forest salvaged wood should contribute to FSC claims to recognize its environmental benefits. They note that neutrality offers no market incentive for recovery or certification. Respondents propose allowing claim contribution to reward circularity and avoid discouraging the use of salvaged wood.	

**Question 31:**

**Overview of results**

A total of 149 stakeholders provided feedback. Of these, 40% expressed disagreement with considering non-forest salvaged wood as a claim-contributing input, while 30% agreed and 30% remained neutral.

**Key Insights:**

Disagreement with these changes shows a degree of consistency across stakeholder groups, with respondents expressing disagreement or neutrality more frequently than agreement. This pattern is also reflected at the chamber level, where all chambers show some level of disagreement.

**Key feedback from participants:**

Comments from participants can be grouped into three main themes. The first group emphasized that including non-forest salvaged wood, particularly urban salvaged wood, could weaken FSC’s credibility, as such materials lack a verifiable forest management origin and clear eligibility criteria. They highlighted risks related to misclassification, potential loopholes, and misuse.

The second group raised broader concerns about credibility and integrity, noting that high-value materials from urban, agricultural, or semi-natural sources could enter the FSC supply chain without adequate legality, labour, or environmental safeguards.

The third theme focused on mitigation measures. Respondents called for a risk-based approach, clearer requirements, and robust documentation. Many supported inclusions only if strict risk mitigation measures are applied, with a strong emphasis on clear definitions, eligibility criteria, and practical examples distinguishing valid from invalid salvaged sources.

Below is the key feedback from participants for Question 31:

<b>Option</b>	<b>Comments</b>
<b>Credibility and integrity risk</b>	Making non-forest salvaged wood claim-contributing could weaken FSC’s credibility because the material lacks verifiable forest-management origin and clear eligibility criteria. They highlight risks of misclassification, loopholes, and fraud, especially in contexts with weak documentation or unclear definitions of “outside the forest matrix.” Many stress that FSC’s current systems cannot reliably verify legality, sustainability, or traceability for urban, agricultural, or land-conversion wood,

	creating inconsistent assurance and potential consumer confusion. For these reasons, they argue the material should remain neutral or be subject to Controlled Wood-like safeguards before any claim contribution is considered.
<b>Incentivize market, recovery and circularity</b>	Emphasize that non-forest salvaged wood offers strong circularity and climate benefits by diverting usable wood from waste streams into long-life products. The material is well-documented, traceable, and easily verifiable, making it suitable for recognition within FSC claims. Recognizing this wood as claim-contributing could strengthen incentives for recovery, increase responsible material supply, and align FSC with growing circular-economy markets.
<b>Operational and system burden</b>	Regulating such a minor material stream increases system complexity with little benefit and diverts resources from FSC's core mission of responsible forest
<b>Reduce pressure on forests; Circularity and market opportunity</b>	Emphasize that non-forest salvaged wood, especially urban salvaged wood, presents clear circularity and climate benefits by diverting recoverable material from waste streams into long-life products and reducing pressure on forests.
<b>Risk Mitigation</b>	
<b>Exclude from standard</b>	Salvaged / non-forest wood should not be included in the FSC Chain of Custody standard. <b>Key reasons:</b> <ul style="list-style-type: none"> <li>• It adds complexity with minimal system benefits;</li> <li>• It risks misclassification, errors, loopholes and loss of credibility;</li> <li>• Salvaged classification as neutral without adequate control, will undermine FSC integrity;</li> <li>• Fears of creating gateways for fraud or weaken traceability.</li> </ul>
<b>Apply FSC-STD-40-007</b>	Mitigation can be handled within the existing FSC-STD-40-007 standard rather than creating new rules. <b>Suggestions include:</b> <ul style="list-style-type: none"> <li>• Accepting municipal permits, utility records, yard intake logs, geo-tagged photos, stump photos, etc., as objective evidence;</li> <li>• Relying on existing reclaimed material verification tools, sampling audits, and contingency procedures;</li> <li>• Strengthening origin verification and supplier audits</li> </ul>
<b>Apply FSC-STD-40-005</b>	Non-forest salvaged wood should be handled through the Controlled Wood standard, not the CoC standard. <b>Key proposals:</b> <ul style="list-style-type: none"> <li>• Incorporate non forest salvaged wood into FSC-STD-40-005 under a dedicated section (e.g. "Non-Forest origin Controlled Wood");</li> <li>• Require basic CW-level due diligence: legality, documentation of origin, and clear exclusion of forest derived material;</li> <li>• Use simplified criteria because risk of deforestation is low for urban or municipal removals.</li> </ul>

### 12.3 Proposal A

No.	Question
32	To what extent do you agree with proposal A? Please provide the rationale for your answer

#### Overview of results

##### Summary of the results:

A total of 131 stakeholders provided feedback on Question 32. Of these, 40% agreed with proposal A, 21% expressed disagreement, and 39% remained neutral.

##### Key Insights:

Agreement with these changes shows a degree of consistency across stakeholder groups. Notably, the level of neutral responses among Certificate Holders is significantly higher than in other stakeholder groups. Overall, a consistent pattern is observed across both stakeholder groups and chambers.

##### Key feedback from participants:

Among those who provided feedback, one of the most prominent themes was circularity and environmental benefits. A significant number of stakeholders warned that granting claim-contributing status could dilute FSC Recycled claims, mislead consumers, and allow uncertified products or co-products into the system.

At the same time, others highlighted potential benefits, such as reducing pressure on forests by reusing production waste instead of sourcing virgin wood, supporting the circular economy through increased recycling, improving material efficiency, and preventing waste from going to landfill.

Stakeholders also proposed several mitigation measures, particularly related to eligibility and traceability. These included requiring legal proof of waste status, allowing eligibility only when solid wood is no longer usable, and avoiding the reclassification of usable offcuts.

Below is the key feedback from participants for Question 32:

Option	Comments	FSC Response
<b>Ensures system fairness as equivalent to paper</b>	Stakeholders argue that pre-consumer reclaimed wood should receive the same treatment as pre-consumer reclaimed paper since both are forms of secondary material and share similar risks, benefits, and waste dynamics. They highlight that the current inconsistency, paper qualifies for claim contribution while wood does not is perceived as unfair, confusing, and logically inconsistent. Several note that both materials undergo comparable recycling processes in industry; therefore, aligning the rules would resolve long standing stakeholder frustration and improve coherence in FSC’s approach to reclaimed inputs.	Pre-consumer materials which are legally classified as waste are proposed to be eligible for full claim contribution within the FSC system. This approach is intended to minimize risks by ensuring that only officially classified pre-consumer (wood, bamboo, cork, forest-based fibres) waste materials

<p><b>Circularity and environmental benefits</b></p>	<p>Many Stakeholders emphasizes that recognizing pre-consumer reclaimed wood as claim contributing strengthens circularity, reduces waste, discourages energy recovery incineration, and increases the availability of recycled raw materials. They highlight that reclaimed wood supports cascading use, lowers pressure on forests, and allows wood panel and manufacturing industries to increase recycled content sometimes up to 100%. It promotes environmental efficiency, reduces reliance on virgin inputs, simplifies market access, and aligns FSC with global circular economy expectations.</p>	<p>are eligible for claim contribution.</p> <p>To operationalize this, a distinct material category “Pre-consumer+” has been defined for D2-0 consultation. Under this category, only pre-consumer materials that are officially recognized as waste by a competent authority (e.g., through waste documentation, stamps, or equivalent legal designation) would be eligible to contribute to FSC claims.</p>
<p><b>Apply clear and robust requirements</b></p>	<p>Stakeholders support inclusion only if FSC implements clear definitions, strong verification rules, and auditable safeguards ensuring pre-consumer material is truly waste and not intentionally produced or misclassified co-products. Suggestions include requiring an explicit waste stamp, documentation such as waste codes, permits, geolocation, and photos, plus risk-based audits and explicit eligibility criteria. Others call for distinguishing pre- vs post-consumer fractions transparently, harmonizing definitions with international waste regulations, and ensuring traceability when both streams mix in recycling markets.</p>	<p>This would apply across relevant material types, including wood, bamboo, cork, and rattan, excluding paper.</p> <p>Pre-consumer wood materials that do not meet the Pre-consumer+ criteria would remain classified as pre-consumer reclaimed wood and would maintain zero claim contribution status.</p>
<p><b>Credibility and integrity concerns</b></p>	<p>A significant number of stakeholders warn that granting claim contributing status could dilute FSC Recycled claims, mislead consumers, and allow uncertified co-products (e.g., sawdust, offcuts – from primary processing) to enter the system under the guise of reclaimed. They highlight risks of greenwashing, intentional waste production, misclassification, weak verifiability, and conflicts with legal frameworks such as EUDR. Many stress that pre-consumer wood often lacks documented forest origin, is hard to distinguish from standard production residues, and may undermine FSC’s credibility, demand for FM certification, and the integrity of chain of custody controls.</p>	<p>This approach ensures an enforceable distinction between verified waste materials and other pre-consumer inputs, thereby addressing stakeholder concerns on risks while maintaining robust safeguards for the credibility.</p>
<p><b>Mitigation Measures</b></p>		

<p><b>Eligibility and traceability (waste)</b></p>	<ul style="list-style-type: none"> <li>• Require legal proof of waste status (waste transfer notes, waste codes, PRO/EPR records, AVV classification).</li> <li>• Accept eligibility only when solid wood is destroyed (chips, sawdust), avoiding reclassification of usable offcuts.</li> <li>• Apply FSC-STD-40-007 and other verification tools: geo-tagged photos, stump/yard logs, municipal/utility documents, visual inspection, contingency steps.</li> <li>• Exclude material intentionally generated to gain reclaimed status; ensure outputs never exceed plausible input volumes.</li> <li>• Treat pre- and post-consumer wood equally only when legally classified as waste.</li> <li>• Use risk-based audits, random supplier checks, and documentation reviews to confirm authenticity.</li> <li>• Provide global, harmonized definitions and clear eligibility guidance to avoid inconsistencies.</li> </ul>
<p><b>Certified and CW sources only</b></p>	<ul style="list-style-type: none"> <li>• Allow claim contribution only from FSC-certified manufacturers own processes or verified CW sources.</li> <li>• Require pre-consumer material to undergo DDS aligned with FSC Controlled Wood.</li> <li>• Maintain strict segregation between certified and non-certified pre-consumer inputs to prevent misclassification.</li> <li>• Restrict eligibility to low-risk product groups (e.g., wood-based panels) where origin and contamination risks are minimal.</li> <li>• Require independent verification and supplier origin confirmation for mixed or complex supply chains.</li> <li>• Prevent such material from contributing to high-value claims (e.g., FSC 100%) to protect claim integrity.</li> <li>• Some respondents recommend rejecting Proposal A entirely, stating only certified/CW verified material should qualify.</li> </ul>

## 12.4 Proposal B

No.	Question
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**33** To what extent do you agree with proposal B? Please provide the rationale for your answer

### Overview of results

#### Summary of the results:

A total of 126 stakeholders provided feedback on Question 33. Of these, 31% agreed with proposal B, 21% expressed disagreement, and 48% remained neutral.

#### Key Insights:

While around half of the participants remained neutral on Proposal B, Certificate Holders expressed a higher level of disagreement than agreement compared to other stakeholder groups.

#### Key feedback from participants:

The main rationale provided by participants was that certified or controlled sources are essential to ensure credibility. They emphasized that pre-consumer reclaimed wood should only contribute to FSC claims when it originates from FSC-certified or controlled wood inputs, supported by verifiable evidence.

Below is the key feedback from participants for Question 33:

Feedback	Comments	FSC Response
<p><b>Certified or controlled sources ensure credibility</b></p>	<p>Pre-consumer reclaimed wood should only contribute to FSC claims when it originates from FSC certified or Controlled Wood (CW) inputs, with verifiable evidence.</p> <ul style="list-style-type: none"> <li>• Preserves credibility, integrity and traceability of FSC claims;</li> <li>• Prevents misclassification or fraud, such as rebranding uncertified offcuts as reclaimed material;</li> <li>• Avoids misleading consumers by ensuring that claim contributing material genuinely comes from responsibly managed forests.</li> <li>• Maintains a clear and trustworthy link to FSC assured supply chains.</li> </ul>	<p>During the Draft 1-0 consultation a proposal was consulted to allow certified organizations to sell recovered materials with their original FSC Mix % or Credit claim and add a declaration confirming the reclaimed status of such materials to enable their eligibility as inputs into FSC Recycled products. Stakeholders raised concerns about the complexities and segregation challenges regarding the proposal.</p> <p>To address this, a new claim category FSC Pre-Consumer has been introduced for the Draft 2-0 consultation. This allows materials recovered from the secondary processing of certified/ controlled inputs to be sold with a claim reflecting the proportion of certified content (e.g. FSC Pre-Consumer X% / Credit) allowing them as eligible input into the FSC Recycled product group. Organizations that receive pre-consumer materials (e.g., wood, bamboo, cork, ratan, forest-based fibre) with the FSC pre-consumer claim are not required to follow the requirements for “Sourcing reclaimed materials”.</p>
<p><b>Segregation challenges, further complexity, and lower value addition</b></p>	<p>Concerns about practical feasibility. Many argue that Proposal B introduces:</p> <ul style="list-style-type: none"> <li>• High segregation demands, requiring companies to separate certified offcuts from non-certified ones is often unrealistic in mixed-production environments</li> <li>• Administrative and operational complexity, making the system harder rather than more streamlined</li> <li>• Limited available volumes, as only a small fraction of pre-consumer residues come from fully certified input streams</li> <li>• Low added value, since many such products can</li> </ul>	<p>The claim has specifically been created to remove a limitation in the V3-1 of FSC-STD-40-004, where production residues classified as the parent material (FSC Mix) is not an eligible input for FSC recycled claim and when classified as pre-consumer it has no claim contribution.</p> <p>Furthermore, segregation of certified and controlled reclaimed materials is not required before the FSC Pre-consumer claim can be used, as only the equivalent proportion of certified input contributes to the claim (%/Credit). This ensures that non-certified materials are not elevated to the same status as certified materials, thereby addressing integrity and risk concerns raised by stakeholders on the competition of non-certified pre-consumer materials and FSC-certified materials.</p>

	already be sold as FSC Mix for other products.	Note: If production reclaimed materials contain non-FSC claimed material (non-eligible inputs) it is not eligible be sold with the FSC pre-consumer claim.
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### 13 Eligibility criteria for CoC operation models

#### 13.1 CoC operation models

No.	Question
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34 To what extent do you support the change in Section 15 “CoC operation models”? Please provide the rationale for your answer

#### Overview of results

##### Summary of the results:

A total of 149 stakeholders provided feedback on the CoC operation models. The majority agreed with the changes, while only 7% expressed disagreement and 28% remained neutral.

##### Key Insights:

While there is strong overall agreement with the changes, Certification Bodies show a higher level of disagreement compared to other stakeholder groups.

##### Key feedback from participants:

The main rationale provided by participants was that the changes are positive, clear, and reasonable. There is strong support for consolidating the eligibility criteria for single, multi-site, and group CoC into a single section.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Clear and reasonable changes</b>	<ul style="list-style-type: none"> <li>• Strong support for consolidating eligibility criteria for Single, Multi-site, and Group CoC into one section</li> <li>• Viewed as improving clarity, coherence, and user-friendliness of the standard</li> <li>• Reduces duplication and simplifies navigation and interpretation for certificate holders and CBs</li> <li>• Seen as streamlining audits, training, and implementation when definitions are applied consistently</li> </ul>	No response
<b>Unclear on single certification</b>	<ul style="list-style-type: none"> <li>• Confusion about how the new “single site with sub-sites” model differs from</li> </ul>	The proposed change to the single certification eligibility criteria used the terms and definitions to simplify the standard while

<p><b>eligibility criteria</b></p>	<p>previous “single certificate with multiple sites”</p> <ul style="list-style-type: none"> <li>• Uncertainty whether single certificates may include locations in multiple countries</li> <li>• Ambiguities and internal inconsistencies in the definitions of site and sub-site (legal entity, exclusivity, purchasing/sales authority)</li> <li>• Concerns that existing single-site certificate holders may be forced into multi-site certification unintentionally</li> <li>• Concerns about eligibility criteria being embedded in definitions rather than auditable requirements</li> </ul>	<p>maintaining the necessary restrictions. Terms and definitions are also normative and set out how specific terms are understood in the scope of the certification. The focus in draft 2-0 is on amending the site and sub-site definitions.</p> <p>If the nonconformities were raised due to the wrong application of specific terms, such as site and sub-site, then the nonconformities will be raised against the related clause.</p> <p>Single certifications may include locations in multiple countries, provided that the Organization meets the eligibility criteria and site and sub-site definitions.</p>
<p><b>Unclear on multi-site certification eligibility criteria</b></p>	<ul style="list-style-type: none"> <li>• Lack of clarity on revised structure and logic of multi-site clauses (e.g., changes within Clause 15.2)</li> <li>• Questions about the relationship between sites and optional sub-sites under multi-site certification</li> <li>• Concerns that editorial restructuring may affect interpretation without sufficient explanation</li> </ul>	<p>This concern is linked to the gap between single certification and multi-site certification. The site and sub-site definitions have been updated for clarity.</p> <p>The drafted multi-site certification eligibility criteria underwent minor edits to improve structure while ensuring no new requirements were added.</p>
<p><b>Concern about group certification eligibility criteria</b></p>	<ul style="list-style-type: none"> <li>• Disagreement with relaxing or aligning group eligibility criteria too closely with multi-site models</li> <li>• Concerns that group certification inherently carries higher risk due to weaker ownership/control links</li> <li>• Scepticism about removing geographic or size restrictions without sufficient safeguards</li> <li>• Preference for regional (rather than global) thresholds for group eligibility to reflect local realities</li> </ul>	<p>A global threshold ensures fairness in global trade. In the meantime, it is aimed to reduce additional procedures for the overall simplification of the certification.</p> <p>Regarding the regional approach, even within the same region, there are still economic differences.</p>
<p><b>Suggest to add extra materials for further clarification</b></p>	<ul style="list-style-type: none"> <li>• Suggest for decision trees, flowcharts, or comparison tables to help organizations choose the correct certification model</li> </ul>	<p>Annex A of FSC-STD-40-004 V3-1 will later be moved to a guidance document to ensure the simplicity of the normative requirement.</p> <p>FSC will consider stakeholders’ feedback while further developing supporting</p>

	<ul style="list-style-type: none"> <li>• Need for illustrative examples of common organizational structures (e.g., production, trading, logistics)</li> <li>• Retain or reintroduce explanatory tables (e.g. Annex A) to support consistent CB interpretation</li> <li>• Clearer explanation of operational differences between sites and sub-sites</li> </ul>	documents for implementing the new standard.
<b>Other potential implementation issues</b>	<ul style="list-style-type: none"> <li>• Practical challenges not fully addressed by the revised eligibility framework (e.g. complex global trading structures, accounting only sites, centralized sales)</li> <li>• Concerns that real-world operational models may not clearly fit into single or multi-site categories under V4-0</li> <li>• Risk of increased administrative burden or unnecessary transition to more complex certification models</li> </ul>	<p>The sub-site definitions have been redrafted to capture different implementation scenarios. FSC continues to seek feedback from stakeholders on the relationship between the main site and sub-sites within a single certification to further clarify.</p> <p>Site and sub-site definitions aim to capture different implementation scenarios, and they may be translated differently across organizations. For example, a log yard with a contractual relationship with the site can be included in a single certification.</p> <p>The new definition of single certification may cause companies to fit into a different operational model, or some single certifications may have to switch to multi-site certifications, and vice versa. FSC seeks feedback on concrete examples of single certification implementation in the market to improve the site and sub-site definitions.</p>

## 13.2 Group certification eligibility criteria

No.	Question
35	To what extent do you support the change in Section 15 “CoC operation models”? Please provide the rationale for your answer
36	To what extent do you support the change in the setup of group certification? Please provide your suggestion of change.

### **Overview of results**

#### **Summary of the results:**

A total of 159 stakeholders provided feedback on Group certification eligibility criteria. 38 % agreed with the changes, while 31% expressed disagreement and 31% remained neutral.

#### **Key Insights:**

There is no strong overall opinion on these changes, as shown in the chart. However, there is some inconsistency in stakeholder perspectives. Certification Bodies show more disagreement than any other stakeholder group, and at the chamber level, disagreement is primarily observed in the Economic North and Social North chambers.

**Key feedback from participants:**

The key rationales regarding the changes can be grouped into two main themes. Those who agreed with the changes expressed support for the criteria, noting that the updates remain relevant and accessible, and emphasized that thresholds need updating to reflect current economic realities.

Conversely, those who disagreed raised concerns about weakened oversight, arguing that reliance on internal audits reduces credibility, whereas sampling and third-party audits provide greater assurance due to mandatory compliance with ISO/IEC 17065 and FSC standards 20-001 and 20-011.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Support the criteria/ The change remains relevant and accessible</b>	Stakeholders view that thresholds require updating to reflect economic realities also revised criteria may improve accessibility for SMEs	No response
<b>Reduce FSC revenue due to AAF reduction</b>	Concern about the potential reduction of FSC revenue if lower AAFs encourage shifts from single to group certification	As observed, participating sites tend to join group certification not to avoid or minimize the AAF. The main purpose of joining group certification is to benefit from technical and administrative support from the central office, especially for companies that lack the capacity to launch CoC certification on their own, and to reduce the overall certification costs.  FSC will continue assessing the likelihood of financial impact, and act accordingly via the AAF Policy.
<b>Risk on transition from single to group certifications</b>	Some concern about weakened oversight due to internal audits and sampling/ third-party audit offers more credibility due to mandatory compliance with ISO 17065, FSC-STD-20-001, FSC-STD-20-011, national accreditation body, ASI). Furthermore, concerns about conflicts of interest and current limitations do not target small companies. Additionally concerns that a	An internal audit is required to perform activities similar to CB’s audit; new requirements have been added to further align with FSC-STD-20-011 and FSC-STD-20-001. In addition to the internal audit, CB can request a larger sample if there is concern about the central office's performance in implementing the central office audit programme.  Group certification aims to support small and medium-sized companies. Companies with sufficient capacity to implement a single certification tend not to switch to group certification administered by another party. Therefore, the massive number of movements

	massive number of single certifications will move to group (up to 75% of CHs in 1 CBs fall under this threshold)	may not occur, based on research in eight countries with higher thresholds. There are already companies with a higher threshold under the current standards, when the turnover is high, but the number of employees is below 15 (in accordance with 16.1 a) ii. (No more than 15 employees (full-time equivalent))
<b>Limitation on participating sites</b>	Concern about removing limits on group size. Suggestion on retaining or lowering caps to manage audit risk, system credibility and better target to small companies. Much larger groups can be well-managed with minimal risk to the FSC system	The upper limit on group size is removed because there are very few central offices in the market with group sizes larger than 200. Fewer than 10 group certifications globally exceed 400. Some central offices are splitting their group certification into two due to the current threshold, thereby only increasing the administrative burden. Considering the hypothetical case in which a new group certification joins the FSC system with a large number of participating sites, it would be challenging to monitor potential risks to the system. The working group concluded that a minimum starting group size should be set.
<b>Retain a maximum of 15-25 employees</b>	Concern that higher FTE thresholds weaken the focus on micro-enterprises and larger organizations may be suitable for single certification	The number of employees is based on market research on the definition of small enterprises. A maximum of 49 FTE is consistently used in various studies on the definition of small enterprises. Further details will be provided in the report on Question 36.
<b>Re-consider on "forest product turnover" term</b>	Stakeholders have concern on inconsistent interpretation of forest product turnover. Another view is that large companies with high annual turnover but low FPT, they still need support. Suggestion on clearer definitions or simplified calculation methods	The FPT criterion has been substituted by the 'total turnover' (exception being the USA, in line with the current FSC-PRO-40-003a), as in the current FSC-STD-40-004 V3-1.
<b>Other suggestions</b>	Suggestion on considering regional or country-specific approaches and on clearer distinctions between multi-site and group certification criteria	Regional or country-specific approaches were discussed. However, it would increase implementation bureaucracy, and different thresholds would create varying levels of market acceptance globally. Group and multi-site certifications target two different groups of stakeholders. Before making the decision to change, the working group seeks

		a clear justification or an example of uncertainty regarding the group and multi-site certification.
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**Question 36:**

**Overview of results**

A total of 153 stakeholders provided feedback on setup for group certification. 35 % agreed with the changes, while 33 % expressed disagreement and 32% remained neutral.

**Key Insights:**

There is no strong overall opinion on these changes, as shown in the chart. However, stakeholder perspectives are somewhat inconsistent. Certification Bodies exhibit more disagreement than any other group, while Certificate Holders show the highest proportion of neutral responses among stakeholders.

**Key feedback from participants:**

The key rationales regarding the changes can be grouped into two main themes. Those who disagreed with the changes requested that the limitations on group certification be maintained or reduced, for example, reducing the maximum group size to preserve audit effectiveness. The second theme focused on maintaining restrictions and set criteria for territoriality and homogenizing the certification scope, using territorial, legal, or regional criteria to ensure effective oversight.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Retain/ reduce the group certification limitation</b>	Retention or reduction of maximum group size to maintain audit effectiveness. Important to prevent groups from becoming excessively large or geographically dispersed Central office with 500 members would become like a CB but without accreditation requirements. In some countries (US), removing the 500 cap is considered a positive change	The CB has the right to stop the growth, as the audit results (the growth rate can be 0%). In draft D2-0, group certification can no longer be set in multiple countries. Monitoring potential risks to the system would be challenging if the new group certification were to start with a large number of participating sites. Therefore, as in draft D2-0, a minimum starting group size of 100 was set, and we are seeking feedback on whether it should be lowered.
<b>20-011: Increase sampling for big group certification</b>	Adjustment of external audit sampling rates for large groups Alignment of sampling intensity with group size and risk exposure	The risk index is modified to account for cases in which group certification exceeds 500 participating sites.
<b>Set the limit on 1 central office 1 group certification</b>	Limitation of group management to one group per central office Separation of group management roles to avoid concentration of control	The same central office has different group certifications based on the characteristics of such groups. Also, there is no evidence of a rising risk when a central office manages multiple group certifications.

<p><b>Focus on the central office's management capacity</b></p>	<p>Assessment of group eligibility based on management capacity rather than numerical thresholds</p> <p>Adding more criteria for CB's audit to reduce the risk</p> <p>Emphasis on competence, language capacity, audit logistics, resources, systems, and oversight capability of the central office</p> <p>Maintain strong internal control system requirements to protect certification integrity.</p>	<p>Clause 16.3.1 is included in the central office's management capacity; "resources" already includes the language and other criteria.</p> <p>The clause is sufficient for the certification body to audit and assess the central office's ability to manage the number of participating sites.</p> <p>Changed to 16.3.1; rephrased to ensure that the central office team has adequate competence to manage the group and multi-site certification, rather than focusing solely on the certification manager.</p>
<p><b>FSC-STD-20-011: Establish further verification options for the certification body</b></p>	<p>Introduction of additional verification mechanisms beyond routine sampling. Availability of targeted, random, or unannounced audits for higher-risk situations</p>	<p>The CB has the right to conduct an unannounced audit (according to FSC-STD-20-001) if there's any information, including substantiated concerns, about the integrity of a certain group certification.</p> <p>Furthermore, FSC-STD-20-011 (draft version and related advice notes) specifies the scenarios in which unannounced audits are mandatory (in relation to False Claims, and high risk for integrity in relation to CLR).</p>
<p><b>Maintains the restriction/ set criteria for territoriality and/or homogenize certification scope</b></p>	<p>Use of territorial, legal, or regional criteria to maintain effective oversight. Application of homogeneity requirements based on product scope, sector, or regulatory context</p>	<p>The territorial, legal, or regional criteria and the scope of participating sites do not affect the central office's ability to manage the number of participating sites.</p>
<p><b>Suggestion of change on specific clauses</b></p>	<p>Clarification and alignment of specific clauses and cross-references</p> <p>Refinement of definitions, risk indicators, and procedural wording</p> <p>Clauses 16.1.3 d); 16.1.4, 16.1.5, 16.1.6 (administrative requirement). 16.2.4 c), g); 16.2.1 (central office's management system)</p>	<p>Minor amendments were made to Clauses 16.1.3 d), 16.1.4, 16.1.6, 16.2.4.</p> <p>The following clause is removed: "16.1.5. If a participating site acts as the central office, the central office may exclude that site from the central office audit programme." Because the functions of the participating site and the central office differ, exclusion may pose an integrity risk.</p> <p>The criteria for high-risk participating sites were added to clause 16.2.4 f) so that the central office can identify them.</p> <p>The clause numbers in draft D2-0 are amended to align with the overall change.</p>

<b>Set different requirements between group and multi-site certification</b>	Differentiation of requirements reflecting distinct governance and risk structures. Tailoring of sampling, audit, and control measures to certification model characteristics	The requirements, without specifying an operational model, apply to both multi-site and group certification.  Certain requirements apply to specific cases. For example, certifications from sites that do not share common ownership apply to the group and some multi-site certifications.
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### 13.3 Evaluation of group and multisite chain of custody certificates

No.	Question
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**35** To what extent do you support the change in Section 15 “CoC operation models”? Please provide the rationale for your answer

#### Overview of results

##### Summary of the results:

A total of 151 stakeholders provided feedback on setup for group certification. 42 % agreed with the revised clause 16.3.4 on auditor’s qualification, while 30 % expressed disagreement and 28% remained neutral.

##### Key Insights:

There is no strong overall opinion on the revision, as shown in the chart. However, stakeholder perspectives are somewhat inconsistent: Certificate Holders exhibit more disagreement than any other group, while Certification Bodies show the least intent to disagree.

##### Key feedback from participants:

Comments on this section can be grouped into two main topics. Those who disagreed with the revision argued that the changes would increase costs for certificate holders, raise training expenses for auditors, and lead to greater reliance on external consultants.

Conversely, those who agreed with the changes supported them, noting that they strengthen qualification requirements, improve audit quality and consistency, and align with certification body auditor standards.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Support the change</b>	<ul style="list-style-type: none"> <li>• Strengthened qualification requirements linked to improved audit quality and consistency</li> <li>• Alignment with certification body auditor standards</li> <li>• Transitional arrangements for</li> </ul>	No response

	existing auditors	
<b>Increase costs for CHs/ increase training costs for auditors</b>	<ul style="list-style-type: none"> <li>• Higher costs for certificate holders due to formal training requirements</li> <li>• Increased reliance on external consultants</li> <li>• Disproportionate burden for SMEs and large groups</li> </ul>	The clauses are amended using the current requirements and INT-STD-40-003_02 as a basis. The key difference being a shift from an ASI-approved training programme to formal FSC CoC auditor qualification – it's expected to streamline the process, while ensuring a similar level of competency. The former note in D1-0 has been converted into a normative requirement [Clause 18.3.4 c)], minimizing any disruption between the implementation of the aforementioned Interpretation and Clause 18.3.4 b) (FSC-STD-40-004 V4-0 D2-0).
<b>Consider qualification through work experience/</b>	<ul style="list-style-type: none"> <li>• Qualification based on professional experience and demonstrated competence <ul style="list-style-type: none"> <li>• Skills-based and risk-based competency assessment</li> </ul> </li> <li>• Limited suitability of formal certificates as sole qualification criteria</li> </ul>	<p>Clause 16.2.4 is an additional requirement for certifications with more than 20 participating sites. The central office's auditor is required to meet the qualifications set out in Section 16.3.</p> <p>Clauses 16.3.2 and 16.3.3 set the requirements for professional experience and related skills.</p> <p>Clause 16.2.4 sets out the formal qualifications (formally recognized, high-level auditing competence) as a mitigation measure in growing multi-sites/ groups: as the CB sampling is lower, it ensures there's consistency in the implementation of the requirements, irrespective of the audit type (internal or external).</p>
<b>Wording change suggestions</b>	<ul style="list-style-type: none"> <li>• Ambiguous wording and scope (e.g. group vs. multi-site); "individuals acting as FSC CoC auditors" to "individuals acting as the central office's auditors";</li> <li>• Suggest auditor's qualifications be based on the sites for which an auditor is responsible (large multi-site has several auditors)</li> </ul>	Changed the wording of the requirement for further clarity. In the case of multi-site certification, the certification meets the requirements set out in this clause; the auditors must meet those requirements, for example, in the case of multi-site certification that are not linked through a common ownership.
<b>Same criteria for all</b>	<ul style="list-style-type: none"> <li>• Different requirements for new and existing auditors</li> <li>• Inconsistent qualification criteria</li> </ul>	The current setup of normative requirements is based on potential integrity risk. A group with more than 20 participating sites would pose a higher risk and therefore require stricter requirements.

	<p>across group, multi-site, and CB auditors</p> <ul style="list-style-type: none"> <li>• Uneven assurance levels</li> </ul>	<p>It is important to balance the limited availability of auditors in the market with the concern about uneven assurance levels.</p>
<b>Conflict of interest</b>	<ul style="list-style-type: none"> <li>• Internal auditors operating under central office management</li> <li>• Overlap between consulting and auditing roles</li> <li>• Independence risks not fully addressed by qualification requirements alone</li> </ul>	<p>Internal auditor operating under central office management, but is required to meet the requirements on experience and other requirements set out in Section 16.3 (18.3 in D2-0). The auditor is required to be objective and impartial; sampling of participating sites from CB is intended to evaluate the auditor's performance.</p> <p>The qualifications and performance of the internal auditor directly affect the central office's performance. In a group and multi-site operational model, each party plays a different role: The central office provides support and administrative management, the central office's auditor ensures the implementation of CoC requirements in each participating site, and CB evaluates the performance of the central office, including the performance of the central office's auditor.</p>
<b>Risk of lacking auditors in the market</b>	<ul style="list-style-type: none"> <li>• Limited availability of qualified auditors</li> <li>• Risk of reduced auditor supply due to stricter criteria</li> <li>• Need for accessible training pathways (offers from FSC Academy)</li> </ul>	<p>FSC acknowledges the issue of lacking auditors in the market. Therefore, the qualification for internal auditors is set more strictly at the threshold of 20 participating sites.</p> <p>A stricter requirement aims to enhance the credibility of group and multi-site operational models in the long run, with minimal short-term impact (current central office auditors are still allowed to perform audits without formal training).</p> <p>FSC Academy can be a supplementary source for enhancing knowledge about CoC requirements. However, a formal lead auditor training course also covers practical experience and discussions on CoC requirements and how to perform an audit.</p>

### Key feedback from participants for Question 38:

Additional comments called for more clarification and practical examples, including clear definitions, illustrations, and guidance. Beyond issues related to certification scope and applicability, respondents also questioned which organizations or products require certification and expressed confusion regarding the certification requirements.

The following clauses were amended based on feedback from Question 38:

- Administrative requirements: 16.1.3, 16.1.4, 16.1.5, 16.1.6, 16.1.7, Informative guidance 2;
- Central office's management system: 16.2.4, 16.2.5;
- Qualification of certification manager and the central office's auditors: 16.3.1, 16.3.2, 16.3.4;
- Central office audit programme: 16.4.1, 16.4.2, 16.4.3, 16.4.6, 16.4.7, 16.4.9;
- Requirements for the participating sites: 16.7.1;
- Annex 4: Additional requirements for the issuance of nonconformities by the central office, in alignment with FSC-STD-20-001.

## 14 Addressing False Claims

### No. Question

- 39 To what extent do you agree with the changes made in Annex 2 “Addressing False Claims”?  
Please provide the rationale for your answer

#### Overview of results

##### Summary of the results:

A total of 157 stakeholders provided feedback on this question. Of these, 48% expressed disagreement with the changes made to Annex 2 regarding false claims, 35% expressed agreement, and 17% remained neutral.

##### Key Insights:

While many participants expressed disagreement with the changes, Certificate Holders and Certification Bodies share a consistent view, both showing more disagreement than agreement. In contrast, Consultants, FSC members, and staff generally expressed more agreement than disagreement.

##### Key feedback from participants:

The key feedback and rationales provided by participants can be grouped into two main categories. Those who disagreed with the changes raised concerns about the mandatory use of FSC Trace, suggesting it should not be required for any organizations. They indicated dissatisfaction with requiring FSC Trace for high-risk CHs or their suppliers/buyers.

On the other hand, participants who agreed with the changes praised the improved clarity, better organization, and streamlined content.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Inaccurate claims should be separated</b>	some stakeholders requested to bring back the definition of 'inaccurate claims' and that separate provisions (lighter) to be provided to these instances	D2-0 re-introduced 'Inaccurate Claims' in this annex and separate provisions are required for False vs. Inaccurate claims.
<b>Mandatory use of FSC Trace should be removed for CH/or other organizations</b>	some responses indicated discontentment of mandatory FSC Trace for high-risk CHs and/ or for their direct supplier/buyer	D2-0 is revised and mandatory use of FSC Trace is removed. In case of repeated non-deliberate False Claims, additional unannounced audits will be applied to certificate holders.
<b>Requirements are not clear and need better clarification to address different scenarios</b>	There are some responses that indicate this topic need more work and needs to be clearer to address different scenarios	The requirements are revised to add clarity and address different scenarios of producing Vs. receiving False claims.

## 15 FSC Core Labour Requirements Self-Assessment

No.	Question
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40 To what extent do you agree the revised self-assessment is clear and user-friendly? Please provide the rationale for your answer

### Overview of results

#### Summary of the results:

A total of 154 stakeholders provided feedback on the revised self-assessment. Of these, 48% agreed that it is clear and user-friendly, while 29% disagreed and 23% preferred to remain neutral.

#### Key Insights:

While most participants expressed agreement with the changes, Certificate Holders showed a higher level of disagreement than any other stakeholder group. From a chamber perspective, all disagreement originates from the North chambers (Economic, Social, and Environmental), while no disagreement is observed from the South chamber.

#### Key feedback from participants:

The comments can be categorized into two main groups. Those who agreed with the changes expressed support, noting that the revisions are clear and user-friendly. In contrast, those who disagreed raised concerns about the practicality of the self-assessment, including the potential administrative burden for certificate holders.

Below is the key feedback from the participants:

Feedback	Comments	FSC Response
<b>Request for clarification, including guidance</b>	Request for more clarification on certain elements of the self-assessment and/or its applicability	Comments requested clarity on whether description was required or simply reference to documents, and requested the document to be provided in template form. Other comments reiterated sentiment that the self-assessment and policy requirements linked to FSC CLR were 'unnecessary tasks'.  For the implementation, the self-assessment will be provided in template format to be easily downloadable by stakeholders. In terms of guidance to facilitate filling in the template, the language has been amended to focus on 'explanation' where organizations consider themselves not to conform. See Annex 3 in D2-0 to view the changes.
<b>Risk-based approach for self-assessment</b>	Suggestion for self-assessment only and no further evaluation for low-risk	Multiple comments suggested no self-assessment should be required for those in no/low risk as it represented a 'useless bureaucratic burden' which adds time and cost without much value.

<b>General request for more risk-based approach/change(s)</b>	Request for a more risk-based solution.	The requirement to provide information in the self-assessment has been amended for D2-0 to limit this information to those areas considered of 'high risk', with reference to the FSC CLR Risk Matrix. For countries where all FSC CLR are low, there would be no requirement to provide the self-assessment for itself, unless there are outsourcers based in another country where there is at least one FSC CLR considered as 'high risk'. See particularly Section 14 in FSC-STD-20-011 V4-3 D2-0 for more information.
<b>Practicality, use, and value concerns</b>	Concerns on the practicality of the self-assessment, including the potential administrative burden for certificate holders, the value of the assessment, and how it is used in the evaluation.	Elements of the self-assessment have been removed to allow for information about outsourcing to be provided separately.  The self-assessment requirement itself has been amended to address concerns on proportionality of the audit in low risk contexts, with the proposal to focus at minimum on areas considered of higher risk, based on the FSC CLR Risk Matrix.
<b>Suggestion for change(s)/improvement(s)</b>	Suggestions for drafting and improvements to make the self-assessment more usable and user-friendly	Suggestions included removing the date requirement as 'DD/MM/YYYY' as the format varies by country, provision of a digital template, and removal of the outsourcer section. For the outsourcer section, this was discussed in working group but still considered to provide some value, with it clear that the information about the outsourcers can be provided in a separate document referenced. The date format has been included only as an example in D2-0.

## FSC-STD-20-011 RESPONSES

### 1 Evaluation at the level of the site

No.	Question
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- |   |  |
|---|--|
| 1 | To what extent do you agree with the changes made in section 6 "Evaluation at the level of the site"? Please provide the rationale for your answer |
|---|--|

#### Overview of results

##### Summary of the results:

A total of 123 stakeholders participated in this section. Of these, 62% agreed with the changes made in evaluation at the level of the site, while 5% expressed disagreement and 33% remained neutral.

##### Key Insights:

There is general consistency across stakeholder groups in their agreement with the changes made in section 6.

**Key feedback from participants:**

The majority of the comments expressed support for the proposed changes, particularly the remote audit provision, which allows audits to be conducted remotely under defined conditions. This was widely seen as practical, flexible, and well aligned with recent experiences. Additional comments supported INT-STD-20-011\_28, noting that it provides useful clarification on when non-FSC certified sales records must be reviewed.

Below is the key feedback from participants:

Concern	Comments	FSC Response
<b>Support for Remote Audit Provisions</b>	Respondents expressing support for the ability to conduct remote audits under defined conditions without requiring derogation, viewing it as practical, flexible, and aligned with recent experience.	No response
<b>Support for INT-STD-20-011_28 Integration</b>	Positive feedback on incorporating INT-STD-20-011_28, which clarifies when non-FSC certified sales records must be reviewed, seen as strengthening system integrity and transparency	
<b>Support for Clarity and Consolidation</b>	General positive feedback on streamlining, consolidating, and clarifying evaluation requirements to improve consistency and reduce duplication.	
<b>Suggestions for improvement and guidance</b>	Suggestions for providing more operational examples, decision trees, comparative tables, or illustrative guidance to support consistent implementation and interpretation by certification bodies	Additional examples, illustrations and clarifications will be included in the guidance document.

## 2 Sampling - Selection of sites for group and multisite chain of custody certification

No.	Question
2	To what extent do you support the change in Section 7 “Sampling of group and multi-site certification”? Please provide the rationale for your answer
3	Please share any additional concerns or suggestions in relation to evaluation of multi-site and group certification requirements.

**Overview of results**

**Summary of the results:**

A total of 128 stakeholders participated in this section. Of these, 52% agreed with the changes made in sampling of group and multi-site certification, while 14% expressed disagreement and 34% remained neutral.

**Key Insights:**

There is general consistency across stakeholder groups in their agreement with the changes made in Section 7. However, the highest level of disagreement comes from certification bodies, which show a significantly higher rate of opposition compared to other stakeholders (28% versus 12%). From a chamber perspective, all recorded disagreement originates from the Economic and Environmental North chambers.

**Key feedback from participants:**

The comments on this section can be grouped into two main themes. The first calls for stricter auditing requirements for high-risk sites, supporting increased audit intensity and stronger assurance where the risk of non-compliance is higher.

The second theme advocates for more flexible requirements for low-risk sites, suggesting reduced audit intensity for consistently low-risk operations and emphasizing efficiency gains through risk-based sampling.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Requirements have value-added</b>	Support for revised evaluation requirements improving audit quality and credibility, risk-based differentiation of audit effort, Clearer structure compared to previous requirements	No response
<b>Loosening low-risk sites auditing requirements</b>	Suggestion on reduced audit intensity for consistently low-risk site with emphasis on efficiency gains through risk-based sampling and reference to past compliance performance as a justification factor	The sampling rate is based on the risk and could be lowered if the certification performs well (based on the risk index matrix).
<b>Stricter high-risk sites auditing requirements</b>	Support for increased audit intensity for high-risk sites and stronger assurance where non-compliance risks are higher and focus on targeted sampling and verification for risk-exposed sites	Moving forward with the proposed higher sample for high-risk participating sites. The risk index is adjusted to reflect a larger number of participating sites (>1000). Sampling is applied only for the CB audit; the central office is required to audit all participating sites annually, and high-risk participating sites are required to be documented.
<b>Maintain the minimum sampling rate</b>	Some stakeholders have concern about reduced credibility if minimum sampling thresholds are lowered. Emphasis on baseline sampling as a safeguard for system integrity and preference for retaining existing minimum sampling levels	The clause requirement is amended to clarify that the number of sampled participating sites determined by the formula is the minimum requirement, allowing certification bodies to increase the number of samples if needed. A minimum sampling rate is already prescribed; the minimum rotation is in clause 7.11.
<b>Lacking requirements; unclear wording</b>	There were some concerns on insufficiently specified requirements ambiguous terminology and interpretation risks. Suggestion on clearer definitions and thresholds	Reviewed and revised D2-0 clauses 7.9, 7.12.

<b>Concerns on auditing methodology across countries</b>	Some stakeholders have concerns on inconsistent application of auditing methodologies across regions. Reference to differing national contexts affecting audit outcomes	D2-0 has removed the possibility for multi-country group certification, and therefore this clause has been removed.
<b>Loosening high-risk sites' auditing requirements</b>	There were concerns on reduced audit intensity for high-risk sites and maintaining proportionality between risk level and audit effort	The classification (high-risk, low-risk participating sites) is for the CB to identify the set of sites and relevant requirements to be audited. The high-risk participating site definition lists scenarios that may pose a higher risk of mixing or of CLR, and it needs more attention and should be treated as a separate set of sites. A different audit intensity between these two sets of sites is important so evaluation follows a truly risk-based approach (likelihood where the risk might occur).
<b>Differentiation between multi-site and group</b>	Some suggestions on clearer distinction between governance and risk structures with emphasis on differing roles of central office and site management	The working group suggested further clarifying this in the guidance document.

**Key feedback from participants for Question 3:**

**Overview of results**

The comments in this section can be classified into two main themes. The first requests supplementary guidance, including templates, calculation examples, and documentation standards. The second seeks clearer risk definitions and classification criteria, calling for objective, unambiguous criteria and examples to distinguish high-risk from low-risk sites.

Based on the key feedback, definition of the “set of sites”, clauses 7.5, 7.7, 6.8, 7.9 and 7.12 were discussed and amended.

**3 Evaluation of contractors operating under outsourcing agreements**

**3.1 High-risk outsourcing agreements**

No.	Question
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4 To what extent do you agree with criteria of high-risk outsourcing agreements (risk of mixing)? Please provide the rationale for your answer

**Overview of results**

**Summary of the results:**

A total of 109 stakeholders participated in this section. Of these, 50% agreed with criteria of high-risk outsourcing agreements, while 12% expressed disagreement and 39% remained neutral.

**Key Insights:**

There is general consistency across stakeholders regarding the changes in this section, with certificate holders predominantly choosing to remain neutral. All recorded disagreement originates from the Economic and Environmental North chambers, while no opposition was noted from other chambers.

**Key feedback from participants:**

Comments on this section can be grouped under a single main theme: support for the risk-based criteria, with positive feedback highlighting the effectiveness of the risk-based approach in identifying high-risk outsourcing agreements, particularly those involving mixing risks.

Below is the key feedback from participants:

Feedback	Comment	FSC Response
<b>Support for Risk-Based Criteria</b>	Positive feedback on risk-based approach to identifying high-risk outsourcing agreements focused on mixing risks	No response
<b>Concerns about Criteria Completeness</b>	Concerns that criteria are incomplete, missing risk factors, or not adequately covering all scenarios	D2-0 is revised and the criteria for high-risk contractors are updated. Based on the feedback of stakeholders, the working group tried to make the criteria more realistic and based on actual risks. As a result, criterion <u>d) the contractor is employed for the activities critical for the development and maintenance of the CoC management system (i.e., purchasing, selling, DDS)</u> is removed.
<b>Request for Refinements to Criteria</b>	Suggestions for additional risk factors, exceptions, or modifications to the criteria	

**3.2 Reclassify a high-risk outsourcing agreement to low-risk**

**No. Question**

5 To what extent do you agree with providing the option to reclassify a high-risk outsourcing agreement to low-risk, provided that there are evidence of risk mitigations by CH? Please provide the rationale for your answer

**Overview of results**

**Summary of the results:**

A total of 113 stakeholders participated in this section. Of these, 66% agreed with providing the option to reclassify a high-risk outsourcing agreement to low-risk, while 10% expressed disagreement and 24% remained neutral.

**Key Insights:**

There is general consistency across stakeholders regarding the changes in this section.

**Key feedback from participants:**

Comments on this section can be grouped under a single main theme: support and positive feedback on allowing reclassification with evidence of mitigation.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Support for Reclassification Option</b>	Positive feedback on allowing reclassification from high-risk to low-risk with evidence of mitigation	No response
<b>Concerns about Mitigation Evidence Standards</b>	Concerns about what types of evidence are acceptable, objectivity, or standards for risk mitigation	As per the requests of stakeholders, criteria for lowering the risk classification for contractors on risk of mixing have been defined as below: if the contractor was audited by The Organization's Certification body at least once during The Organization's past five (5) years and it did not result in a nonconformity in regards to the risk of mixing and: a) the contractor exclusively works with The Organization; or b) the contractor handles only FSC eligible input material and segregation is not required.
<b>Too burdensome and complex to clarify and reclassify for CBs</b>	One stakeholder stated that this would be too burdensome for CBs	
<b>Request for Guidance and Examples</b>	Requests for examples, templates, or practical guidance on acceptable risk mitigation	Additional examples, illustrations and clarifications will be included in the guidance document.

### 3.3 Requirements for evaluation of CLR

No.	Question
6	To what extent do you agree with the approach for the requirements for evaluation of CLR for contractors to follow a similar approach to that of the evaluation of the Organization? Please provide your opinion on: (1) the clarity of the high-risk indicators; (2) any suggestions for improvement.

#### Overview of results

##### **Summary of the results:**

A total of 115 stakeholders participated in this section. Of these, 46% agreed with approach for the requirement for evaluation of CLR for contractors, while 31% expressed disagreement and 23% remained neutral.

##### **Key Insights:**

There is general consistency across stakeholders regarding the changes in this section. Certificate holders, however, expressed the highest level of disagreement, with 40% opposing the changes compared to 25% among other stakeholder groups.

##### **Key feedback from participants:**

Comments on this section can be grouped into two main themes. The first includes drafting suggestions and general recommendations for improvements. The second reflects support for applying the same approach to contractors as to organizations under the FSC CLR. Additionally, some stakeholders requested consistency with the risk of mixing, including the ability to reclassify based on mixing-related risks.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Support for Approach</b>	Supports the idea of the approach for contractors following the same as organizations for FSC CLR.	No response.
<b>Request for consistency with mixing</b>	Requests that risk of CLR is treated consistently with the risk of mixing, and therefore ability to re-classify applied to risk of mixing.	FSC acknowledges the comment and sentiment that the FSC CLR evaluation provides for more prescriptiveness than the risk of mixing. These are considered separate and different risk dimensions. The certification body may re-classify the risk level for risk of mixing based on specific criteria, provided in Clause 12.5 of D2-0. The CLR are not the same, however the presentation has been mirrored – see Clause 12.6 of D2-0.
<b>Drafting suggestion/suggestion for improvement</b>	Some comments suggested for FSC to create a more stringent rather than equivalent approach for contractors versus organizations, while others requested a reduced burden.	FSC has somewhat addressed the risk issue, by implementing a more consistent approach for both, however this is not more stringent for contractors; it keeps the consistency to address the comments regarding additional complexity. One consistent approach keeps one rule for organization and contractor, acknowledging the limitations that come with dealing with uncertified contractors.
<b>Request for clarity/Indicators unclear</b>	Indicators are considered unclear and more clarity is requested on the practicalities.	With revised proposal, the evaluation requirements for contractors mirror those of the organization, and therefore in the sample, interview(s) with workers would be required for any outsourcing agreements that are classified as ‘high risk’ and included in the sample. Similarly, for the determination of risk classification for the outsourcing agreement, a ‘second-/third-party audit’ would require to include interviews with workers to potentially be used by the certification body to consider the outsourcing agreement as ‘low risk’.
<b>Concern of feasibility/application/resource requirements</b>	Concern for treating the contractors in the same way as organization, the practical impact on evaluation including resource and cost implications.	
<b>Disagreement/Removal of CLR for Outsourcing</b>	General discontent and disagreement with contractors being evaluated for CLR, including on historical grounds.	FSC acknowledges the comments, however the requirements for outsourcers have been discussed since 2021, and have been in place since 2023, with the rationale for this provided in the relevant advice notes ( <a href="#">ADVISE-40-004-23</a> and <a href="#">ADVISE-20-011-16</a> ), with more detail in the response to Question 23.
<b>Rely on legislation and CH check</b>	View that the approach for evaluating the contractor should rely more heavily on legislation applicable and the certificate holder checking, rather than the CB.	The revised proposal in D2-0 includes more of a risk-based approach, however this does not strictly rely on the legislation of the country where the contractor is located. Reliance purely on existence of legislation rather than the effectiveness of such legislation in practice creates credibility gaps, and therefore the new proposal aims to rely more heavily on the multi-stakeholder outcome of the process for creating FSC risk assessments. This is considered more robust and also removes creates more a

		level-playing field, by removing the potential subjectiveness of the certification body determining the initial risk level by providing one per FSC CLR at the country/territory level.
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### 3.4 Evaluation of contractors operating under outsourcing agreements

No.	Question
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7 Contractors will be sampled from two pools based on risk of mixing and CLR. To what extent do you agree with evaluation of contractors based on these two risk scenarios? Please provide the rationale for your answer

8 To what extent do you agree with the changes made in section 12 “Evaluation of contractors operating under outsourcing agreements”? Please provide the rationale for your answer

**Overview of results**

**Summary of the results Question 7:**

A total of 116 stakeholders participated in this section. Of these, 60% agreed with the evaluation of contractors based on these two risk scenarios, while 16% expressed disagreement and 23% remained neutral.

**Key Insights:**

There is general consistency across stakeholders regarding the changes in this section.

**Key feedback from participants:**

Comments on this section can be grouped into two main themes. The first reflects support for the two-pool approach, endorsing the sampling of contractors from separate pools based on mixing and CLR risks. The second highlights concerns that this approach may increase complexity in evaluations and could lead to a higher overall evaluation burden.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Support for Two Pools Approach</b>	Support for sampling contractors from two separate pools based on mixing and CLR risks	No response.
<b>Support for Combined 1 Pool Approach</b>	Prefers a combine pool approach where all high risk is included in one pool.	From the stakeholders, this comment was limited to two responses, with majority support for the current approach, which has existed since 2023. This approach is maintained in D2-0 and supported by the working group.
<b>Concern on gaps/omissions through sampling</b>	Concerns on sampling and potential to miss evaluating high risk contractors.	Sampling has inherent risks of missing elements and drawing incorrect conclusions, due to the fact not all within a sample are audited. However, it is commonly used as a part of a risk-based approach to ensure efficient resource allocation and focus on ‘high risk’.

		D2-0 retains the requirement for the certification body to consider the sample that reaches 'balanced coverage' of both scenarios – see Clause 12.8 in D2-0 for more detail.
<b>Queries and Suggestions on evaluation approach, guidance etc.</b>	Questions and suggestions on how the evaluation would work, in terms of achieving a representative sample for both risk dimensions etc.	Additional examples, illustrations and clarifications will be included in the guidance document.
<b>Request for clarification including definition of term(s)</b>	More clarity requested on specific terms such as mixing.	
<b>Concern on additional complexity</b>	Concern that this approach adds complexity for the evaluation and may result in more evaluations.	The approach provided is the current approach, however certain stakeholders consider this adds complexity 'without clear guidance on prioritisation and complexity'. Examples can be provided in the guidance provided as part of the implementation activities.
<b>Disagreement/ Removal of CLR for Outsourcing</b>	General discontent and disagreement with contractors being evaluated for CLR, including on historical grounds.	Contractor topic was discussed extensively and it was decided to limit the applicability of FSC CLR to the organization, discussions since 2021 lead to the inclusion, with the changes in this revision as consequence. The rationale for inclusion ensures the FSC CLR is upheld for workers in direct supply chains providing activities for the certification holder. Descriptive argumentation on why contractors should be excluded in V3-1 were not provided nor included in the comments in this consultation.  CLR is a key component of CoC certification and same as other requirements, is applicable to contractors as well. However, FSC has adopted a more risk-based approach in this topic.

## Summary of the results Question 8:

### Overview of results

A total of 112 stakeholders participated in this section. Of these, 51% agreed with the changes on evaluation of contractors operating under outsourcing agreements, while 13% expressed disagreement and 36% remained neutral.

### **Key Insights:**

There is general consistency across stakeholders regarding the changes in this section.

### **Key feedback from participants:**

Comments on this section were largely in favour of the changes, expressing support for the updates in Section 12 and a generally positive view of the proposed approach to outsourcing evaluation.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Supportive of changes in Section 12</b>	Positive overall on the changes presented for outsourcing evaluation.	No response.
<b>Request for only high-risk CB evaluation</b>	Request for a risk-based approach, which focuses on high-risk only, and leaves low risk with reduced audit burden. Suggestion for only high-risk to require evaluation.	Low-risk requirements have been limited and match those for the Organization.
<b>Drafting suggestion</b>	Suggestions on drafting changes.	Suggestions included applying the same risk designation for Puerto Rico as United States of America (US). The FSC Risk Matrix has been updated and incorporates the <u>FSC Controlled Wood Risk Assessment</u> for countries that have one, including US. However, Puerto Rico is not in the scope of this risk assessment and therefore is viewed as a separate, unincorporated territory, and therefore treated as such. However, in general changes in this section are made to add clarity and reduce ambiguity.
<b>Request for clarification/guidance</b>	Queries on the terminology used and interpretation of the clauses considered confusing.	More clarification on the process for evaluating contractors, with respect to the FSC CLR Matrix's application is included in the consultation of D2-0, which mirrors the approach for organizations. On terminology, the definition of first-/second-/third-party audit is largely taken from the ISO definitions, and were included in <u>ADVICE-20-011-16</u> , and in D1-0. These were discussed by the working group, however considered understandable, with the 'first-party' definition removed to reflect the changes to the requirements, which now refer only to 'second-/third-party'.
<b>Practicality concerns</b>	Concerns on the practicalities, including the expectations on certification bodies and ability to evaluate at contractor-level.	Comments on Clause 12.10 (Clause 12.11 in D2-0), requiring contractors where the agreement has expired to be included in the sampling calculation have been addressed, with new requirements in Section 13 of FSC-STD-40-004, as the agreement is to include the right of audit up to twelve months after - see Clause 13.6d) in FSC-STD-40-004 V4-0 D2-0 for more detail.

## 4 Evaluation of FSC core labour requirements

### 4.1 provision of a risk classification per country

No.	Question
9	Do you generally support the provision of a risk classification per country for each FSC CLR provided by FSC? Please provide the rationale for your answer

**10** Do you agree with the provision of indicators to lower the FSC CLR Risk Matrix risk classification by one (1) level?

**11** What other indicators would you include, for the certification body to justify lowering the risk classification? Please provide comment(s) and example(s).

**Summary of the results Question 9:**

A total of 124 stakeholders participated in this section. Of these, 67% Support the provision of a risk classification per country for each FSC CLR provided by FSC, while 10% expressed disagreement and 23% remained neutral.

**Key Insights:**

There is general consistency across stakeholders regarding the changes in this section, with the majority expressing support or remaining neutral toward the provision.

**Key feedback from participants:**

Comments on this section were largely in favour of support for risk-based classification at CLR level and suggested approach.

Below are the key concerns from participants:

Concerns	Comments	FSC Response
<b>Supportive of flexibility/ability to lower classification</b>	Positive comment on the ability to use matrix as starting point, with still flexibility to reduce classification.	No response.
<b>Request for clarification on methodology and practical use</b>	Request for clarification on methodology, background indices, and method to update and apply matrix.	Requests for more clarification on the methodology and the matrix have been addressed with further elaboration on the matrix, provision of the full list of countries during the consultation, and opportunity to provide further feedback.  The concerns specifically related to the objectivity of sources that were not FSC risk assessments have not been fully addressed, as the reference to global indices and datasets is maintained for countries without existing risk assessments. The revised approach meets the suggestions to prioritize the risk assessments over any other sources, however, without alternative suggestions the others have been maintained.
<b>Concern on complexity</b>	Concerns on this approach adding complexity, including in audit cost and time requirements	These comments related mostly to the concept of high risk requiring more worker interviews. With the proposed changes to the FSC CLR Matrix and the associated risk classifications, as well as the changes to the sampling approach for worker interviews, which includes the potential to reduce the

		sample size if the interview includes the worker representative(s), the cost and time implications are considered reduced if compared to the D1-0 proposal.
<b>Drafting change/improvement suggestion</b>	Suggestions to improve the draft requirements, with additional considerations.	Suggestion to include more clarity that worker interviews are confidential is addressed, with D2-0 including explicit reference to this in Clause 14.6.2 in D2-0.
<b>More risk-based/alternative approach requested</b>	Different more risk-based approach requested, to consider different risk dimensions.	Several stakeholders highlighted that the country-approach misses some nuances that may exist at the subnational or sector level. An approach that considers such elements may represent a 'more coherent, robust, and effective' approach. However, as this approach uses the country risk as a starting point only, without the aim of creating a complex risk assessment that include industries or sub-regions, for which the data is not readily available, this suggestion has not been addressed.
<b>Not supportive.</b>	Not supportive of suggested approach.	Suggestions included that FSC CLR goes beyond the FSC mandate and only ILO or tripartite sources are reputable as all suggested are biased. Without direct reference to suitable alternatives that could capture all relevant FSC CLR, the working group worked towards prioritising the existing risk assessments, which are the result of a multi-stakeholder engagement process, to alleviate stakeholder concerns.

**Summary of the results Question 10:**

**Overview of results**

A total of 115 stakeholders participated in this section. Of these, 55% Support the provision of indicators to lower the FSC CLR Risk Matrix risk classification by one level, while 14% expressed disagreement and 31% remained neutral.

**Key Insights:**

There is general consistency across stakeholders regarding the changes in this section, with the majority expressing support or remaining neutral toward the provision.

**Key feedback from participants for Question 11:**

**Overview of results**

Comments on this question can be grouped into two main categories. The first concerns lowering the classification solely based on mitigation measures, including permitting it even in high-risk integrity situations. The second relates to recognition of third-party audits or social audits, suggesting that permitted audits be extended to include PEFC, ISO 45001, SA8000, or equivalent national certifications.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
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<p><b>Legal compliance/government inspection(s)</b></p>	<p>Include indicators such as legal compliance where strong law enforcement in place; labour inspectorates enforcing legal requirements reports could be used.</p>	<p>The existence of legal provisions does not automatically mean conformity. However, with the revised approach prioritising the use of the existing risk assessments with coverage of a large percentage of countries with certificates, law enforcement is considered within the related processes to conclude the risk assessment, and therefore this is considered within the approach.</p>
<p><b>Recognition of Third-party audits/Social audits</b></p>	<p>Extend third-party audits permitted to include PEFC, ISO 45001, SA8000, or equivalent national certifications.</p>	<p>SA8000 is already considered as an FSC-approved verification scheme. For others referenced, these are not yet considered as 'FSC-approved', however the criteria to lower the risk classification based on a 'third-party audit' are not limited to only 'FSC-approved' schemes; third-party audits can be used to 'lower' the risk classification, if they meet the criteria provided. This retains the concept from the Advice Note (<a href="#">FSC-ADVICE-40-004 23</a>), which has been revised only minorly in D2-0.</p>
<p><b>Lowering classification only with mitigation measure(s)</b></p>	<p>Permit the lowering even in high-risk integrity situations, provided these are time-bound and to be re-evaluated.</p>	<p>The reference to 'high-integrity risk' is amended to specify CLR, meaning that those in specific supply chains/countries considered as 'high integrity risk' would be unable to lower the risk level. As this is currently only applicable to Myanmar (see <a href="#">ADV-STD-20-011-20 V1-1</a>), it is not foreseen that a country or supply chain would be added to this list without due consideration and investigation, led by the FSC system integrity unit.</p>
<p><b>Worker representation measure(s)</b></p>	<p>Include worker representation, such as effective worker committees, trade unions, or collective bargaining agreements as an indicator for supported worker rights.</p>	<p>Worker representation has not been added as a standalone lowering criteria, however is referenced in the sampling proposal. See Clause 14.6.1 in D2-0 for more information.</p>
<p><b>Staff turnover and absence history</b></p>	<p>Consider staff turnover and absentia as an indication for high or low risk, with high turnover, change and absence indicating potential high-risk context/instability.</p>	<p>With consideration for the difficulty of providing one global benchmark for turnover and absence, as well as the potential availability of such information, these were not included as indicators in the revised proposal. This suggestion was only provided by two stakeholders.</p>
<p><b>Grievance mechanism(s)</b></p>	<p>Consider effective grievance mechanisms as an indicator, similar to worker representation, to show organizational maturity and means for workers to voice concerns and concerns acted on as an indicator to lower classification.</p>	<p>With acknowledgment that this proposal is useful to gauge maturity of the organization on its approach to workers' rights, this has not been added as an indicator.</p>

<b>NC and performance history</b>	Support for referencing past behaviour and performance by the organization.	The historical performance of the organization is already taken into account in the proposal. See Clause 14.3a) in D2-0.
<b>Business nature/ type/ supply chain</b>	Consider the geography as well as the type of business and number of workers, as well as the specific supply chain.	For suggestions to include criteria on type of business and number of workers, these have not been addressed for reasons described in
<b>Other public indices</b>	Consider reference to other indices such as: ILO NORMLEX, US Department of Labor List of Goods Produced by Child Labor or Forced Labor (ILAB), Social Progress Index (Social Progress Imperative), V-Dem Liberal Democracy Index (Varieties of Democracy Institute).	Reference to the ILO NORMLEX has been provided in the Information Guidance 3 in Section 14 of D2-0.
<b>Complaint/ Concern</b>	Complaints on the overall approach and process, including the indices used in the FSC CLR Risk Matrix; Concern for added complexity to system; and that lowering option gives certification bodies power to reduce, even in risk situations.	To address the concerns on subjectivity and complexity, the proposal aims to remove some subjectivity by creating one starting point for all organizations to be evaluated, instead of differing approaches dependent on certification body. This aims to provide more transparency for both the certificate holder and the certification body, and alignment between how organizations and uncertified contractors with outsourcing agreements are evaluated.

## 4.2 Provision of a risk classification per country

### No. Question

- 12** To what extent do you agree with the suggested sampling formulae for “high” and “medium” risk for determining minimum number of persons to interview? Please provide an alternative sampling formulae, or other suggestion(s) to facilitate a risk-based approach to CLR evaluation, including your rationale for the proposal(s)

### Overview of results

#### **Summary of the results for Question 12:**

A total of 117 stakeholders participated in this section. Of these, 25% agreed with the suggested sampling formulae for high and medium risk, while 27% expressed disagreement and 48% remained neutral.

#### **Key Insights:**

About half of the participants expressed a neutral opinion on this question. However, a notable conflict of interest exists between certificate holders and certification bodies versus other stakeholder groups. The

former showed more disagreement than agreement with the changes, while the latter expressed more agreement than disagreement. Unlike other sections, where disagreement was mostly confined to the Economic North chamber, here it is distributed across multiple chambers.

### Key feedback from participants for Question 12:

Comments on this topic can be grouped into two main areas. The first reflects concerns and complaints regarding proportionality and practicality, with some considering aspects unnecessary and sharing general sentiments about the FSC CLR. The second focuses on suggested changes, including accounting for employee types (management vs. operational staff) and the context to which the minimum requirements apply.

Below is the key feedback from participants:

Feedback	Comment	FSC Response
<b>Support for Formula</b>	Formula approach supported as considered more risk-based, scalable,	Stakeholders listed advantages and disadvantages of both approaches, with the suggestion that the impact is far greater for sites with large worker numbers, however there was greater preference for the formula which has been maintained in D2-0, with some more flexibility provided. See Clause 14.6.1 of D2-0 for more information.
<b>Support for Table</b>	Table approach supported as considered clearer.	
<b>Question on value of increased worker interviews</b>	Comment on the value of interviewing more; quality over quantity emphasised e.g., interview with worker representative would be a good alternative.	Considering the comments on quantity versus quality, flexibility is included in D2-0, to allow the sample to be smaller, where the worker representative is included. This follows the logic that interview with the worker representative is speaking on behalf of the workers. This also takes in consideration concerns regarding the resource time allocation required for worker interviews. See Clause 14.6.1 of D2-0 for more information.
<b>Complementary or alternative approach suggestion</b>	Suggestions include leaving to discretion of auditor, or minimum, interview with worker representative; Suggestion to keep ISO9011 concept with no fixed number or formula.	On the comments regarding the worker representative, please see above.  It was considered worthwhile to maintain the formula approach, rather than return to leaving the subjectivity of the certification bodies, in order to ensure more consistency than the current standard requirements provide.
<b>Request for changes</b>	Request to include employee type (management/operational staff); Consideration for context to which the minimum applies e.g., if there is an NC.	The inclusion to include sectoral risk was not included, based on no defined risk rating for sectors currently in the FSC chain of custody system. In terms of reference to historical performance, this is considered in the lowering criteria for the amending “high risk” to “low risk”, and this in turn impacts the requirement for minimum worker interviews. On stakeholder concerns suggesting limitation to “low” and “high”, this has been addressed in D2-0. On consideration of the type of worker, the general evaluation requirements apply (see Clause 6.1b) in D2-0), however the guidance can further elaborate with examples.
<b>Either option if clear enough</b>	No preference for table or formula, provided these are made sufficiently clear.	

<p><b>Concern/ Complaint</b></p>	<p>Proportionality and practicality concerns; Considered unnecessary; General sentiment on FSC CLR; View for judgement to remain with certification body; Concern that minimum would result in this being considered 'the maximum' needed by certification bodies.</p>	<p>The recurring stakeholder concern that this approach would result in a disproportionate number of interviews and high audit time are partly addressed with the flexibility of approach proposed in the revised D2-0. See Clause 14.6 of D2-0 for more information.</p> <p>On comments that this would encourage certification bodies to do only the minimum: the requirements provide the minimum to ensure a more level playing field on how FSC CLR is evaluated. There remains the possibility to go beyond, however stakeholders have cited that the proposed formula is already greater than their current approach. Providing the minimum sets a baseline that was not previously provided and conducting more interviews is left to the discretion of the qualified auditor, with consideration that the FSC CoC audit is not a social audit, and remains only one part of the audit.</p>
<p><b>Clarification request</b></p>	<p>Request for clarification on the workers applicable where shift patterns exist, to reduce potential minimum number.</p>	<p>On general clarification of application, the guidance information to support the implementation can provide examples on how requirements are intended to be applied.</p>

## 5 Surveillance evaluations

No.	Question
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**13** To what extent do you agree with the changes made in Section 15 “Surveillance evaluations”? please provide your rationale to the question above.

### Overview of results

#### **Summary of the results for Question 13:**

A total of 114 stakeholders participated in this section. Of these, 61% agreed with the changes made in surveillance evaluations, while 8% expressed disagreement and 32% remained neutral.

#### **Key Insights:**

There is general consistency across stakeholders regarding the changes in this section, with the majority expressing support or remaining neutral. Certification bodies represent the stakeholder group with the highest level of disagreement, accounting for 25%.

#### **Key feedback from participants for Question 13:**

Comments on this topic can be grouped into three main themes. Some stakeholders expressed support for formalized derogations, highlighting the value of incorporating generic derogations into the standard and providing clear rules for delayed surveillance audits in force majeure situations. Others raised concerns about various aspects of the proposed changes. A third group requested additional guidance and examples to support implementation.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Support for Formalized Derogations</b>	Responses expressing positive views on incorporating generic derogations into the standard, providing clear rules for delayed surveillance audits in force majeure situations, and improving systemic efficiency and predictability.	No response
<b>Positive changes in general</b>	Responses expressing general agreement with changes, providing minimal commentary, or stating no further evaluation needed without substantive feedback.	
<b>Support for Prohibiting Audit Waivers in High-Risk Situations</b>	Responses agreeing with prohibiting surveillance audit waivers following standard revisions and for organizations designated as having high-integrity risk, ensuring enhanced oversight where most needed.	
<b>Concerns with some provisions</b>	Responses expressing concerns about different aspects of the changes	4 stakeholders expressed concerns and proposed changes. D2-0 is revised based on these proposals and minor tweaks have been made to add clarity.
<b>Concerns about One-Month Postponement Rule</b>	Responses expressing concerns about the one-month postponement provision, arguing it creates scheduling problems, impacts cash flow, or weakens the annual audit schedule.	The working group decided to keep this provision as it provides clarity, and this already is allowed under a generic derogation. This flexibility only allows audits to be postponed up until January of the next year and will not have a huge impact on scheduling.
<b>Need for guidance and calibration among CBs</b>	Responses requesting providing more guidance and examples	Additional examples, illustrations and clarifications will be included in the guidance document.

## 6 Nonconformities (in group and multi-site certification)

### No. Question

14 To what extent do you support the change in Clause 16.4 on issuance of non-conformities to participating sites? Please provide the rationale for your answer

#### Overview of results

##### Summary of the results for Question 14:

A total of 120 stakeholders participated in this section. Of these, 69% agreed with the changes in clause 16.4 on issuance of non-conformities to participating sites, while 8% expressed disagreement and 23% remained neutral.

## Key Insights:

There is general consistency across stakeholders regarding the changes in this section, with the majority expressing support or remaining neutral.

## Key feedback from participants for Question 14:

The main comments on this section highlight several benefits of the proposed changes, including reduced duplication of nonconformities between the central office and site level, a lower administrative burden for both, improved efficiency in corrective action management, and clearer allocation of responsibilities for handling nonconformities.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Supportive of the change</b>	Stakeholders argue the change helps reducing duplication of nonconformities at central office and site level resulting in lower administrative burden for central offices, sites, and certification bodies. This improves efficiency in corrective action management and has clearer allocation of responsibility for nonconformity handling helps central offices in stronger managing corrective actions	No response
<b>Only NCs raised by CB can be evaluated by ASI</b>	Limitation of ASI evaluation to nonconformities issued by certification bodies. This reduces visibility of central-office-issued nonconformities in accreditation oversight and has implications for traceability and assurance consistency	The primary purpose of the CB's audit is to verify the central office's performance. The same nonconformity already identified by the central office should not be taken as evidence that the central office is not performing well – it rather shows that the management system has effectively identified (and corrected) the issue(s) as part of the ongoing monitoring. It is not the intent that organizations are 'penalized' for finding their own issues (key purpose of an internal audit) – which follows an ISO rationale.
<b>Wording change suggestions</b>	Need for clearer wording to avoid inconsistent interpretation and duplications and clearer allocation of responsibilities between central office, sites, and certification bodies	
<b>Removing the clause</b>	Risk of insufficient safeguards where internal auditing is weak Potential under-classification or downgrading of nonconformities and possibility of systemic issues remaining undetected	
<b>CB should retain the ability to issue related or escalated nonconformities</b>	Issuance of nonconformities where corrective actions are ineffective or incomplete and escalation in cases of repeated issues or missed timelines • Maintenance of certification body discretion and audit credibility	The CB audit report will provide an overview of the central office management performance, including the key identified issues from the internal monitoring and the effectiveness of the corrections and corrective actions. The accreditation body can still assess the CB assessment (and judgment) through the audit report and any accompanying evidence.

		The CB is still expected to raise a non-conformity in situations where (for example): the internal corrective action was not effective; the internal audit process failed to detect a systemic issue; the internal audit or corrective action was incomplete.
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## 7 Annex 5. Remote and Hybrid Audit

### 7.1 Requirements for remote and hybrid audit

No.	Question
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15 To what extent do you support the change in Clause 16.4 on issuance of non-conformities to participating sites? Please provide the rationale for your answer

#### Overview of results

#### Summary of the results for Question 15:

A total of 123 stakeholders participated in this section. Of these, 72% agreed with the requirements in Annex5 “Remote and Hybrid audit”, while 11% expressed disagreement and 17% remained neutral.

#### Key Insights:

There is general consistency across stakeholders regarding the changes in this section, with the majority expressing support or remaining neutral.

#### Key feedback from participants for Question 15:

The main comments on this section highlight strong support for the changes, emphasizing modernization and efficiency. Stakeholders widely support remote and hybrid audits as a necessary evolution, reflecting post-pandemic realities while improving efficiency and reducing costs and carbon footprint.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Strong Support - Modernization and Efficiency</b>	Responses strongly supporting remote and hybrid audits as necessary modernization reflecting post-pandemic reality, improving efficiency, reducing costs and carbon footprint, and maintaining continuity in adverse contexts.	No response
<b>Request for Expanded Eligibility</b>	Responses advocating for broader application of remote audits beyond the current scope, including for low-risk sites with no non-conformities, single product operations, finished goods handlers, and to reduce environmental impact.	D-2 is revised to add clarity on this topic. However, stakeholders did not provide concrete cases that could be added to the low-risk table (Table 3) in this annex, so no major changes have been made.

<b>Need for Clarity and Consistency</b>	Responses requesting clearer definitions of remote, hybrid, and on-site audits, better guidance on when each method is appropriate, clarification of eligible activities, and standardization to ensure consistent application across CBs.	
<b>Concerns about Labor Rights and Worker Interviews</b>	Responses expressing concerns that remote audits may miss critical details regarding workers' rights, trade union rights, and core labour requirements, particularly noting issues with confidentiality in remote worker interviews.	This concern is valid and therefore, it is part of pre-requisites that the auditor should evaluate if the organization has secure and confidential access for interviews. As main audits should always be on-site, this can be checked at that time.
<b>Opposition or Strong Reservations</b>	Responses opposing remote audits or expressing strong reservations, arguing that on-site presence is essential for verifying material flows, assessing labour conditions, preventing manipulation, and maintaining stakeholder trust in the FSC system.	Remote audits are not new concepts in CoC. In the current requirements, sales offices and other low-risk organizations are eligible for remote audits. During Covid, the criteria were expanded and used by certification bodies which is now the basis of this annex and there is no evidence that those audits had lower rigour compared to on-site audits.

## 7.2 Pre-requisites

No.	Question
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**16** To what extent do you agree with defined pre-requisites defined in clause 2.1 & 2.2 of the Annex? Please provide the rationale for your answer

### Overview of results

#### **Summary of the results for Question 16:**

A total of 113 stakeholders participated in this section. Of these, 59% agreed with the pre-requisites defined in clause 2.1 & 2.2, while 8% expressed disagreement and 33% remained neutral.

#### **Key Insights:**

There is general consistency across stakeholders regarding the changes in this section, with the majority expressing support or remaining neutral.

#### **Key feedback from participants for Question 16:**

Comments on this section can be grouped into two main themes. The first relates to technical and structural issues with the pre-requisites, including concerns about vague or contradictory definitions of ICT, as well as issues related to security, data protection, and clarity between clauses 2.1 and 2.4. The second reflects strong agreement from stakeholders who consider the pre-requisites to be appropriate and sufficient.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
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<b>Technical and Structural Issues with Prerequisites</b>	Responses raising technical concerns about ICT definition being vague or contradictory, security and data protection issues, structural clarity problems between clauses and issues with how prerequisites relate to Table 3.	ICT cannot be defined, as technology is evolving in a rapid speed and each country/ region or even company may have different infrastructure. The CBs need to verify if the used technology meets the objectives of the audit or not.
<b>Strong Agreement - Prerequisites are Appropriate</b>	Responses expressing strong agreement that the prerequisites (ICT infrastructure, documentation access, low-risk status, no major NCs) are appropriate, sufficient, and necessary to ensure remote audits maintain the same credibility as on-site evaluations.	No response

### 7.3 List of organizations

No.	Question
17	To what extent do you agree with the list of organizations designated as low-risk in Table 3? In your opinion, what other organizations can be considered low-risk to be eligible for fully remote audit?

#### Overview of results

##### **Summary of the results for Question 17:**

A total of 115 stakeholders participated in this section. Of these, 37% agreed the list of organizations designated as low-risk in table 3 , while 27% expressed disagreement and 37% remained neutral.

##### **Key Insights:**

Responses were almost evenly divided between agreement, disagreement, and neutral opinions. However, a key observation is the significant difference between certification bodies and certificate holders. Certificate holders expressed the highest level of disagreement with the changes, while certification bodies showed comparatively higher levels of agreement with the proposed list.

##### **Key feedback from participants for Question 17:**

The majority of comments strongly emphasized that certificate holder and site-specific performance should be a key criterion for low-risk classification.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Activities for processors can be verified only on-site</b>	Responses indicated the risk for processors that transform mixing and segregation is not required as it needs to be verified on-site	This can be verified through the main (and re-certification evaluations) by the auditors to confirm if in fact the 'processor' is low-risk for remote audits.
<b>Performance-Based Risk Classification</b>	Responses strongly advocating that CH and site-specific performance must be a key criterion for low-risk classification, suggesting that organizations with	Performance is an indicator for remote audits. Pre-requisites require no major NCs in the past 3 years or

	excellent compliance history, zero major NCs, and strong track records should be eligible for remote audits.	no history of False Claims in the certification cycle.
<b>Opposition to Fixed Categories</b>	Responses disagreeing with fixed/static low-risk categories, arguing that risk should be dynamic, re-evaluated annually, and linked to performance rather than organizational type alone, with remote audits used as an incentive for high performance.	Although acknowledging the nature of the concern and the nature of risks being dynamic, having fixed categories and non-fixed criteria could result in different interpretations among different CBs and also ASI.
<b>Expansion of the identified criteria</b>	Responses suggesting that finished products not yet labelled, clearly marked products, packaged products ready for delivery, or products undergoing minor transformation should also be considered low-risk for remote audits.	This proposal is taken into consideration and D2-0 is revised accordingly.
<b>Processors with Low Mixing Risk</b>	Responses suggesting that processors handling exclusively FSC material, using percentage systems without segregation requirements, having simple processing steps, or with fully traceable logistics should be eligible for remote audits despite physical possession.	This scenario is already covered under D1-0.
<b>The requirements add integrity risks</b>	A few responses indicated concerns on integrity risks for allowing remote audits to be conducted	Majority of stakeholders (including the working group) believe this proposal adds value and the proposed conditions cover the integrity aspects.

## 8 Addressing False Claims

### 8.1 Requirements in annex 6 'Addressing False Claims'

No.	Question
18	To what extent do you agree with the requirements in Annex 6 "Addressing False Claims"? Please provide the rationale for your answer

#### Overview of results

##### **Summary of the results for Question 18:**

A total of 106 stakeholders participated in this section. Of these, 42% agreed with the requirements in annex 6 "addressing false claims", while 18% expressed disagreement and 40% remained neutral.

##### **Key Insights:**

Participants generally expressed a consistent opinion on this topic. However, certification bodies and certificate holders were more likely to remain neutral compared to other stakeholder groups.

##### **Key feedback from participants for Question 18:**

Comments can be grouped into two main categories. The first group strongly supports the Annex 6 requirements, viewing them as clear, robust, and necessary, and noting that they improve transparency, consistency, and accountability in handling false claims through structured classification. The second group disagrees with consolidating inaccurate claims into the false claims framework, arguing that this conflates administrative errors with genuine false claims.

Below is the key feedback from participants:

Feedback	Comments	FSC Response
<b>Strong Support - Clarity and Transparency</b>	Responses strongly supporting Annex 6 requirements, viewing them as clear, robust, necessary, and improving transparency, consistency, and accountability in handling false claims through structured classification and mandatory reporting.	No response
<b>Concerns about CB Role in Classification</b>	A few responses expressing concerns that CBs should not be responsible for determining intent or classifying false claims as deliberate, arguing this is beyond their mandate, is legally complex, or that they will default to non-deliberate classifications to avoid liability.	CBs are the first point of contact with the certificate holder and have better understanding of the reality of them so would be a better decision maker on the classification of False Claims. However, as deliberate False Claims have stricter requirements, they need to be evaluated and confirmed by FSC.
<b>Opposition to Removal of 'Inaccurate Claims' Category</b>	Responses disagreeing with consolidating 'inaccurate claims' into the false claims framework, arguing this conflates administrative errors with genuine false claims, discourages transparency, and may increase unnecessary waste of conforming products.	This concern has been considered and addressed in D2-0. Inaccurate claims are now included in the annex and have separate requirements in comparison to False Claims.
<b>Request for Examples and Implementation Guidance</b>	Responses requesting concrete examples distinguishing deliberate from non-deliberate cases, clearer definitions of what constitutes a false claim versus administrative error, and standardized templates to ensure consistent application across CBs.	Additional examples, illustrations and clarifications will be included in the guidance document.

## 8.2 Timeframe for submitting relevant False Claim documents

### No. Question

**19** To what extent do you agree with timeframe for submitting relevant False Claim documents? Please provide the rationale for your answer

### Overview of results

#### Summary of the results for Question 19:

A total of 102 stakeholders participated in this section. Of these, 40% agreed with timeframe for submitting relevant false claim documents, while 16% expressed disagreement and 44% remained neutral.

### Key Insights:

While many participants expressed a neutral opinion on the topic, responses were generally consistent across stakeholder groups.

### Key feedback from participants for Question 19:

Comments on this topic can be grouped into two main categories. The first reflects strong agreement that a 30-day timeframe is appropriate, reasonable, practical, and achievable. The second includes comments arguing that 30 days is too long for serious or deliberate false claims, suggesting a shorter timeline of 10–15 days for high-risk cases.

Below are the key concerns from participants:

Feedback	Comments	FSC Response
<b>Request for Longer Timeline (60-90 Days)</b>	Responses arguing that 30 days is insufficient and requesting extension to 60-90 days, citing the need for thorough investigation, evidence gathering, coordination with external parties, translation requirements, and avoiding incomplete submissions.	False Claim cases are one of the most critical events that may happen with a high integrity impact. Therefore, they require a fast response to eliminated further contamination of the supply chain. Majority of stakeholders (and the working group) agree with keeping the 30-day deadline.
<b>Alignment with Major NC Timelines</b>	Responses requesting that the false claim submission timeline be aligned with Major NCR closure timelines (typically 3 months), allowing organizations adequate time to complete root cause analysis before CB submission.	
<b>Request for Shorter Timeline for High-Risk Cases</b>	Responses arguing that 30 days is too long for serious or deliberate false claims, suggesting shorter timelines (10-15 days) for high-risk cases or immediate preliminary notifications to prevent continued use of FSC claims during investigation.	Acknowledging the concerns of stakeholders, a short deadline may not be realistic due to the complexity of the supplier and customer of some organizations and the process to identify which company has received the actual False Claim material.
<b>Concerns about Starting Point Definition</b>	Responses questioning when the 30-day period should begin, noting that 'sharing the evaluation report' can take months, and suggesting the timeline should start from identification or be independent of report finalization.	Therefore, D2-0 is keeping the 30-day deadline.

## 9 Closing

No.	Question
20	Please briefly explain how the draft can be made clearer or better structured,
21	Please share any additional comments. Please refer to the section in the document your comment relates to

### Overview of results for Q20

### Overview of results for Q21

Below is the key feedback from participants which have been addressed in the relevant sections of both chain of custody drafts:

Type of Comment	Suggestions
<b>Document Structure and Organization</b>	Comments related to the overall structure, organization, and navigation of the standard document. This includes suggestions for better section ordering, cross-referencing, separation of normative vs guidance content, and overall document architecture.
<b>Simplification and Clarity</b>	Feedback emphasizing the need to simplify the standard, reduce complexity, remove unnecessary requirements, and make the document more accessible and understandable. Includes concerns about document length and over-regulation.
<b>Visual Aids and Supporting Materials</b>	Suggestions for incorporating more visual elements such as diagrams, flowcharts, matrices, examples, case studies, and decision trees to improve comprehension and consistent interpretation across stakeholders.
<b>Integration and Consolidation Issues</b>	Comments on the merging of multiple standards (40-004, 40-007, 40-003) and integration of advice notes and interpretations. Mixed feedback from stakeholders, many were in favour of reduced standards and some shared concerns about whether consolidation has made the document clearer or more complex.
<b>Language and Translation</b>	Feedback on language clarity, terminology consistency, translation quality, and accessibility for non-English speakers. Includes suggestions for using simpler language and improving linguistic precision.
<b>Highlighting Changes and Consultation Process</b>	Comments about the difficulty in identifying changes from previous versions, the need for better change tracking, and issues with the consultation process itself including timing and availability of supporting documents.
<b>Scope and Applicability</b>	Feedback on topics that should or should not be included in the CoC standard, such as leasing, take-back, circularity, CLR placement, and making the standard more modular or targeted to specific business types.
<b>Risk-Based Approach and Implementation</b>	Comments on implementing and enhancing risk-based approaches throughout the standard, including differentiation based on jurisdiction, performance, and risk levels, and allowing more flexibility for low-risk contexts. Additionally, consistent application of risk-based approaches throughout the standard, ability to adapt risk classifications based on certificate holder performance, and recognition of low-risk contexts and strong regulatory frameworks.
<b>Overall Positive Acknowledgment and Improvements</b>	Comments that acknowledge the substantial work done by FSC and recognize meaningful improvements in the draft, particularly regarding scope of activities, risk-based approaches, cross-site credit systems, and consolidation efforts.
<b>Simplification and Reduction of Requirements</b>	Feedback emphasizing the need for further simplification, streamlining, and ensuring only minimum necessary requirements are included. Concerns about excessive complexity, bureaucracy, and administrative burden.

<b>Core Labour Requirements (CLR) Concerns</b>	Comments specifically addressing issues with Core Labour Requirements implementation, including workplace access rights, OHAS representatives, verification schemes, legal conflicts, and proportionality in low-risk jurisdictions with strong legal frameworks.
<b>Outsourcing Requirements</b>	Feedback on outsourcing provisions, including calls for more reasonable, functional, and risk-based requirements that reflect practical realities, different operational models, and avoid unnecessary administrative burden.
<b>Multi-site and Group Certification</b>	Feedback on reasonable and just assignment of consequences within multi-sites and groups, internal audit requirements, sampling approaches, and certification structure including CAR closure timelines.
<b>Circular Economy and Reclaimed Materials</b>	Comments supporting integration of circular economy principles, pre-consumer and post-consumer reclaimed wood, take-back and leasing provisions, and concerns about material traceability and definitions in circular contexts.



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