

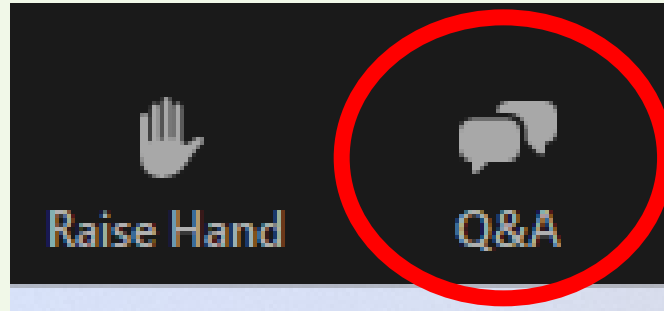
# Supporting Webinar for Consultation

on 2<sup>nd</sup> draft of revised  
CoC standards

Tuesday 19 May 2026 16:00 – 17:30 CET

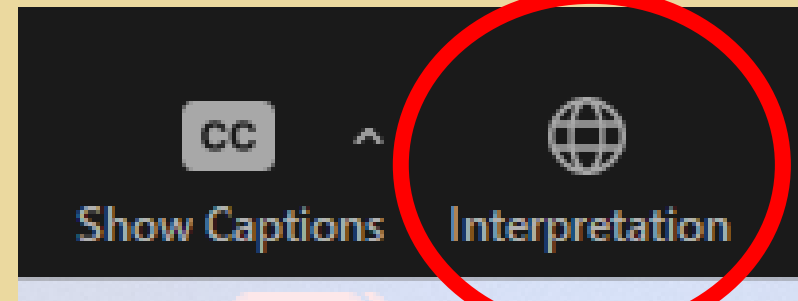
# Webinar participation

Use the Q&A function for questions:



You can like (👍) a question submitted by another participant

Choose your preferred language:



# Housekeeping rules:



Please use Q&A option to ask your questions **anonymously**. Chat function is disabled



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



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

# Important dates



## 3RD CONSULTATION

Open from 15 MAY to  
15 JUNE 2026

## PUBLIC WEBINAR

19 MAY (16:00 –  
17:30 CET)

## Q&A SESSION

2 JUNE (09:00 –10:00  
CET)

# AGENDA



## Topic

- 1 Process updates and timeline
- 2 Main chain of custody standard
- 3 Workers' rights
- 4 Circularity & sourcing reclaimed material
- 5 Group & multisite requirements
- 6 Accreditation standard
- 7 Q&A

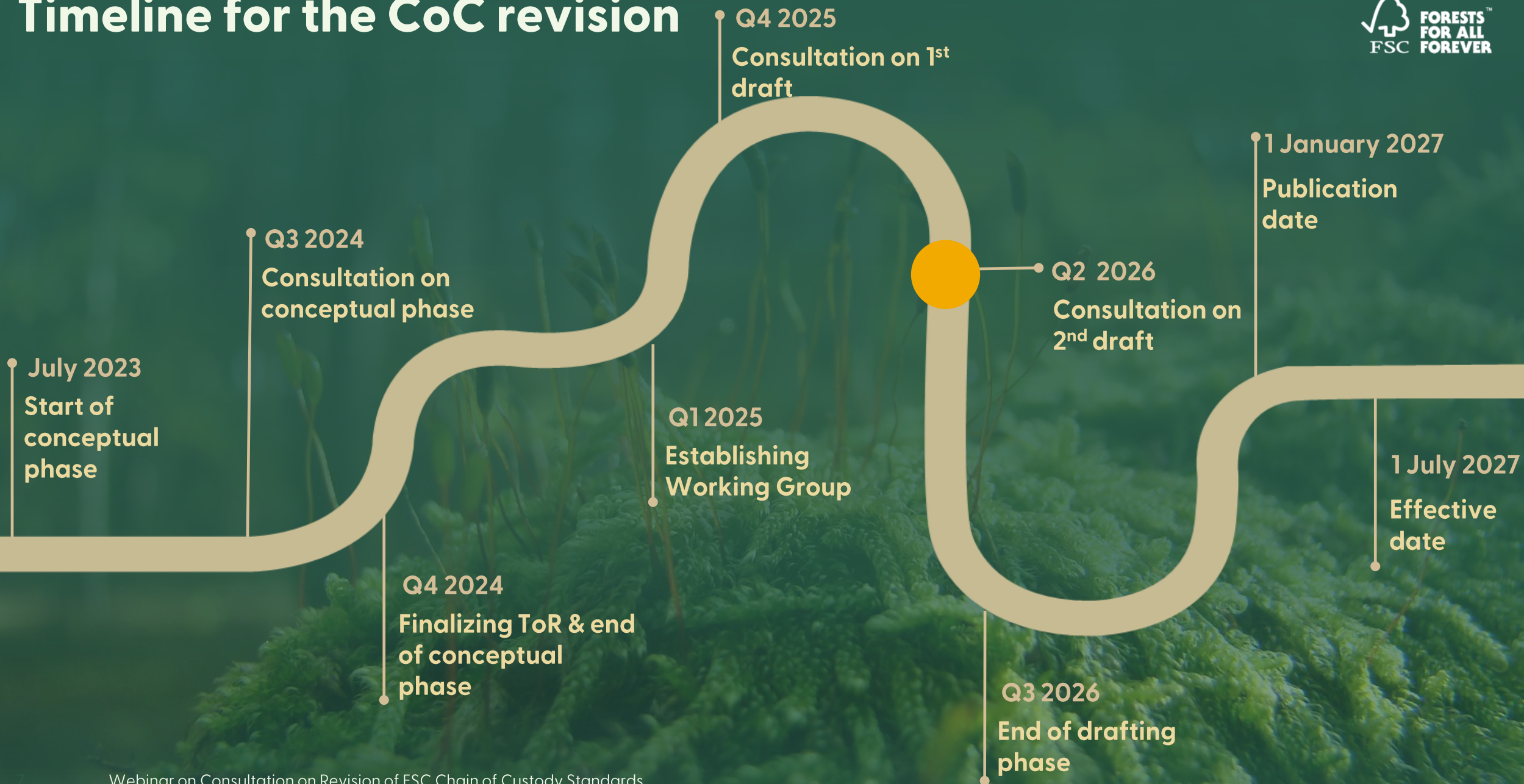
# Process updates and timeline



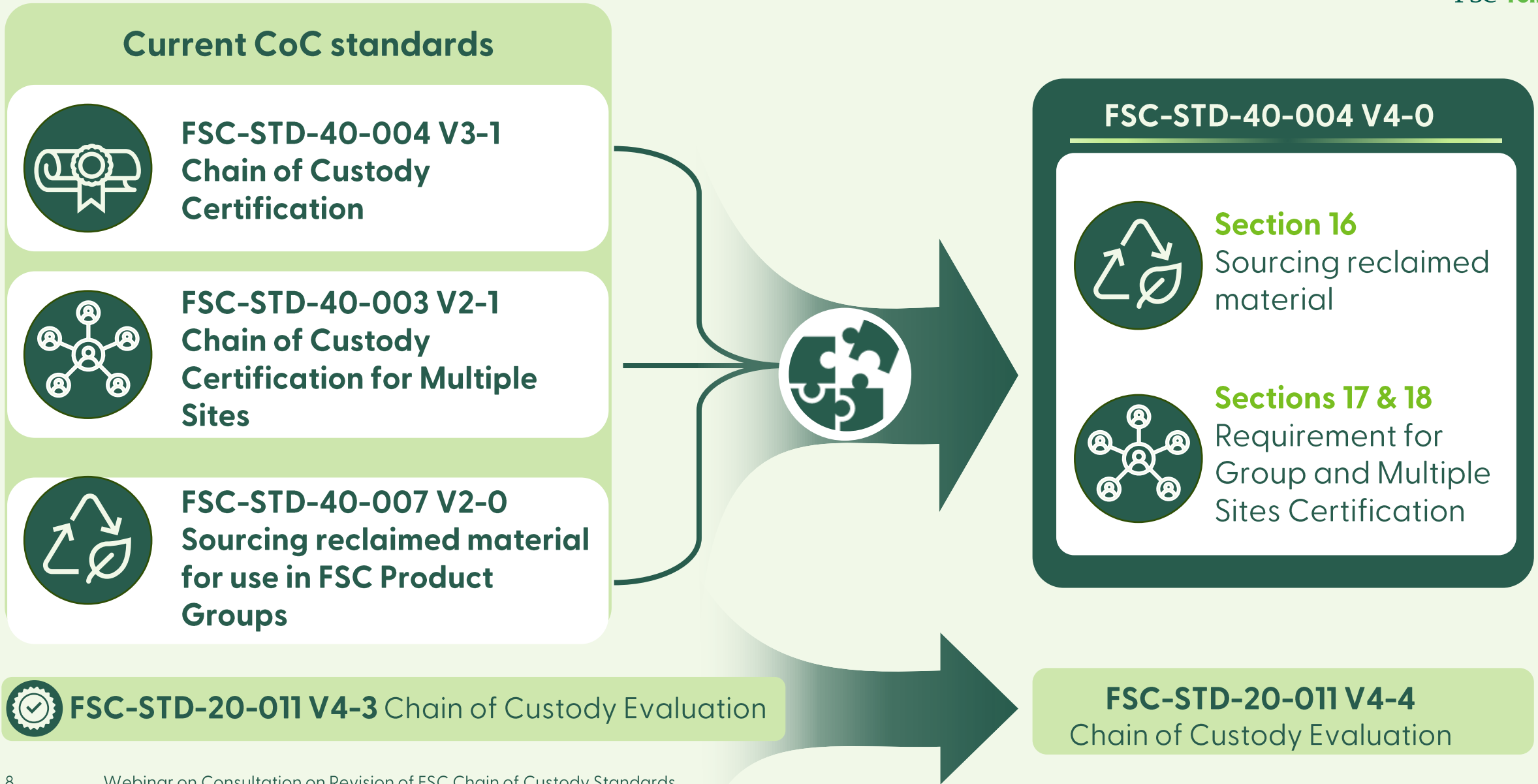
Chain of Custody Standards



# Timeline for the CoC revision



# Integration of CoC standards

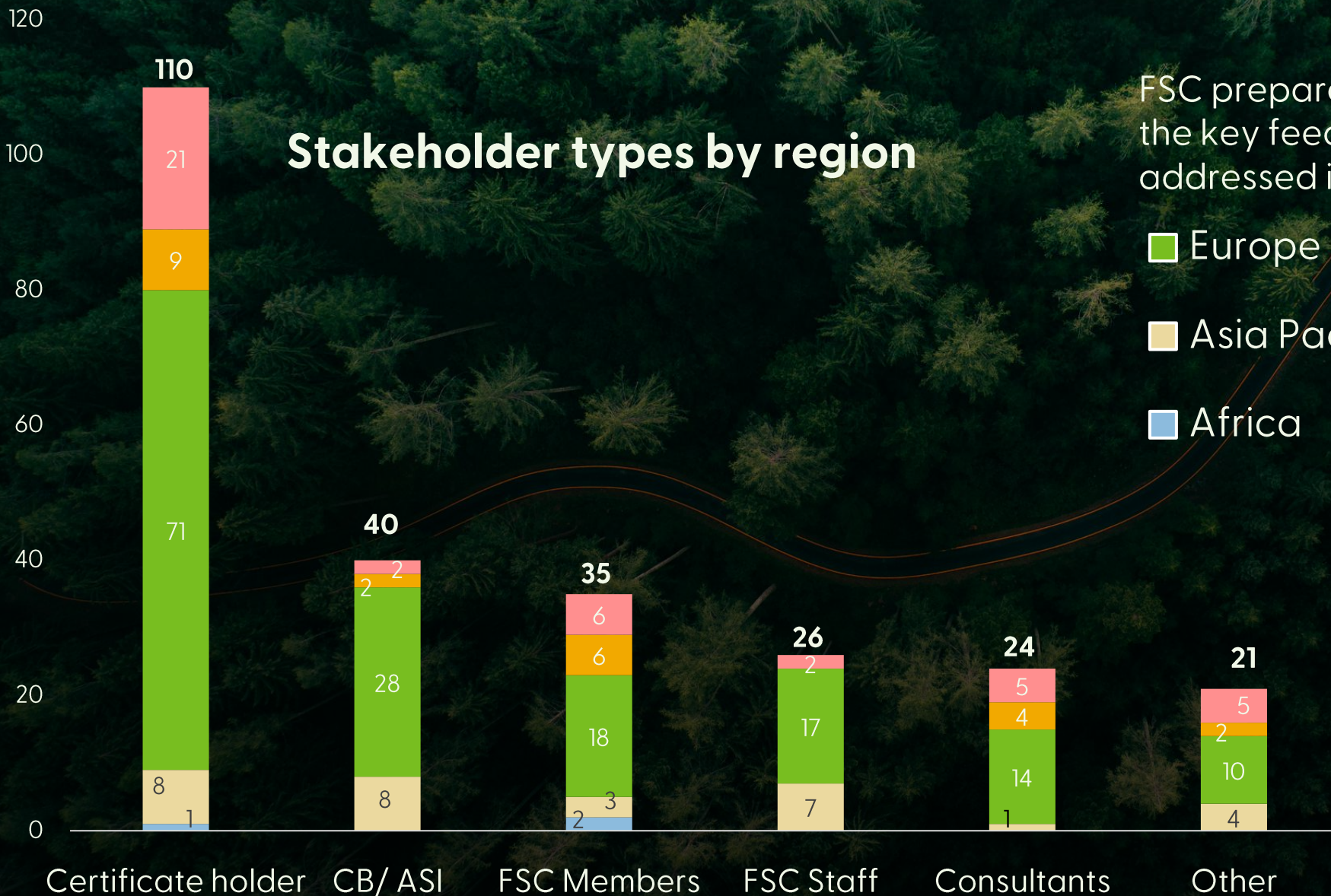


# Stakeholder Participation on D1-0

## 257 stakeholders, +12k comments received

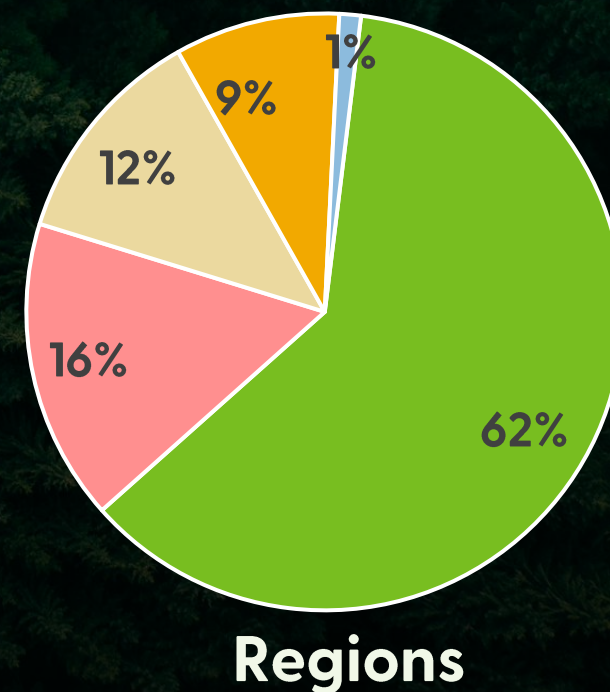


### Stakeholder types by region



FSC prepared consultation report including the key feedback and how they have been addressed in D2-0

- Europe
- North America
- Asia Pacific
- Latin America
- Africa



### Regions

# Main chain of custody standard



Chain of Custody Standard





# FSC CLAIMS

# FSC Claims

## FSC CFM & FSC CW

**CFM** {

- 70% claim contribution
- Eligible to carry 'FSC Mix' label


**Sales restrictions removed**  
**CFM & CW** can be sold to certified and non-certified organizations as raw or finished product



**Controlled Wood** code is proposed to be removed

## FSC Pre-consumer

**FSC claim for eligible pre-consumer recovered from processing**  
 (Certified and controlled inputs)



**FSC Pre-consumer credit/x%**

**Purpose of claim**  
 Remove limitation in V3-1 by allowing eligible production residue to retain claim as eligible input for FSC Recycled products.

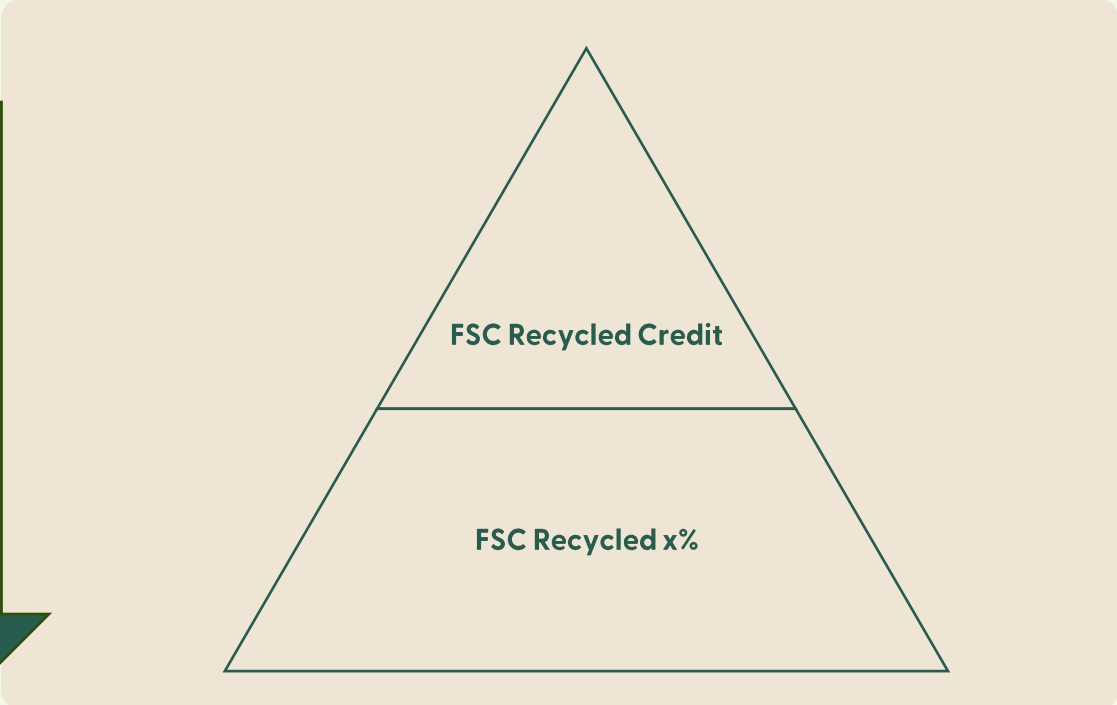
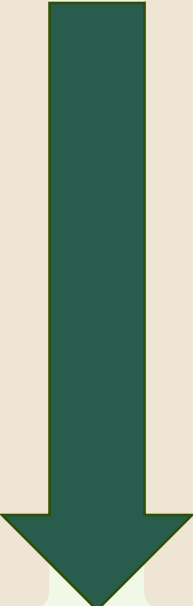
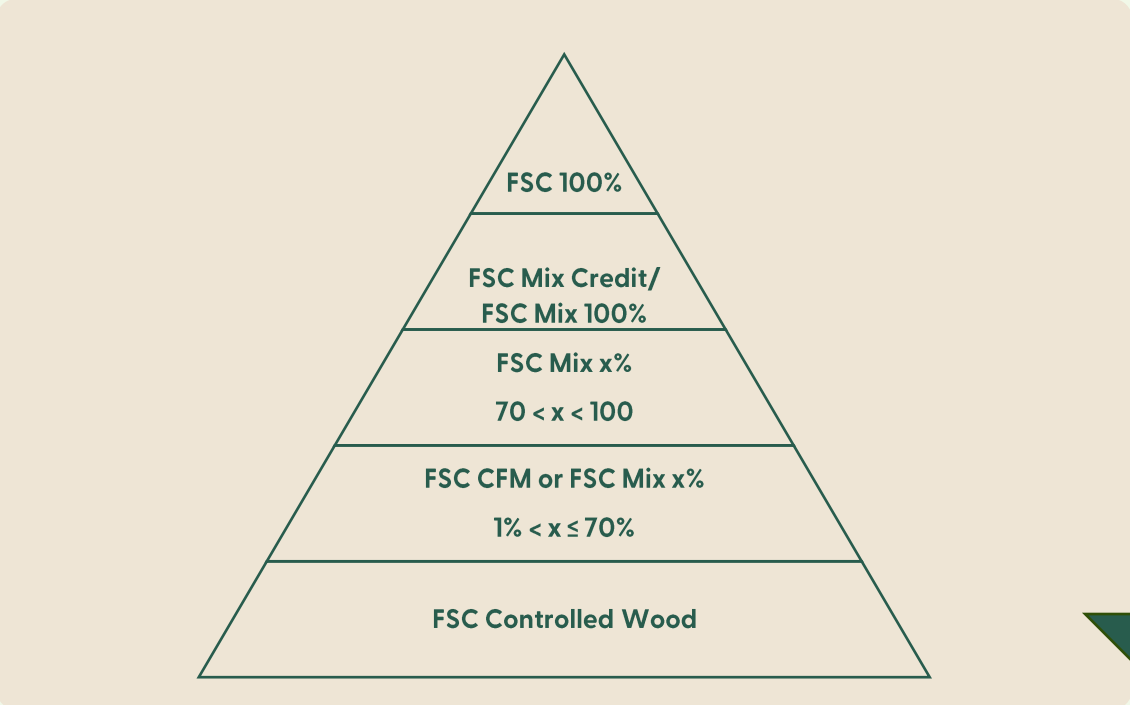
**Simplified Sourcing**  
 sourcing reclaimed materials requirements are not applicable to FSC Pre-consumer claim.

## FSC Ecosystem Services Claims

**D2-0 included the ES Claims as 'add-on' claims for CoC CH to pass**

# Downgrading options

## Proposed changes to clause 2.7



# **OUTSOURCING/ SERVICE PROVIDERS**

# Outsourcing

## Section 13 of FSC-STD-40-004

### CLEARER REQUIREMENTS FOR:



#### Non-certified contractors

- Shall accept to be audited by the CB, for up to one year after termination of contract

### RULES FOR:



#### Regulation of further outsourcing

Only to be permitted:

- to certified contractors; or
- with tri-party agreement **(or similar mechanisms)** between CH, contractor + subcontractor

### NEW SECTION 14 FOR:



#### CH Service Providers

NOTE: Logging and harvesting will only be included in CoC outsourcing agreement if the legal ownership of the material is changed to the CoC certificate holder before the materials are harvested from the management unit.

# Outsourcing

## Proposed changes to FSC-STD-20-011 Section 12

### High Risk Contractors (risk of mixing)

-  Entire manufacturing process of a product
-  Mixes input materials  
e.g., FSC 100% mixed with FSC Controlled Wood
-  Applies the FSC label

### High Risk Contractors (CLR)

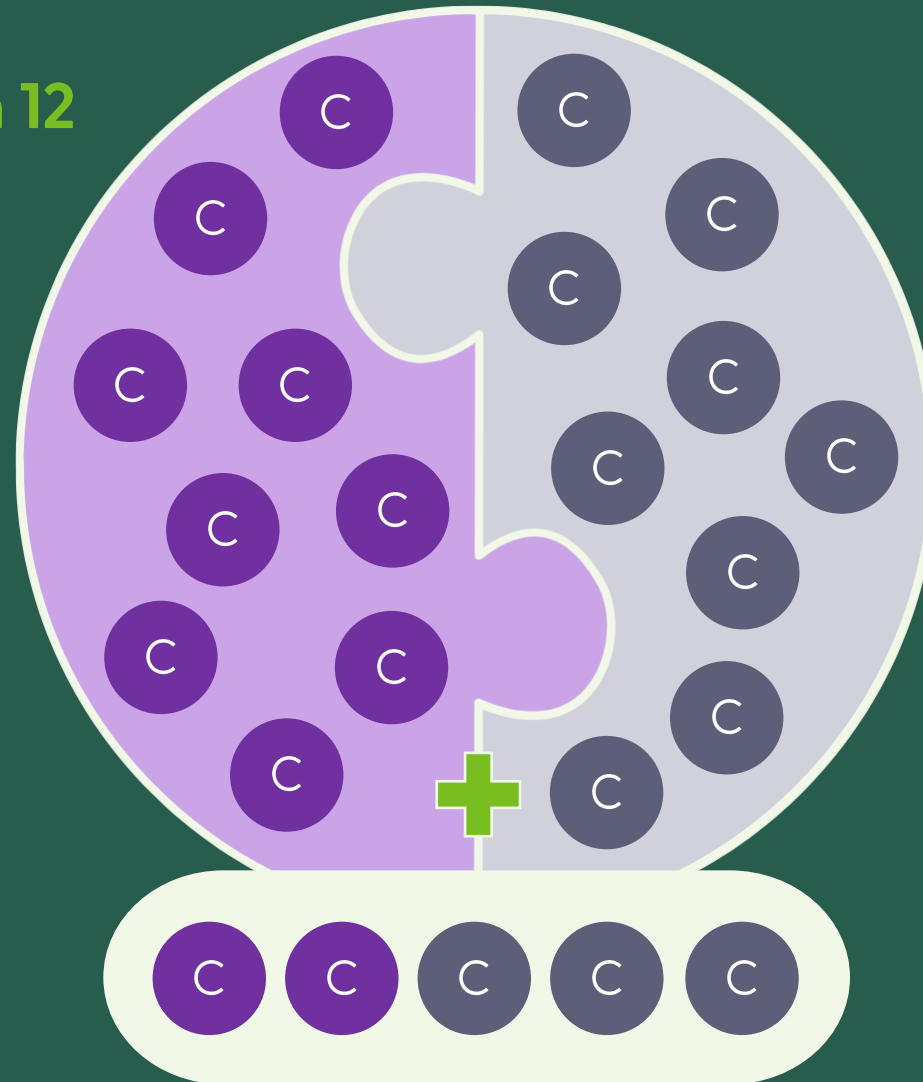
-  Substantiated concerns regarding conformity with CLR
-  High-risk supply chain/country for FSC CLR (integrity)
-  High-risk FSC CLR on FSC CLR Risk Matrix and neither apply:
  - 1) No major CLR NCs in last 5 years;
  - OR
  - 2) 2nd/3rd party audit covering FSC CLR.



# Evaluation of high-risk contractors

## Proposed changes to FSC-STD-20-011 Section 12

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



**HIGH-RISK  
BASED ON CLR**

# FSC INTEGRITY AND TRACEABILITY

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**FSC-STD-40-004**

Clause 1.6

# FSC Integrity and Traceability



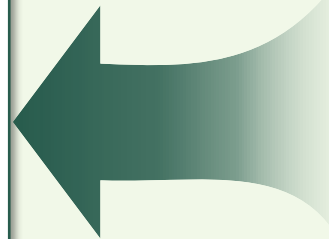
Integrity of FSC COC certification is a key priority of this revision

Traceability is **mandatory** for organizations operating with high-risk material and **voluntary** for organizations seeking to strengthen due diligence



## Clause 1.6

The Organization producing or trading high-risk material as defined by FSC shall use FSC's traceability system for transactions of these materials

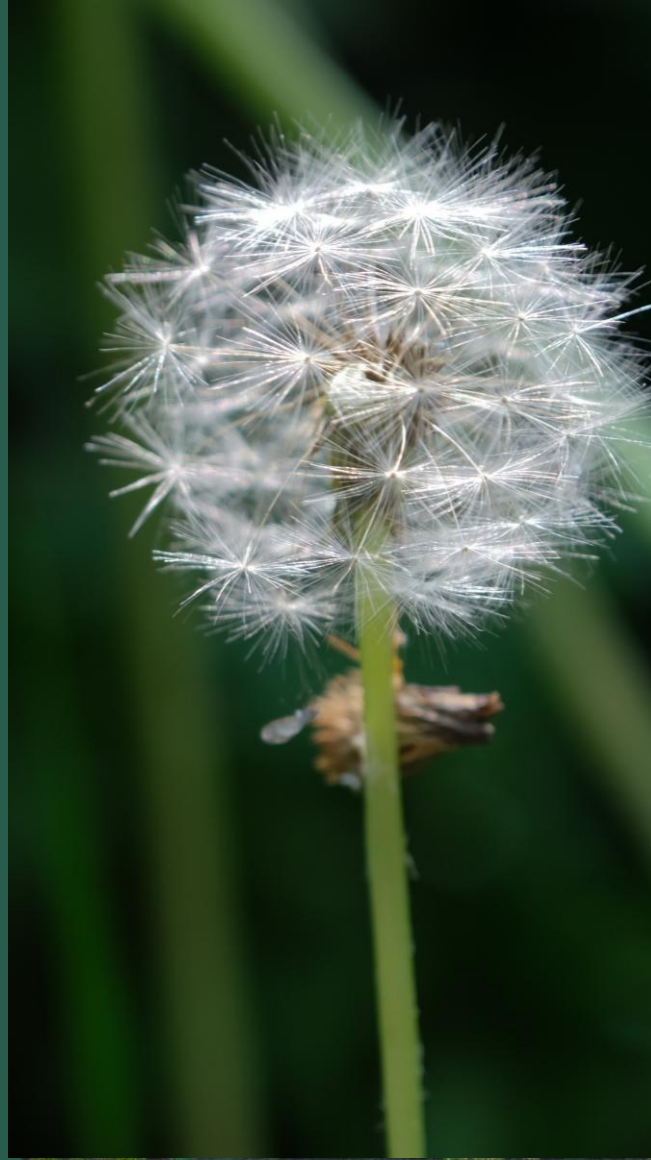


## Proposed clause 1.6 considers:

- ❖ FSC Int. BoD's decisions, and a motion approved at the FSC GA – Motion 30/2025
- ❖ Existing Advice notes and related risk mitigation measures
- ❖ Identified risks will be shown on COC Risk Hub



# Workers' rights



# Changes to Occupational Health & Safety (OSH)

Health and safety requirements now in Section 8, alongside the FSC CLR.



## D1-0 Changes in Section 1

- Enhancement of OHAS requirements (Clause 1.4)
- Inclusion of right for worker-elected health & safety representatives



## D2-0 Changes in Section 8

- Moved to Section 8
- 'OHAS' references amended to OSH
- Amended clause on elected OSH representative (Clause 8.1e))



- There remain concerns from stakeholders on the practical implications of this right for elected OSH representatives.
- Stakeholders asked directly on OSH as FSC CLR in D2-0 consultation.

## Why any changes?

- Closer alignment with ILO (H&S as fundamental right since 2022)
- Motion 51/2021 implementation

# Changes to Universal Requirements (Section 8)

D1-0 changes largely maintained, as requirements stay consistent with current Standard requirements



## FORCED LABOUR

- Consistent with V3-1
- Reference in D1-0 to 'prison labour' removed



### Why was the reference removed?

- Mixed views on option to prohibit/allow
  - Request for FSC not to 'promote' its use
  - Any use limited to small proportion
- Compromise: Enhanced guidance instead.



## CHILD LABOUR

- Consistent with current V3-1
- Reformatting changes kept from D1-0.



## DISCRIMINATION

- Consistent with current V3-1.
- Minor changes kept from D1-0.

# Changes to Universal Requirements (Section 8)



## FREEDOM OF ASSOCIATION

- Reference to ‘access’ maintained from D1-0
- Wording amended, including to better mirror the Motion text e.g., ‘workers’ instead of ‘workplace’.



There remain concerns from North American stakeholders on the legal implications of access by third-parties, in both unionized and non-unionized

### D1-0 (Clause 8.5.2)

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

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



### D2-0 (Clause 8.6.2)

*The Organization shall ensure workers’ representatives (including trade union representatives) **have physical access to workers, including provision of information on the workers’ location(s), where such access allows for exchange of information with workers.***

*NOTE: The exercise of this right by representative(s) is with due respect to rights of property and management, **not at the detriment of the efficient functioning of The Organization, and with consideration of any other existing legal and/or regulatory requirements or binding written agreement(s).***

# Self-Assessment Requirements

*Self-assessment requirements amended to focus on 'high-risk', with minor changes to Annex 3 self-assessment.*

## COMPLETE & MAINTAIN AN UP-TO-DATE SELF-ASSESSMENT

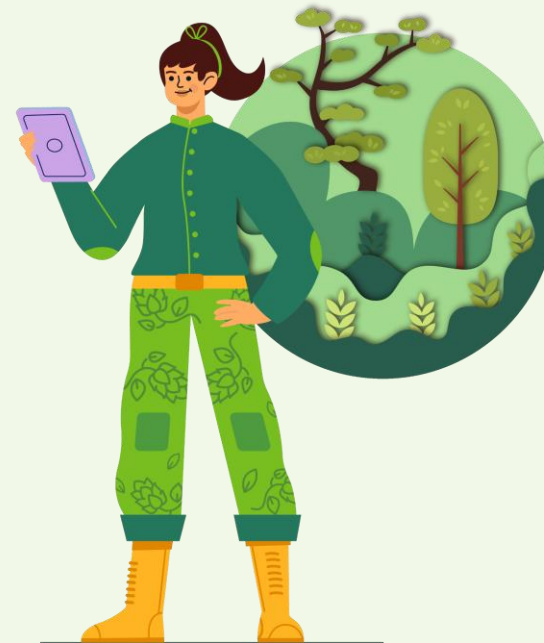
- Focus on description of the 'high risk' FSC CLR as provided in the FSC CLR risk matrix (Clause 8.2b))

## SELF-ASSESSMENT (ANNEX 3)

- Informative box expanded
- Questions and Answer selections reduced

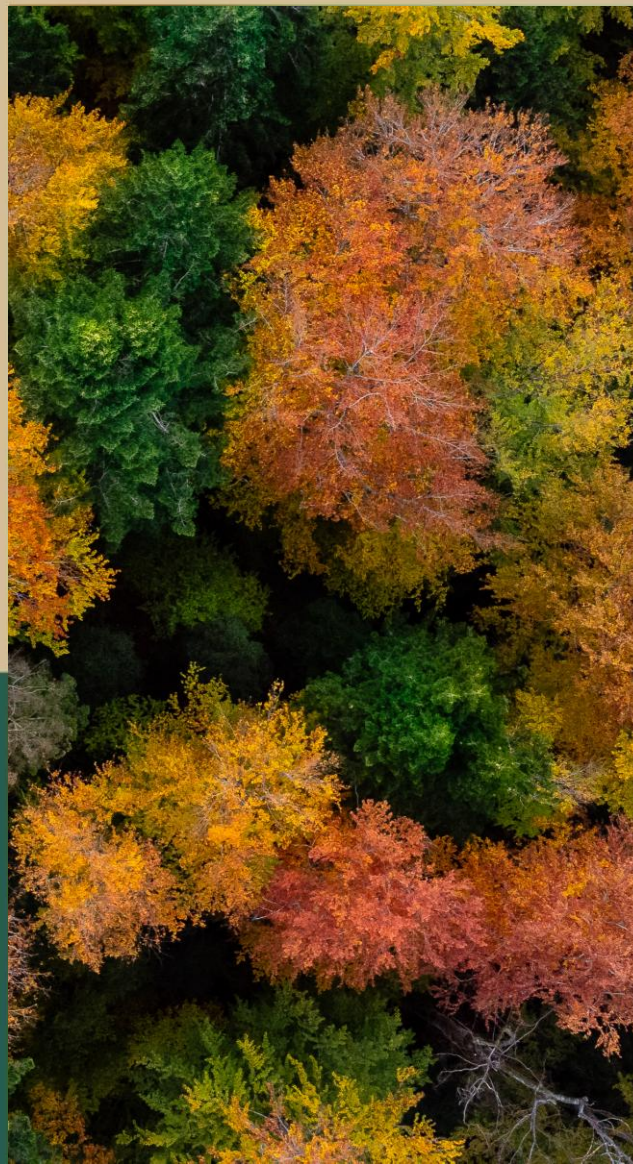
## WHY?

- To remove admin burden in 'low risk' contexts
- To focus efforts on those flagged as 'high risk'
- To enhance understanding
- To streamline



# Evaluation requirements

Evaluation of FSC CLR



# Changes to FSC CLR Evaluation (Sections 12 and 14)

## Revised Proposal for D2-0

- Risk-based approach enhanced to determine further evaluation based on FSC-defined classifications
- Based on concepts from ADVICE-40-004-23 and ADVICE-20-011-16 for both Organizations and contractors



## Requirements include:



### LOWER CLASSIFICATION

Indicators to reduce classification including past performance (NCs) and audit.



### SAMPLING

Sampling formula maintained for worker interviews for final classification of 'high risk'



### GROUP INTERVIEWS

Explicitly permitted at CB discretion if confidentiality ensured.

## RATIONALE:



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

# FSC CLR Risk Matrix

*This matrix is the starting point for a risk-based approach to FSC CLR evaluation for Organizations and their contractors.*

# 206

## Countries/territories

### WHAT?

A risk classification per FSC CLR per country/territory, classified as either 'low' or 'high'.

# 1

## Starting point

### WHY?

To provide a country-level risk classification per FSC CLR, to be used to determine further evaluation by all certification bodies.

# 7

## References

### HOW?

Revised to prioritise use of existing FSC risk assessments (2 sources)  
OR  
where not available, references 5 reputable and publicly available datasets/reports to determine the classification

# FSC CLR Risk Matrix: Example Countries\*



Country/Territory	Available CWRA or Risk Assessment	Child Labour	Forced Labour	Discrimination	Freedom of Association
Austria	<u>Yes</u>	Low	Low	Low	Low
Azerbaijan	No	Low	High	High	Low
Bahamas, The	No	High	High	High	High

## Clarifies the source of the classification.

Where there exists a risk assessment, the hyperlink to the FSC Document Centre is provided.

## Application of Section 12 and 14


\*These countries were randomly selected to show variation.


FSC CLR Risk Matrix Consultation Supporting Document  
Terms and Definitions, FSC-STD-40-004 V4-0 D2-0

# Example of CLR Risk Matrix Application

## Example 1: All FSC CLR considered 'low risk'

Child Labour	Forced Labour	Discrimination	Freedom of Association
Low	Low	Low	Low

 CB checks self-assessment (including contractors\*)

 CB checks for any substantiated concerns.

Provided there are no substantiated concerns, the CB *'may choose to conduct no further evaluation.'*

\*If the contractors are based in another country which may not be considered low, Section 12 and 14 applies.



This approach addresses stakeholder requests to remove audit burden/resource burden, especially in low-risk contexts.

Section 14, FSC-STD-20-011 V4-4



# Example of CLR Risk Matrix Application

## Example 2: All FSC CLR considered 'high risk'

Child Labour	Forced Labour	Discrimination	Freedom of Association
High	High	High	High

### 1. CB checks to see if the 'high risk' could be reduced to 'low risk' if:

- No substantiated complaints
- Not in an FSC-designated 'high risk' supply chain/region.

### 2. Lowering criteria

Then, either of the following must be met:

- No major NCs for FSC CLR in last 5 years  
OR
- Second- or Third-party Audit for FSC CLR with audit documentation provided.

### If the criteria **NOT** met:

- The FSC CLR classification remains as 'HIGH'
- CB checks self-assessment
- CB applies the formula for interviews (with reduction if worker representatives are included).

### If the criteria **ARE** met :

- The FSC classification can be reduced to 'LOW'
- CB checks self-assessment
- CB 'may choose to conduct no further evaluation.'

# Take-back, Service provision and reclaimed material



# Take-back Revised Requirements

## WHAT HAS BEEN DONE?

1. Industry desk-test with some selected companies (focused on clarity and feasibility of implementation)
2. Consultation feedback reviewed and requirements revised



## WHAT HAS CHANGED ?

- Definition and clauses revised to ensure clarity.
- Objective evidence for product identification, no normative prescribed identifiers.
- No inclusion of non-eligible input and no change of product type ( minor activities allowed)



## WHY THE CHANGE ?

- Enhance feasibility of implementation by adopting industrial feasibilities.
- Reduce complexity and focus on preventing key activities that threatens system integrity



**Enhancing clarity, feasibility & strengthening system integrity of the FSC system**

# Service Provision Revised Requirement

## WHAT HAS CHANGED ?

Separation of service provision from the outsourcing section.  
Dedicated sections for:

- FSC-certified Organizations Providing Services (New Sec. 14)
- Leasing (New Sec. 15)



## WHY?

- Address concerns raised by stakeholders on confusion.
- Give visibility to service provision (applicability box with clarity and examples of services).



## LEASING REQUIREMENTS

- Leasing requirements revised based on industry desk-test and consultation feedback.
- Identification and eligibility requirement are same as for take-back, simplified to enhance feasibility.



**Enhancing Visibility of Service Provision Certification in the FSC system**

# Sourcing Reclaimed Materials

## ANNEX 5

Removed, to be included in guidance document :

### Why ?

- Serves informative purpose only
- Examples not exhaustive
- Definitions and requirements as the normative focus

## Supplier audit changes:

- Exemption for suppliers already audited by an FSC CB maintained.
- Term ‘same calendar year’ changed to 12-months since the last audit to avoid confusion”

## General changes:

- Scope revised, redundant statements removed, reference to Annex 5 removed
- Note under clause 1 removed to avoid confusion, (definitions and requirements sufficiently address the intent of the notes)

# Salvaged Wood

## Definition updated

Non-forest salvaged wood

Non-forest-based wood

- Exclusion of wood from agroforest and agricultural sources.
- Alignment with existing terms and definitions made for D2-0.

## Approaches



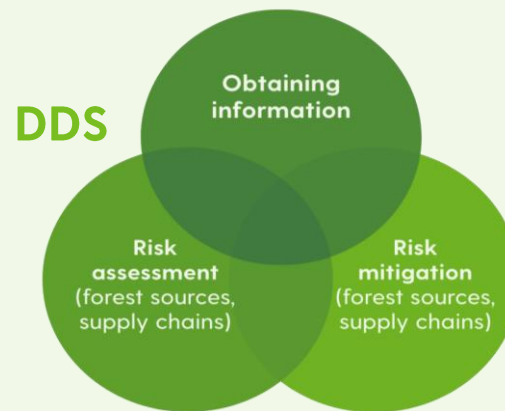
Application of FSC-STD-40-005



R&D to consider as claim contributing inputs

## FSC-STD-40-005

- Non-forest-based wood would be treated as controlled material
- Areas without existing risk assessments, companies are required to develop 'Extended Company Risk Assessments' (ECRAs)



FSC guidance provision on ECRA development and evaluation.

## RESEARCH & DEVELOPMENT



R&D proposed to address concerns, and support decision-making on consideration as claim contributing input

## Scope



Impacts and relevance for FSC



Market demand and utilization



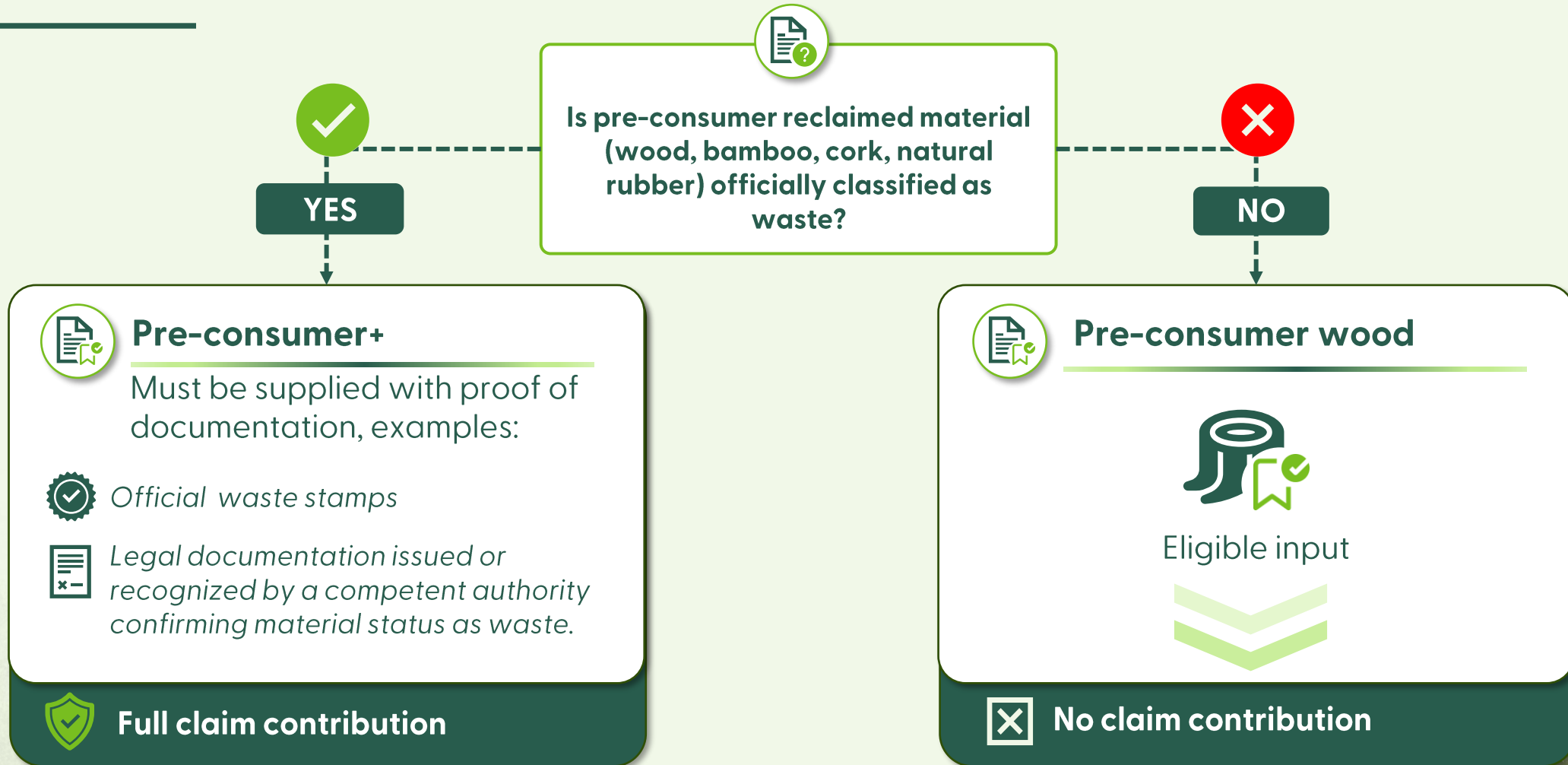
Legality and material classification



Risks and mitigation measures

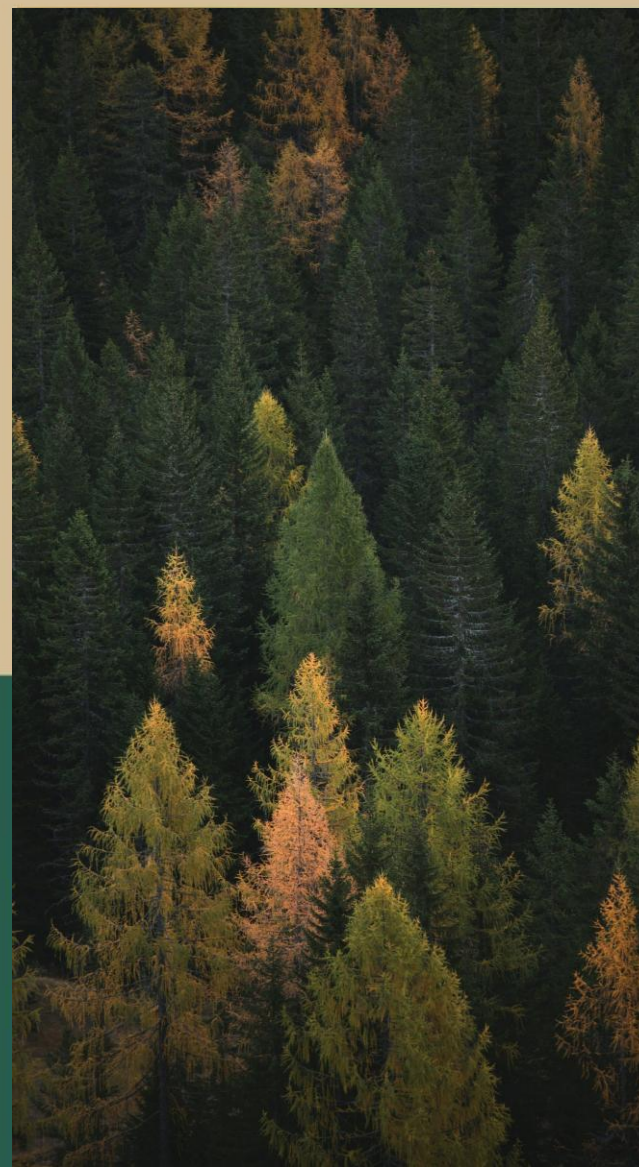
# Pre-consumer Claim Contribution

(wood, bamboo, cork, fibre, natural rubber)



\*Definition for Pre-consumer+ has been added and tables 1, 3, 4, 7 updated accordingly

# Group and multisite certification update



# COC OPERATIONAL MODELS

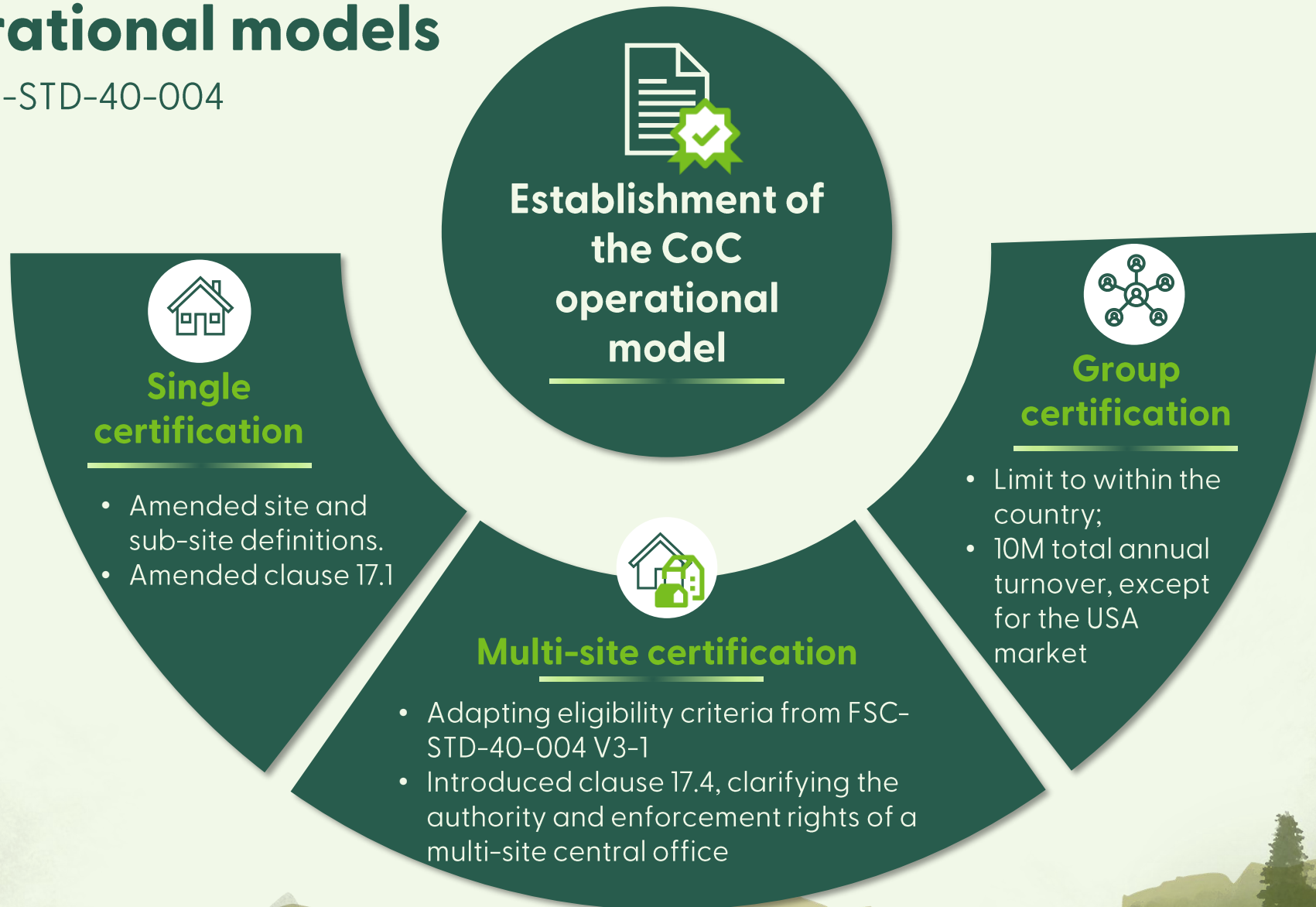
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**FSC-STD-40-004**

Section 17

# CoC operational models

Section 17 – FSC-STD-40-004






# CoC group certification eligibility criteria

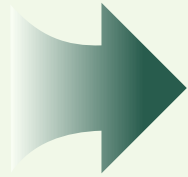


## Draft 1-0 and concerns


- USD 10M annual forest products turnover; or
- No more than 49 FTE (full-time equivalent)

### Concerns and suggestions

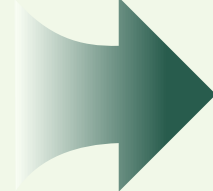
-  **Risk of a massive transition** from single to group certifications
-  **'forest product turnover' term** to be reconsidered
-  **Reconsider thresholds** FTE, participating sites' limitation, and country-level restriction.



## WG discussion

 **Internal review**  
on feedback and impacts

 **Consultation**  
with some CBs, ASI



## Proposed change

### Group certification eligibility criteria

- ✓ Limit to within the country;
- ✓ 10M total annual turnover, except for the USA market; or
- ✓ Staff headcount of no more than 49 FTE

# **REQUIREMENTS FOR MULTI-SITE AND GROUP CERTIFICATION**

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**FSC-STD-40-004**

Sections 18 + Annex 4

# Number of group participating sites at entry – Q28



Groups with fewer than 100 participating sites may be reasonably managed with simpler group management systems/tools (e.g., Excel Worksheets).



A middle ground between 100 and 20 participating sites



Align with other thresholds (extra requirements for the central office's auditors; certification body thresholds for defining the growth limit for the central office)



Concern regarding group size becoming excessively large or geographically dispersed, leading to challenges in CB's verification



Set a limitation for group participating sites at entry



Other suggestions?

# Central office management system

## Section 18 – FSC-STD-40-004



### Central office audit program

#### NEW requirements

- ✓ Conduct internal audits of **all** participating sites (and subsites);
- ✓ Annual internal audits must include a sampled review of high-risk contractors (risk level assigned by CB)



### Administrative and qualification requirements

#### AMENDMENTS of requirements

- ✓ Administrative requirements: Removed 1 clause excluding the internal auditing activities in case the participating site acts as the central office.
- ✓ Central office qualification considers the managing team responsible for managing CoC certification (Clause 18.3.1).

\* formal audit waivers as a result of inactivity still possible

# Annex 4

## Requirements for Internal Evaluation of the Participating Sites



### CLR and evaluation of the contractor

NEW REQUIREMENTS

- ✓ Align with CB's audit requirements.
- ✓ Central office to audit CLR and the evaluation of the contractor against the requirements in Annex 4



### Nonconformity

AMENDMENTS

- ✓ More consistent use of requirements for nonconformity for greater clarity for consistent implementation.



### Remote audit

AMENDMENTS

- ✓ Align with the remote audit in D2-0 of FSC-STD-20-011



# EVALUATION OF GROUP AND MULTI- SITE CERTIFICATIONS

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**FSC-STD-20-011**

Section 7

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

Proposed method for evaluating sub-sites for multi-site and group certification\*



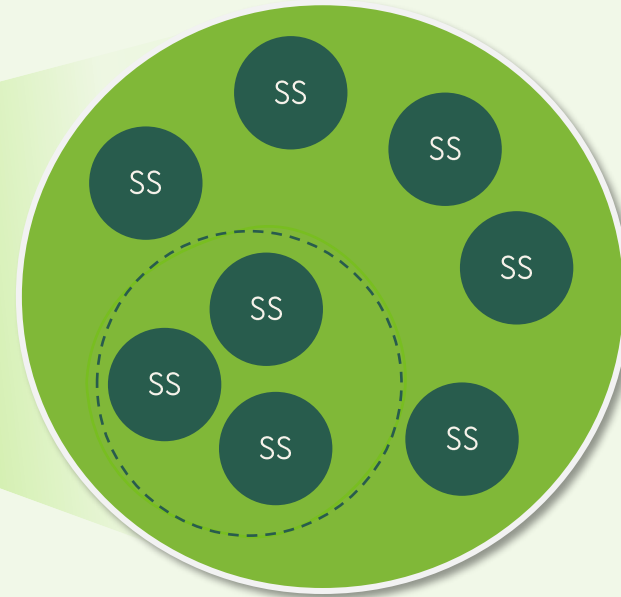
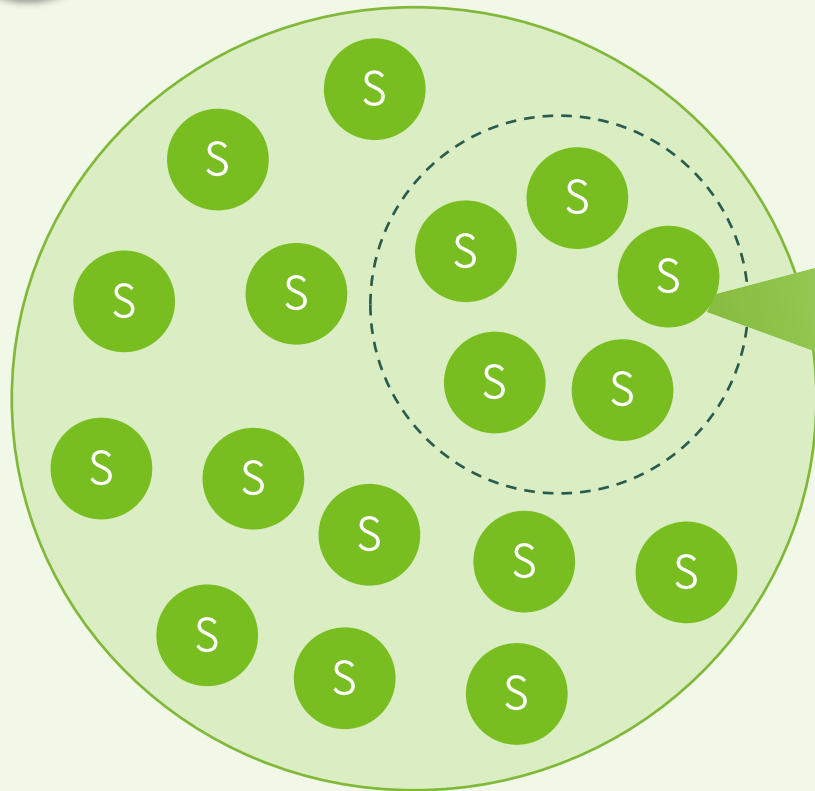
## STEP 1

Set the sampling for participating sites



## STEP 2

If the selected participating sites have sub-sites, sample the sub-sites

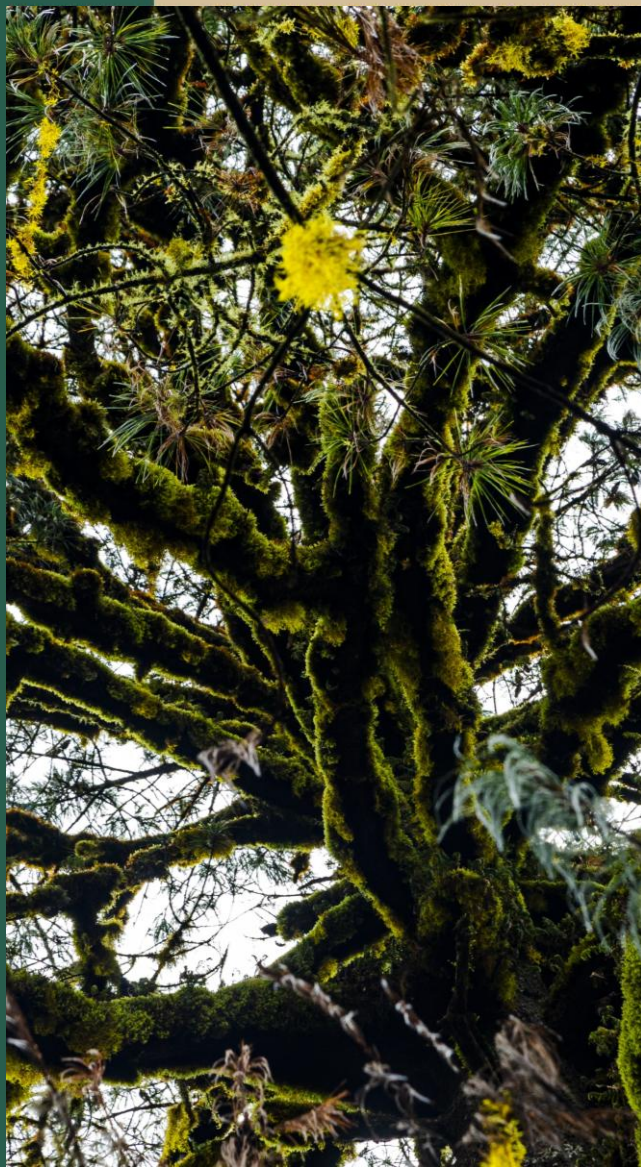


# Proposed change - Risk index matrix

## Evaluating multi-site and group certification

Risk factor		Score	Score Given
Ownership	All participating sites have common ownership	0.1	
	Participating sites do not have common ownership	0.2	
Certification size	0–20 participating sites	0.2	
	21–100 participating sites	0.3	
	101–250 participating sites	0.4	
	251–500 participating sites	0.5	
	501–1000 participating sites	0.6	
	> 1000 participating sites	0.7	
Central office's performance	No CAR issued to the central office in the previous evaluation	0.1	
	Not applicable (there was no previous evaluation)	0.1	
	Only minor CARs in the previous evaluation	0.2	
	1–2 major CARs in the previous evaluation	0.3	
	3 or more major CARs in the previous evaluation	0.4	
Audit type	Annual surveillance evaluation	0.1	
	Re-evaluation	0.1	
	Main evaluation	0.3	
	Audit for inclusion of new participating sites in the certificate	0.3	
<b>TOTAL (R = sum of the scores given)</b>			Σ

# Non-conforming products

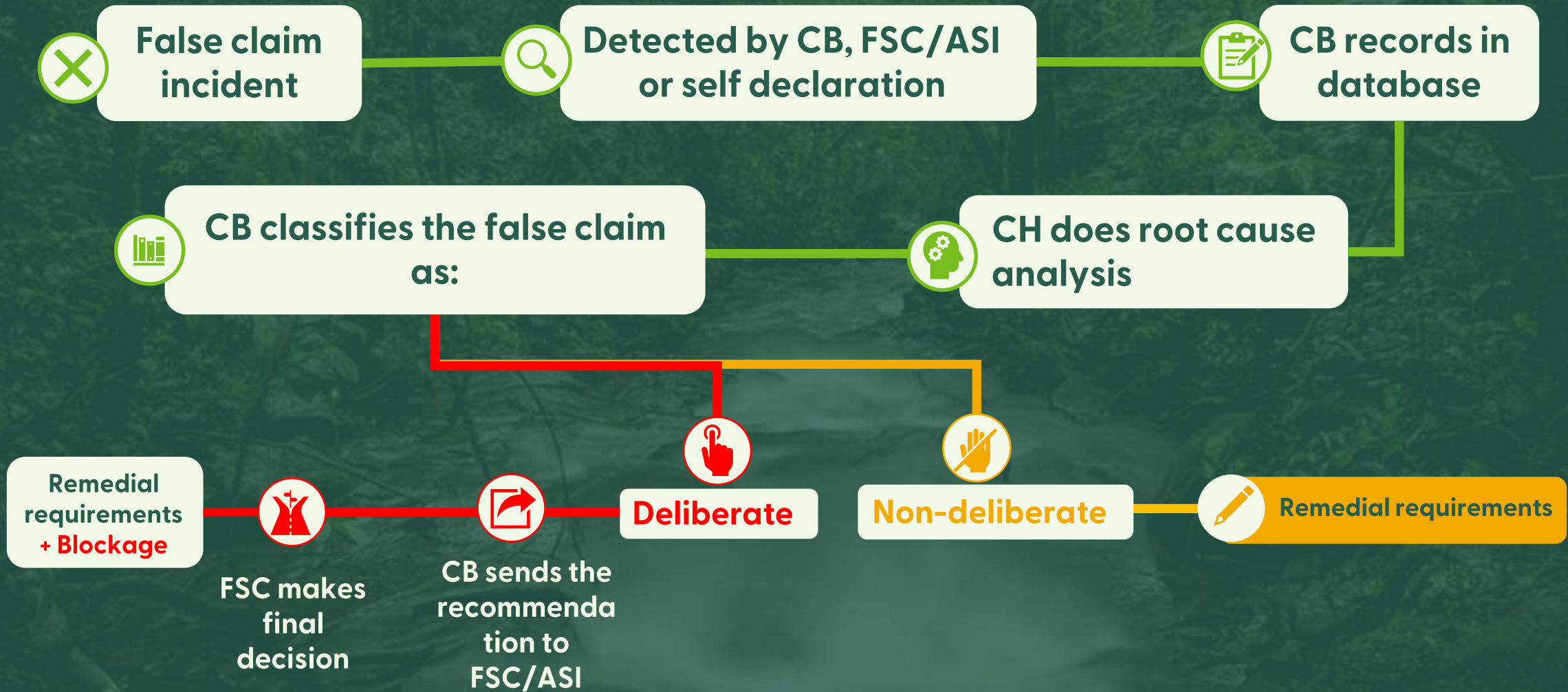


# Key proposed changes to Non-conforming Products

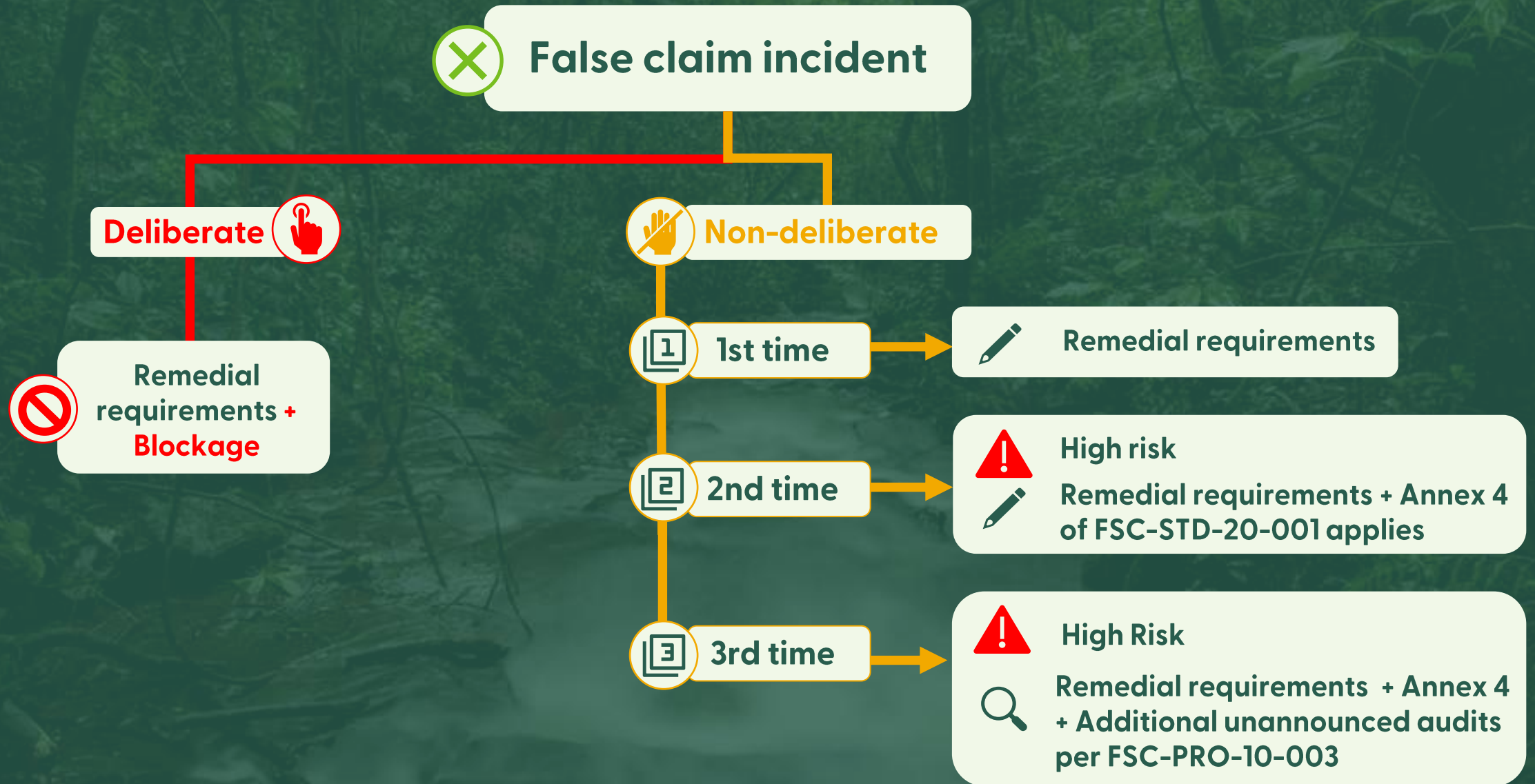
Annex 2 in FSC-STD-40-004 &  
Annex 6 of FSC-STD-20-011



# False Claims Process in D2-0



# False Claims Process in D2-0



# Accreditation standard FSC-STD-20-011



# REMOTE AND HYBRID AUDIT

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**FSC-STD-20-011**

Annex 5

## PRE-REQUISITES FOR REMOTE & HYBRID:



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



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



## PRE-REQUISITES FOR FULLY REMOTE:

- ✓ Low-risk
- ✓ No substantiated complaints or unresolved disputes / public cases **that CB is aware of**
- ✓ No major NCs in past 3 years that would require on-site evaluation of corrective actions
- ✓ No False Claims incident in last 5 years

**Main evaluations & Re-evaluations:** always on-site audit except for

- traders without physical possession
- traders with physical possession where storage or logistic activities are outsourced



# Low-risk organizations:

**NOTE:** High-risk contractors are not eligible for remote audit.



## PROCESSORS

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

- c) Sites/ Sub-sites without direct physical possession (e.g. sales office)
- d) Sites/ Sub-sites with physical possession of finished and FSC labelled products
- e) Sites/ Sub-sites with physical possession of semi-finished products with FSC label or products which are palletised or otherwise maintained as a secure unit

 **ALSO FOR PROJECTS**



## TRADERS

- Without direct physical possession; **or**
- With physical possession of finished and FSC labelled products; **or**
- With physical possession of semi-finished products with FSC label or are palletized or otherwise maintained as a secure unit



## PROJECTS

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

# MINIMUM AUDIT DURATION

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**FSC-STD-20-011**

Table 3 in Annex 4

# Factors impacting minimum audit duration



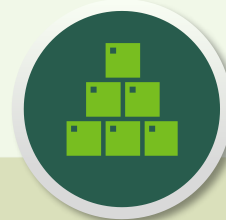
**FSC-STD-40-004**  
Baseline for chain  
of custody



**FSC-STD-40-006**  
Baseline for Project  
Certification



**High-risk  
contractors**



**High risk regions  
& materials**



**FSC-STD-40-005**  
(Controlled  
Wood)



**Reclaimed  
Material**



**Multi-site and  
Group**



**FSC-STD-40-004r/  
FSC-STD-40-006r  
Regulatory Module**



# Factors impacting minimum audit duration - Scenarios

## Example 1

A processor	1
Has 450 full-time employee	+0.25
Multisite with 2 high-risk and 2 low-risk participating sites	$2 \times 0.25 + 2 \times 0.5 = 1.5$
Has 1 low-risk and 2 high-risk contractors:	$2 \times 0.25 = 0.5$

**Total: 3.25 days minimum audit duration**

## Example 2

A trader with physical possession	0.75
Has 50 full-time employee	0
Has high-risk species in its scope: 0.25	+0.25
Has 1 low-risk contractor	0

**Total: 1 day minimum audit duration**



# Stay engaged in the process!

Consultation is open 15 May 2026 – 15 June 2026



Visit the Consultation Platform to participate

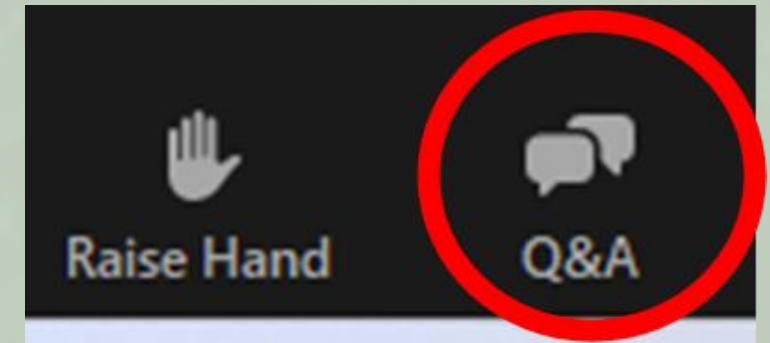


Visit the CoC Hub, Revision Webpage and Process Webpage for more information



Reach out to [chainofcustody@fsc.org](mailto:chainofcustody@fsc.org) with questions

# Q&A



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

# We want your feedback!

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# Thank you



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