



Draft Supplementary Document

FSC CLR RISK MATRIX (DRAFT)

Supporting reference document on the draft proposal for the
'FSC CLR Risk Matrix' referenced in FSC-STD-40-004 V4-0
D2-0 and FSC-STD-20-011 V4-4 D2-0



Title: FSC CLR Risk Matrix (Draft)

Contact for comments: FSC International – Policy and Performance Unit
Adenauerallee 134
53113 Bonn
Germany

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

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

Email: policy_performance@fsc.org

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INTRODUCTION

This document acts as a supporting document for the public consultation of the proposed 'FSC CLR Risk Matrix' referenced within the drafts FSC-STD-40-004 V4-0 D2-0 and FSC-STD-20-011 V4-4 D2-0. This matrix supports a risk-based approach to the evaluation of the FSC core labour requirements (FSC CLR), which are currently provided in Section 14 of FSC-STD-20-011 V4-3, with the revised proposals provided in Section 14 and referenced in Section 12 of FSC-STD-20-011 V4-4 D2-0, with additional reference in the certification requirements (FSC-STD-40-004 V4-0 D2-0).

This document provides a summary of the revised methodology behind the matrix (see [Methodology](#)) and the matrix itself (see Section 3), which includes a list of 206 countries in the form of a table, providing a risk classification for each FSC CLR: child labour, forced labour, discrimination, and freedom of association.

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1. Changes since Draft 1 (D1-0)

Since the consultation of D1-0, the initially proposed matrix has been reviewed and revised in order to address stakeholder comments, that primarily suggested closer use of the existing risk assessments for FSC, namely related to FSC Controlled Wood. Comments also requested full visibility of the matrix, which is therefore provided in Section 3.

Based on these comments, as well as internal discussion, FSC propose to adopt the following approach:

1. Where there exists a risk assessment for a country or territory, this is used to determine the FSC CLR Risk classification for the FSC CLR Risk Matrix.
2. Where a country or territory does not have an existing risk assessment, the classification is based on the international, publicly available sources provided in [Background Data Sources](#).

Applying this approach, the matrix was revised, with checks on the available sources to ensure the most up-to-date versions are referenced. More detail is provided in [Section 2](#) of this document.

It is proposed that the overall FSC CLR Risk Matrix would be provided as one (1) list, for reference by stakeholders, especially by certification bodies for their evaluation, as provided in the proposed revised drafts (Section 8 and 13 of FSC-STD-40-004 V4-0 D2-0 and Section 12 and 14 of FSC-STD-20-011 V4-4 D2-0).

The FSC Secretariat request stakeholders to share their views on this proposal by answering the relevant questions concerning the FSC CLR Risk Matrix made available on the [FSC Consultation Platform](#), open from 15 May 2026 until 15 June 2026. Further to the questions provided in the consultation, stakeholders can contact the FSC Chain of Custody and Controlled Wood team by email with any relevant enquiry (chainofcustody@fsc.org).

2. Summary and Methodology

Summary

This matrix provides a classification per country or territory as 'low' or 'high' for each FSC CLR. Alongside reference to existing FSC risk assessments, five (5) external publicly available data sources were used to create this matrix to cover the rights linked to the FSC CLR: forced labour, child labour, discrimination and freedom of association and collective bargaining. The assessment and allocation of saliency level is only general and not related to any performance level of any FSC-certified Organizations in a country or territory, and it does not specify any industry or worker-type. This means the classification rating provided is applicable to all workers, as defined the FSC Chain of Custody Requirements.

This matrix is proposed to provide a more simplified approach to how certified Organizations and uncertified contractors (with an outsourcing agreement) are evaluated for conformity to the FSC CLR within the FSC Chain of Custody Standards, as provided in the draft requirements in FSC-STD-20-011 V4-4 D2-0 (Sections 12 and 14).

Methodology

Reputable publicly available reports and data sets were identified for each indicator (FSC CLR), reviewed, and allocated a classification of 'low' or 'high'. For example, for the results that rank countries by percentage or numerically, these were split into two (2) percentiles, with an allocation of 'low' or 'high'. This approach follows previous allocation of 'low risk' or 'high risk', such as for the evaluation of outsourcing agreements in Section 12 of [FSC-STD-20-011 V4-3](#), which provided for a 'high risk' classification for outsourcing activities in other countries where the Transparency International Corruption Perception Index (CPI) is 'lower than 50' (Clause 12.2 e)).

The final classification for each FSC CLR per country is based on the combination of the sources; where more than one data source is used for the indicator, the higher classification was assigned e.g., if one is 'high' and the other 'low', or where there is missing information for one, the 'high' rating is assigned overall for that FSC CLR.

For countries that do not have data for one or more of the FSC CLR, the absence of data results in the assignation of a 'high' classification.

Background Data Sources

FSC CLR Classification for countries with existing assessments

For the countries with existing FSC Controlled Wood Risk Assessments, either based on the older FSC-PRO-60-002a V3-0 FSC National Risk Assessment Framework (available [here](#)) or the newer FSC-PRO-60-006b V2-0 Risk Assessment Framework (available [here](#)), the risk conclusion has been reviewed and transposed into the FSC CLR Risk Matrix for the 58 relevant countries¹, with acknowledgement that this conclusion is based on a somewhat different scope.

- **For countries with existing Controlled Wood Risk Assessments (FSC-PRO-60-002a)**
 - 'Low risk' rating under Indicator 2.2 is equivalent to 'Low' for all FSC CLR.

¹ Some countries have been excluded from the FSC CLR Risk Matrix, due to withdrawal from the country i.e., Russia and Belarus.

- 'Differentiated' has been checked to understand which aspects are not considered low risk. Due to the general application of the FSC CLR risk matrix, where there is an aspect considered as 'specified risk' for a certain industry or worker type, a 'High' classification is applied.
- 'Specified' is equivalent to 'High' for all FSC CLR.

- **For countries with new Risk Assessments (FSC-PRO-60-006b V2-0)**

- Negligible is equivalent to 'Low'
- Non-negligible is equivalent to 'High'

To align with the risk assessment indicators with the FSC CLR, we reference the indicators provided in Table 1 below.

If countries had differing conclusions for one of two indicators for a relevant FSC CLR, the higher conclusion would be taken e.g., Low and High would result in 'High'.

Indicator	Indicator Text	Relevant FSC CLR
27	Legal requirements related to child labour and employment of young workers are complied with.	Child Labour
28	Child labour is not present, and the employment of young workers is responsibly managed, including related rights as specified in the ILO Fundamental Principles and Rights at Work.	Child Labour
29	Legal requirements related to modern slavery, including forced and compulsory labour, are complied with.	Forced Labour
30	Modern slavery, including forced and compulsory labour are not used, promoted, or supported in any way, including as specified in the ILO Fundamental Principles and Rights at Work.	Forced Labour
31	Legal requirements related to the Freedom of Association, the Right to Organise and the Right to Collective Bargaining are complied with.	Freedom of Association
32	Labour rights related to the Freedom of Association, the Right to Organise and the Right to Collective Bargaining are respected, including as specified in the ILO Fundamental Principles and Rights at Work.	Freedom of Association
38	Legal requirements related to discrimination against workers are complied with.	Discrimination
39	There is no discrimination against workers in processes related to hiring, remuneration and access to training, promotion, termination, or retirement, including related rights as specified in the ILO Fundamental Principles and Rights at Work.	Discrimination

Table 1 Relevant indicators from FSC-PRO-60-006b V2-0

FSC CLR Classification for countries without an existing assessment

The classification in the FSC CLR Risk Matrix is provided for each FSC CLR is based on the following sources for countries that do not have a relevant FSC risk assessment.

Child Labour

- **‘Percentage of children aged 5-17 years engaged in child labour’**
This main source of the information provided in this dataset from UNICEF is collected through questionnaires, providing a percentage per country/territory.

Forced Labour

- **Trafficking in Persons Report (2025)**
This annual report provides a ranking of 188 countries based on compliance with US standards, based on perceived effort to acknowledge and combat human trafficking. These tiers range from Tier 1 to Tier 3, and an additional category of ‘Special cases’. Tier 1 indicates countries that meet the US requirements, whereas Tier 3 indicates countries whose governments do not fully meet the requirements, without sufficient efforts to meet them.
- **Global Slavery Index (2023)**
This provides a report from the Walk Free Foundation which is based on national estimates of modern slavery for 160 countries. This referenced information is the vulnerability score, provided as a percentage (0-100%) per country.

Discrimination

- **WJP Rule of Law Index: Equal treatment and absence of discrimination (2013-2024)**
This data set from the World Bank Group provides a score for 142 different economies, with one (1) signifying the highest score, and zero (0) the lowest score. The scores closer to 1 signify economies considered having more equal treatment and absence of discrimination.

Freedom of Association and Collective Bargaining

- **ITUC Global Rights Index (2025)**
This index provides the results of an annual study on workers’ rights violations, with a rating system of 1 to 5+, with 5+ indicative of, ‘No guarantee of rights due to the breakdown in rule of law’.

For more information on the sources of the datasets and reports referenced, see [Source References](#) for website links.

Source References

FSC Controlled Wood Risk Assessment Dashboard, Forest Stewardship Council, Accessed on 08/10/2025. Retrieved from: <https://connect.fsc.org/fsc-risk-assessments#dashboard-on-existing-cwra>

Global Rights Index 2025, International Trade Union Confederation, Accessed on 23/05/2025. Retrieved from: <https://www.ituc-csi.org/global-rights-index-2025> .

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“Percentage of children aged 5-17 years engaged in child labour” dataset, UNICEF, Accessed on 01/06/2025. Retrieved from: <https://data.unicef.org/topic/child-protection/child-labour/>

“2025 Trafficking in Persons Report”, United States Department of State. Accessed on 06/03/2026. Retrieved from: <https://www.state.gov/reports/2025-trafficking-in-persons-report/>.

WJP Rule of Law Index 2024, Equal treatment and absence of discrimination, World Justice Project. Retrieved from: https://data360.worldbank.org/en/indicator/WJP_ROL_4_1

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3. FSC CLR Risk Matrix (Table)

This table provides classifications for 206 countries/territories, with clear indication on whether the classification is sourced from an FSC risk assessment or not, indicated in column 2 with the hyperlink to [FSC Document Centre](#) provided.

Country/Territory	Available CWRA or Risk Assessment	Child Labour	Forced Labour	Discrimination	Freedom of Association
Afghanistan	No	High	High	High	High
Albania	No	Low	Low	High	High
Algeria	No	Low	Low	Low	High
American Samoa	No	High	High	High	High
Andorra	No	High	High	High	High
Anguilla	No	High	High	High	High
Angola	No	High	High	High	High
Antigua and Barbuda	No	High	High	Low	High
Argentina	Yes	High	High	High	High
Armenia	No	Low	High	High	High
Aruba	No	High	High	High	High
Australia	Yes	Low	Low	Low	Low
Austria	Yes	Low	Low	Low	Low
Azerbaijan	No	Low	High	High	Low
Bahamas, The	No	High	High	High	High
Bahrain	No	High	Low	High	High
Bangladesh	No	High	High	High	High
Barbados	No	Low	High	Low	High
Belgium	Yes	Low	Low	Low	Low
Belize	No	Low	High	High	High
Benin	No	High	High	Low	High
Bhutan	No	Low	High	High	High
Bolivia	Yes	High	High	High	High

Country/Territory	Available CWRA or Risk Assessment	Child Labour	Forced Labour	Discrimination	Freedom of Association
Bosnia and Herzegovina	No	High	Low	High	High
Botswana	No	High	Low	Low	High
Brazil	<u>Yes</u>	High	High	High	High
Brunei Darussalam	No	High	High	High	High
Bulgaria	<u>Yes</u>	High	High	High	High
Burkina Faso	No	High	High	Low	High
Burundi	No	High	High	High	High
Cambodia	No	High	High	High	High
Cameroon	No	High	High	High	High
Canada	<u>Yes</u>	Low	Low	Low	Low
Cape Verde	No	High	High	High	High
Cayman Islands	No	High	High	High	High
Central African Republic	No	High	High	High	High
Chad	No	High	High	High	High
Chile	<u>Yes</u>	Low	Low	Low	Low
China	<u>Yes</u>	High	High	High	High
Colombia	<u>Yes</u>	High	High	High	High
Comoros	No	Low	High	High	High
Congo, Dem. Rep.	No	High	High	High	High
Congo, Rep.	No	High	High	High	High
Cook Islands	No	High	High	High	High
Costa Rica	No	Low	Low	Low	High
Croatia	<u>Yes</u>	Low	Low	Low	Low
Cuba	No	High	High	High	Low
Cyprus	No	High	High	Low	High
Czech Republic	<u>Yes</u>	Low	Low	Low	Low
Côte d'Ivoire	No	High	High	Low	Low
Denmark	<u>Yes</u>	Low	Low	Low	Low
Djibouti	No	High	High	High	Low

Country/Territory	Available CWRA or Risk Assessment	Child Labour	Forced Labour	Discrimination	Freedom of Association
Dominica	No	High	High	Low	High
Dominican Republic	No	Low	Low	High	High
Ecuador	<u>Yes</u>	High	High	High	High
Egypt, Arab Rep.	No	High	High	High	High
El Salvador	No	Low	High	High	High
Equatorial Guinea	No	High	High	High	High
Eritrea	No	High	High	High	High
Estonia	<u>Yes</u>	High	High	High	High
Eswatini	<u>Yes</u>	High	High	High	High
Ethiopia	No	High	High	High	High
Fiji	No	High	High	High	High
Finland	<u>Yes</u>	Low	Low	Low	Low
France	<u>Yes</u>	Low	Low	Low	Low
French Guiana	No	High	High	High	Low
Gabon	No	Low	High	High	High
Gambia, The	No	High	High	High	High
Georgia	<u>Yes</u>	High	Low	High	High
Germany	<u>Yes</u>	Low	Low	Low	Low
Ghana	No	Low	Low	Low	Low
Greece	No	High	Low	High	Low
Greenland	No	High	High	High	High
Grenada	No	High	High	Low	High
Guam	No	High	High	High	High
Guatemala	<u>Yes</u>	High	High	High	High
Guinea	No	High	High	High	High
Guinea-Bissau	No	High	High	High	High
Guyana	No	Low	Low	High	High
Haiti	No	High	High	High	High
Honduras	<u>Yes</u>	High	High	High	High

Country/Territory	Available CWRA or Risk Assessment	Child Labour	Forced Labour	Discrimination	Freedom of Association
Hong Kong SAR, China	No	High	Low	Low	High
Hungary	<u>Yes</u>	Low	Low	Low	Low
Iceland	No	High	High	High	High
India	<u>Yes</u>	High	High	High	High
Indonesia	<u>Yes</u>	High	Low	High	High
Iran, Islamic Rep.	No	High	High	High	High
Iraq	No	Low	High	High	High
Ireland	<u>Yes</u>	Low	Low	Low	Low
Israel	No	High	Low	High	Low
Italy	<u>Yes</u>	Low	Low	Low	Low
Jamaica	No	Low	Low	Low	Low
Japan	<u>Yes</u>	Low	Low	Low	Low
Jersey, Channel Islands	No	High	High	High	Low
Jordan	No	Low	High	Low	High
Kazakhstan	No	High	Low	Low	High
Kenya	No	Low	High	High	High
Kiribati	No	High	High	High	High
Korea, Dem. Rep.	No	Low	High	High	High
Korea, Rep.	<u>Yes</u>	Low	High	High	High
Kosovo	No	Low	Low	Low	High
Kuwait	No	High	Low	High	High
Kyrgyz Republic	No	High	High	High	High
Lao PDR	<u>Yes</u>	High	Low	High	High
Latvia	<u>Yes</u>	Low	Low	Low	Low
Lebanon	No	High	High	High	Low
Lesotho	No	High	High	High	High
Liberia	No	High	High	High	High
Libya	No	High	High	High	High
Liechtenstein	No	High	High	High	High

Country/Territory	Available CWRA or Risk Assessment	Child Labour	Forced Labour	Discrimination	Freedom of Association
Lithuania	<u>Yes</u>	Low	Low	Low	Low
Luxembourg	<u>Yes</u>	Low	Low	Low	Low
Macao SAR, China	No	High	High	High	High
Madagascar	No	High	High	Low	High
Malawi	No	High	High	High	High
Malaysia	<u>Yes</u>	High	High	High	High
Maldives	No	High	High	High	High
Mali	No	High	High	High	High
Malta	No	High	High	Low	High
Marshall Islands	No	High	High	High	High
Mauritania	No	Low	High	High	High
Mauritius	No	High	Low	Low	High
Mexico	<u>Yes</u>	High	High	High	High
Micronesia, Fed. Sts.	No	High	High	High	High
Moldova	No	High	Low	Low	High
Monaco	No	High	High	High	Low
Mongolia	No	Low	High	High	High
Montenegro	No	High	High	Low	High
Morocco	No	High	Low	Low	High
Mozambique	No	High	High	High	High
Myanmar	<u>Yes</u>	High	High	High	High
Namibia	No	High	High	High	High
Nauru	No	Low	High	High	High
Nepal	No	High	High	High	High
Netherlands	<u>Yes</u>	Low	Low	Low	Low
New Zealand	<u>Yes</u>	Low	Low	Low	Low
Nicaragua	No	High	High	High	Low
Niger	No	High	High	High	High
Nigeria	No	High	High	High	High

Country/Territory	Available CWRA or Risk Assessment	Child Labour	Forced Labour	Discrimination	Freedom of Association
North Macedonia	No	Low	Low	Low	High
Norway	<u>Yes</u>	Low	Low	Low	Low
Oman	No	High	Low	High	Low
Pakistan	No	Low	High	High	High
Palau	No	High	High	High	High
Panama	No	Low	Low	High	High
Papua New Guinea	<u>Yes</u>	High	High	High	High
Paraguay	No	Low	High	High	High
Peru	<u>Yes</u>	High	High	Low	High
Philippines	No	Low	High	High	High
Poland	<u>Yes</u>	Low	Low	Low	High
Portugal	<u>Yes</u>	Low	Low	Low	Low
Puerto Rico	No	High	High	High	High
Qatar	No	High	Low	High	High
Romania	<u>Yes</u>	Low	Low	Low	Low
Rwanda	No	Low	High	Low	High
Samoa	No	Low	High	High	High
San Marino	No	High	High	High	High
Saudi Arabia	No	High	High	High	High
Senegal	No	High	High	Low	High
Serbia	No	High	Low	Low	High
Seychelles	No	High	High	High	High
Sierra Leone	No	High	High	High	High
Singapore	No	High	Low	Low	High
Slovak Republic	<u>Yes</u>	Low	Low	High	Low
Slovenia	<u>Yes</u>	Low	Low	Low	Low
Solomon Islands	No	High	High	High	High
Somalia	No	High	High	High	High
South Africa	<u>Yes</u>	Low	Low	Low	Low

Country/Territory	Available CWRA or Risk Assessment	Child Labour	Forced Labour	Discrimination	Freedom of Association
South Sudan	No	High	High	High	High
Spain	<u>Yes</u>	Low	Low	Low	Low
Sri Lanka	No	Low	High	High	Low
St. Kitts and Nevis	No	High	High	Low	High
St. Lucia	No	High	High	Low	High
St. Vincent and the Grenadines	No	High	High	Low	High
Sudan	No	High	High	High	High
Suriname	No	Low	High	High	High
Sweden	<u>Yes</u>	Low	Low	Low	Low
Switzerland	<u>Yes</u>	Low	Low	Low	Low
Syrian Arab Republic	No	High	High	High	High
São Tomé and Príncipe	No	High	High	High	High
Taiwan, China	No	High	Low	High	High
Tajikistan	No	High	High	High	High
Tanzania	No	High	High	High	High
Thailand	<u>Yes</u>	High	High	High	High
Timor-Leste	No	Low	High	High	High
Togo	No	High	High	High	High
Tonga	No	High	High	High	High
Trinidad and Tobago	No	Low	Low	Low	High
Tunisia	No	Low	High	High	High
Turkmenistan	No	Low	High	High	High
Tuvalu	No	Low	High	High	High
Türkiye	<u>Yes</u>	Low	Low	High	High
Uganda	No	High	High	High	High
Ukraine	<u>Yes</u>	Low	Low	Low	High
United Arab Emirates	No	High	Low	Low	High
United Kingdom	<u>Yes</u>	Low	Low	Low	Low

Country/Territory	Available CWRA or Risk Assessment	Child Labour	Forced Labour	Discrimination	Freedom of Association
United States	<u>Yes</u>	Low	Low	Low	Low
Uruguay	<u>Yes</u>	Low	Low	Low	Low
Uzbekistan	No	High	High	Low	Low
Vanuatu	No	High	High	High	High
Venezuela, RB	No	High	High	High	High
Viet Nam	<u>Yes</u>	High	High	High	High
West Bank and Gaza	No	Low	High	High	High
Yemen, Rep.	No	High	High	High	High
Zambia	No	Low	High	High	High
Zimbabwe	No	High	High	High	High

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FSC International – Policy and Performance Unit

Adenauerallee 134

53113 Bonn

Germany

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

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

Email: policy_performance@fsc.org