RISK MITIGATION MEASURES DATABASE

Report of responses from focused consultation on Risk Mitigation Measures database

FSC FORESTS FOR ALL FOREVER™

Title:	Risk Mitigation Measures database	
Dates:	**Publication date:** 6 July 2026	
Responsible program:	**Country Requirements, Policy & Performance**	
Contact for comments:	**Email:** country_requirements@fsc.org	
Objective of document:	This report provides an overview of the stakeholder feedback on the first version of the non-normative guidance, Risk Mitigation Measures database.	
Confidential?	☐ Yes	☒ No
Intended audience	☐ Internal (FSC)	☒ External
Personal data included?	☐ Yes	☒ No

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FOREWORD AND INTRODUCTION

FSC would like to thank respondents for their participation in the consultation as part of the first draft of Risk Mitigation Measures (RMM) database. The focused consultation was open on FSC Consultation Platform between 10 March and 30 March 2026 and was used to collect stakeholders' feedback on a series of questions regarding the RMM database examples.

This consultation report contains an analysis of the submitted comments, as well as a summary of the issues raised in relation to the questions posted during the consultation period.

FSC will take all responses and comments into consideration and use them to inform and guide the improvement of the Risk Mitigation Measures database.

METHODOLOGY FOR THE ANALYSIS OF RESULTS

Consultation structure

The focused consultation consisted of 11 questions. Most questions used a Binary-scale format. Each of the rating question (close-ended question) was followed by an open-text field allowing respondents to provide justification, clarification, or additional suggestions (open-ended questions).

All responses submitted through the FSC Consultation Platform were included in the analysis and formed the basis for qualitative assessment. The methodology involved quantitative analysis and qualitative analysis.

Quantitative analysis

Quantitative analysis focuses on responses to the consultation questions and does not include participant profile information, which is presented in the Participation Overview. Percentages and absolute numbers in this report are based on the number of responses to each individual question, as participation varied across questions and not all respondents answered all questions.

Qualitative analysis

Following the quantitative analysis, consultation comments were analysed qualitatively to identify common themes, areas of agreement and disagreement, and specific technical or governance concerns. Comments were organised by topic and summarised for each consultation question to reflect the range of stakeholder perspectives. Issues raised consistently across multiple respondents or stakeholder groups were identified as broader themes, while less frequently raised comments were included where they provided relevant or important insights.

Statistical tests were conducted to assess whether responses differed by country, stakeholder type, or the interaction between these variables. Chi-square tests were used to evaluate whether observed differences in response distributions were likely to reflect genuine differences between groups rather than random variation. A p-value of less than 0.05 was considered statistically significant. Given the small sample size, these results should be interpreted with caution and are intended to indicate potential patterns rather than definitive differences between groups.

PARTICIPATION OVERVIEW

This section provides a descriptive overview of consultation participation, including respondent numbers, geographic distribution, and stakeholder representation.

Overall, 48 respondents participated in the consultation. Of these, 40 provided substantive feedback, defined as responses to one or more consultation questions (including ratings and/or open-text comments). The remaining 8 respondents completed only the identification section and did not contribute to the consultation questions. The participation overview is based on all 48 respondents who took part in the consultation. Analyses of consultation questions are based on the 40 respondents who provided substantive feedback (i.e., responses to one or more consultation questions including ratings and/or open-text comments). Respondent profile figures in this section are based on all 48 respondents, while question-level analysis is based on the number of respondents who answered each respective question.

Regional Representation

The consultation received participation from stakeholders across all FSC regions, ensuring broad geographic representation. Responses were received from 19 countries.

Europe accounted for the largest percentage responses representing 54% of total participants (26 respondents). North America contributed 25% (12 respondents), followed by Latin America with 9% (4 respondents), Asia Pacific with 8% (4 respondents), and Africa with 4% (2 respondents).

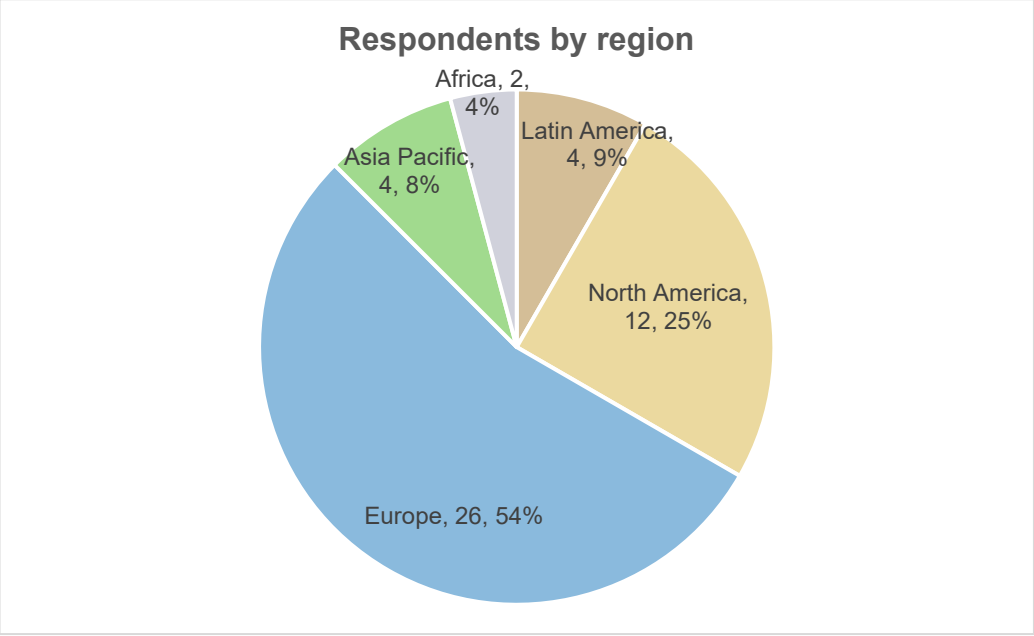


Figure 1 Respondents per region

At the country level, Sweden recorded the highest number of respondents (9), followed by USA (7) and Canada (5). Other countries with notable participation included Brazil and Finland, 4 respondents each. The remaining responses were distributed across 14 additional countries, reflecting a geographically diverse range of feedback.

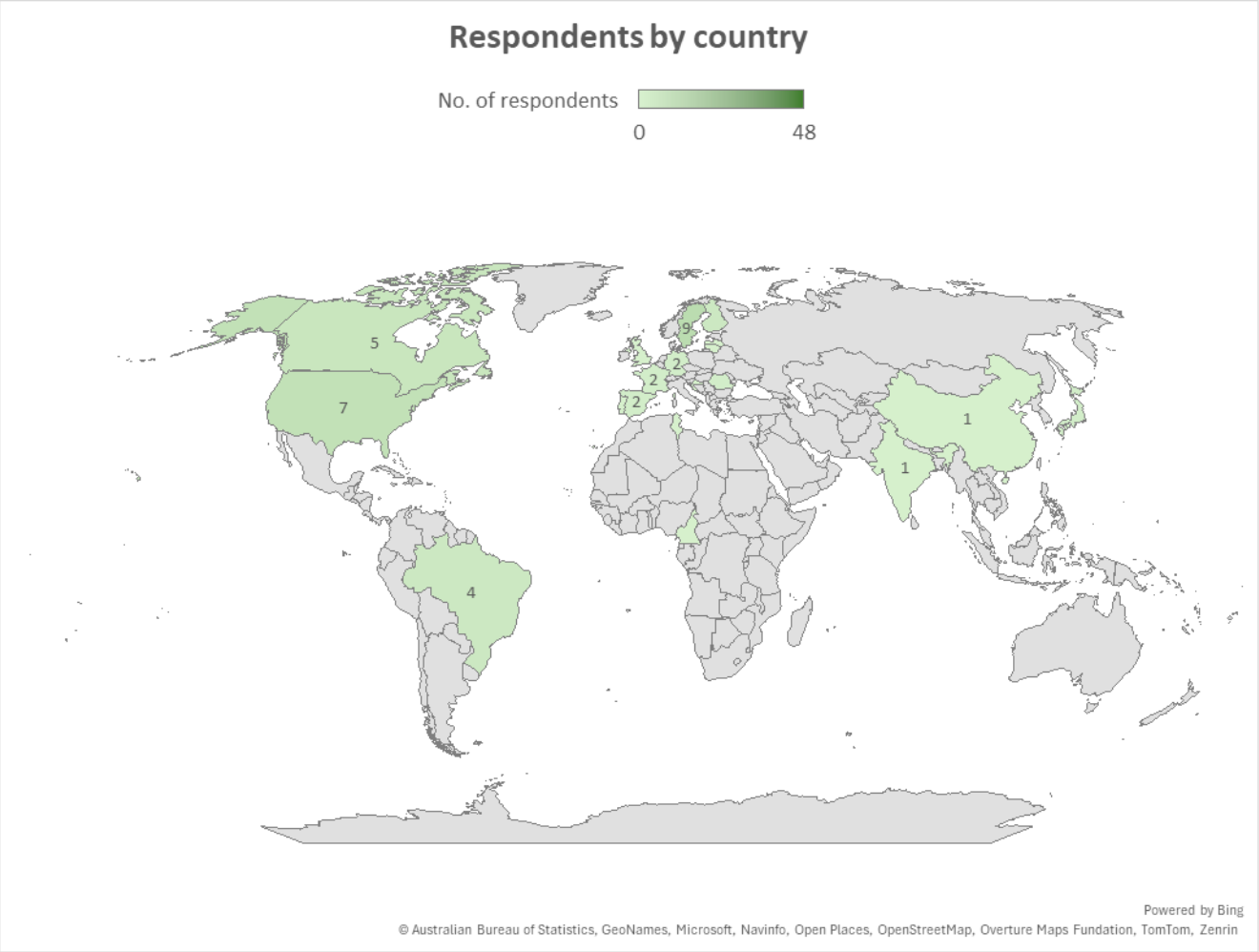


Figure 2 Number of respondents per country

Stakeholder Type

When analysing the participation by stakeholder type, Certificate holders represented the largest group, accounting for 46% of respondents. This was followed by FSC Network Partners at 21%, FSC Member at 10% and Certification Body at 8%. Consultants and Environmental NGOs represented 6% and 4% respectively and ASI staff and “Other” accounted for 2% each.

The stakeholder distribution reflects a strong representation from implementation-focused groups, particularly Certificate Holders and FSC Network Partners.

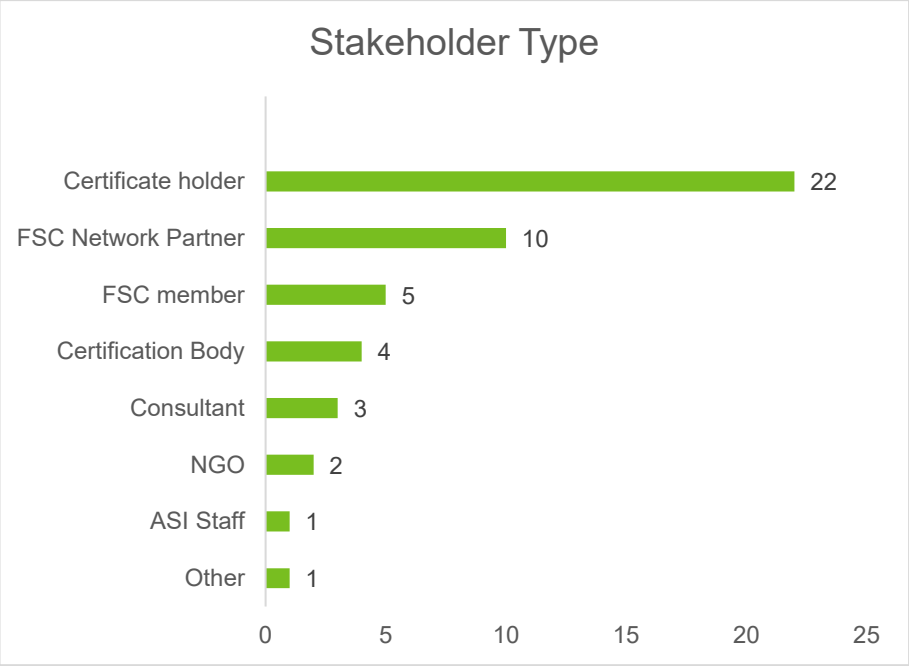


Figure 3 Number of respondents by stakeholder type

Limitations

The consultation findings should be interpreted as indicative rather than fully representative of all stakeholder perspectives globally.

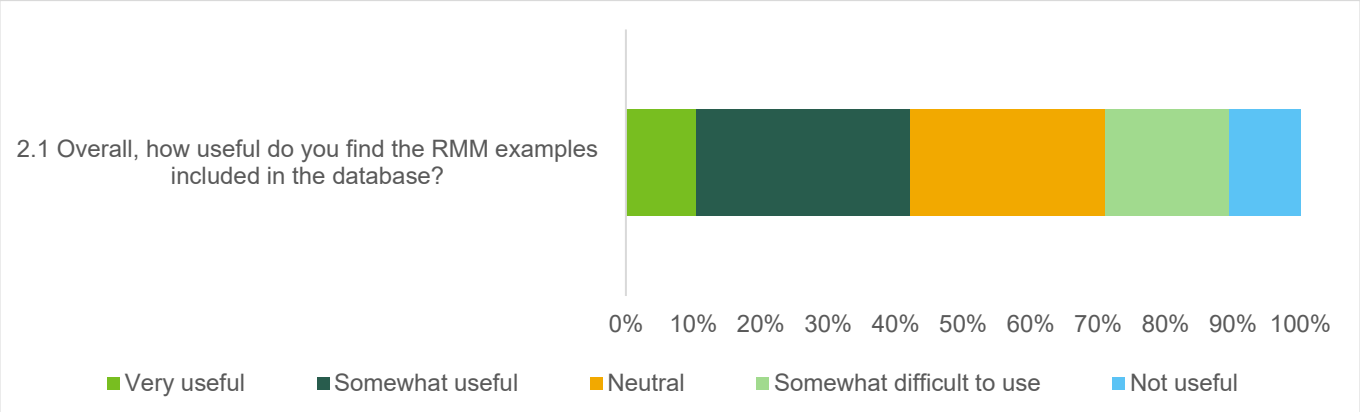
SUMMARY OF CONSULTATION FEEDBACK

Below is a summary of key topics on which participants provided feedback. Each topic includes the consultation question, quantitative results, and qualitative results. The qualitative results also present an assessment and conclusions on how the feedback will shape the RMM database.

Q1: Overall, how useful do you find the RMM examples included in the database?

Summary of quantitative analysis

A total of 38 respondents provided a rating, and 27 respondents provided substantive comments. Among rated responses, 42% viewed the database positively (Very useful or somewhat useful), 29% were neutral, and 29% expressed negative views (Somewhat difficult to use or not useful), indicating moderate overall support for the concept alongside significant concerns regarding its implementation and usability.



Feedback by respondent

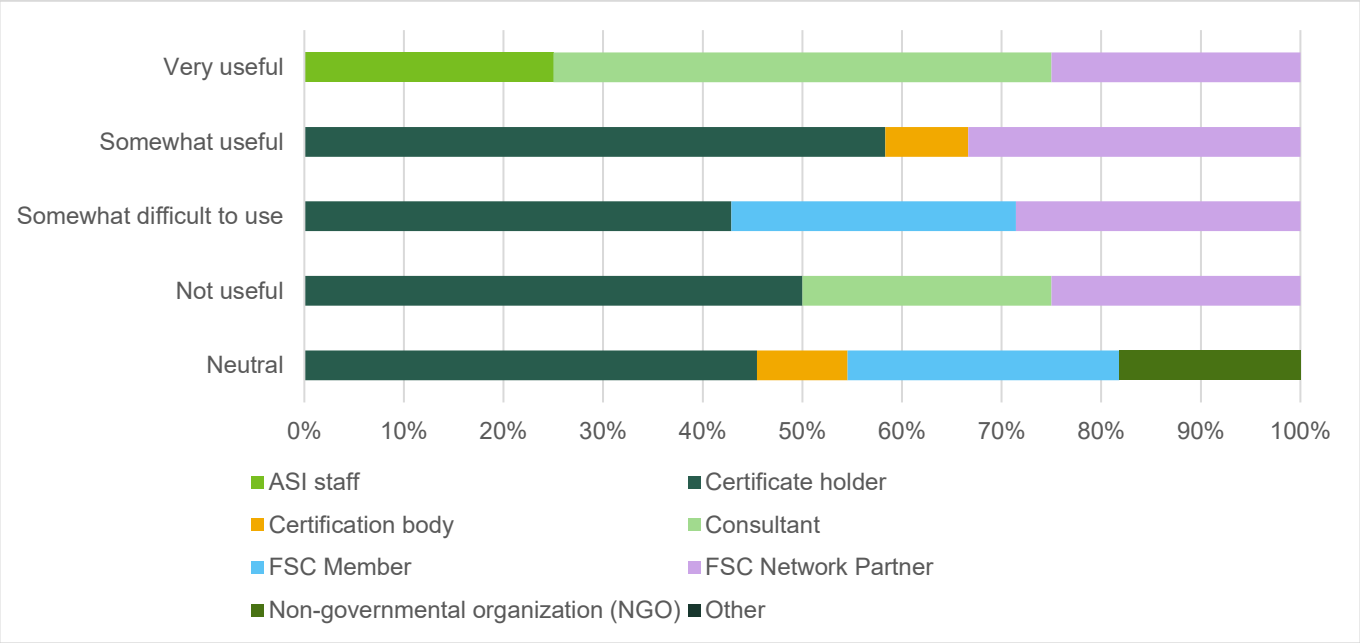


Figure 4 Agreement levels by stakeholder type for Q1

Summary of qualitative analysis

Overall, respondents supported the concept of a centralized database of RMM examples and recognized its value as a reference tool, particularly for developing risk assessments and promoting consistency across countries. However, feedback highlighted several important limitations. The most common concern was that the examples are highly country-specific and therefore difficult to apply across different national contexts. Respondents also noted that the database currently contains few examples and provides limited coverage of countries and risk indicators. Many stakeholders emphasized the need for greater flexibility to adapt examples to local legal and operational circumstances and requested clearer information on the purpose, status, and intended use of the database. Overall, stakeholders supported further development of the database but called for broader coverage, greater contextualization, and clearer guidance on its use.

Key theme	Summary of Comments	FSC Response
Value of the database as a reference tool	Respondents generally welcomed the creation of a centralized repository of RMM examples. The database was seen as useful for supporting Risk Assessment (RA) development, providing examples of potential mitigation approaches, facilitating calibration, and promoting greater consistency across countries. Several stakeholders noted that the value of the database is likely to increase as more examples are added over time.	FSC welcomes the recognition of the database as a useful platform for sharing examples of risk mitigation measures and supporting consistency in risk assessment development. The database is intended as a non-normative reference tool that demonstrates the logic and structure of mitigation approaches drawn from approved or advanced draft Risk Assessments. FSC will continue to expand the database through the periodic incorporation of examples from newly approved Risk Assessments.
Adaptation to national contexts	Many respondents noted that the examples are often highly country-specific, making it difficult to assess their relevance in other jurisdictions. Feedback emphasized the need for flexibility to adapt examples to national legal frameworks, existing practices, and local risk conditions. Several respondents also suggested that compliance with existing legislation or established national procedures should be recognized where appropriate.	FSC acknowledges concerns regarding the country-specific nature of many examples. To address this, FSC has added User Guidance clarifying that examples are intended to demonstrate mitigation logic and should be adapted to national circumstances and not verbatim. FSC has also replaced the former country column in the database with a risk contextual statement describing the regulatory and forest-management context addressed by each example, while retaining country traceability internally for annual review purposes.
Coverage, representativeness and clarity of purpose	Respondents noted that the database currently contains a limited number of examples and does not yet cover all countries or risk indicators. Several stakeholders questioned how examples were selected and highlighted that some indicators contain multiple examples while others contain none. Concerns were also raised regarding the role of the database, its relationship to approved risk assessments, and the potential for users to misinterpret it as a normative or comprehensive source of requirements.	FSC acknowledges feedback regarding the current scope of the database and the need for greater clarity regarding its purpose and intended use. The ‘Purpose’ sheet has been revised to explicitly state the database's non-normative status and to clarify that it does not create new requirements or replace country Risk Assessments, which remain the applicable reference documents. FSC has also added a User Guidance section explaining the intended use of the examples and will continue expanding coverage through the incorporation of additional approved Risk Assessments over time.
Concern on Feasibility and proportionality of mitigation measures included in the database	Some respondents considered the examples detailed, resource-intensive, costly, or impractical to implement. Stakeholders argued that the examples often resemble certification audit requirements rather than risk mitigation	FSC acknowledges concerns that some examples may appear overly detailed or burdensome in certain contexts. FSC notes that the examples originate primarily from centralized-process Risk Assessments and are intended to illustrate possible approaches rather than prescribe mandatory measures. Under FSC-PRO-60-006b Clause 14.3, mandatory mitigation

	measures and may not be proportionate to the level of risk being addressed.	measures are only possible in Risk Assessments developed through a major-type process. To improve understanding of proportionality, FSC has added a Risk Criticality and RMM Proportionality section that articulates FSC's interpretation of the calibration principles contained in FSC-PRO-60-006b Section 14 and FSC-STD-40-005, emphasizing that mitigation measures should be commensurate with the nature and severity of the identified risk. The user guidance further clarifies that Certificate Holders may implement alternative control measures in accordance with FSC-STD-40-005 Clause 4.1.

Q2: Are the examples of mitigation measures provided in the database effective in mitigating the identified non-negligible risk?

Summary of quantitative analysis

In total, 31 participants answered this question. 15 answered “yes” and 16 answered “no”.

Response by stakeholder type

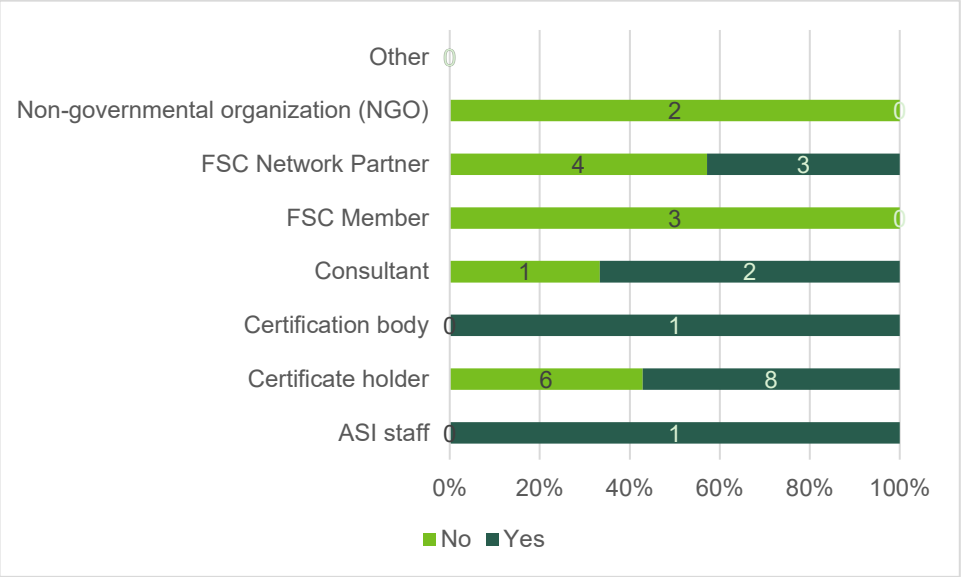


Figure 5 Response by stakeholder type for Q2

Summary of qualitative analysis

Overall, stakeholders provided mixed feedback on whether the examples of Risk Mitigation Measures (RMMs) in the database are effective in mitigating identified non-negligible risks. Several respondents supported the examples in principle and agreed that they can be effective when adapted to the national or site-specific context. Several stakeholders acknowledged the value of the database as a demonstration of mitigation logic and appreciated the intention to strengthen due diligence and risk mitigation approaches. The chi-square analysis identified a statistically significant association between respondents' country and their assessment of the mitigation measures ($p = 0.042$), while no significant association was observed for stakeholder type. This suggests that responses differed across national contexts, although the consultation comments indicate that many respondents evaluated the examples against their own national circumstances rather than solely against the source Risk Assessment.

Some respondents stated that the RMMs are overly detailed, prescriptive, and administratively burdensome, particularly in contexts involving smallholders, complex supply chains, or rapid timber procurement systems. Stakeholders comments also stressed that the effectiveness of mitigation measures cannot be assessed independently from national legal frameworks, enforcement systems, and local risk conditions.

Key theme	Summary of Comments	FSC Response
Practicality, feasibility, and administrative burden of RMMs	Stakeholders commented that many mitigation measures are overly detailed, exhaustive, and difficult to implement in practice. Concerns were raised that some RMMs create unnecessary administrative burden without improving risk mitigation outcomes, particularly in contexts involving smallholders, fast-moving procurement systems, or fragmented supply chains. Several comments emphasized that mitigation measures should focus on ensuring compliance and outcomes rather than prescribing extensive procedural steps. Stakeholders also warned that overly burdensome requirements could reduce participation in the FSC system.	Under FSC-PRO-60-006b Clause 14.1, mitigation measures must, when implemented, be expected to reduce the risk from 'non-negligible' to 'negligible'. FSC interprets this to require that mitigation effort be calibrated to the criticality of the underlying risk as documented in the source Risk Assessment- with lower-burden verifiers preferred where they provide adequate assurance, and escalation justified by the nature of the risk. FSC will review the 28 examples against this principle before publication and will address any internal inconsistencies.
Need for stronger alignment with national and local context	Many respondents stated that it is difficult to assess the effectiveness of mitigation measures without understanding the national context and local risk conditions. Stakeholders emphasized that RMMs should reflect national legal systems, enforcement structures, operational realities, and regional forest management practices. Several comments suggested that examples should be adaptable to country-specific circumstances rather than applied uniformly across all contexts.	FSC acknowledges the stakeholders' suggestion and we have added a User Guidance section to the database covering the intended use of examples as logic-demonstration resources, the right of Certificate Holders under FSC-STD-40-005 Clause 4.1 to implement alternative control measures, and the expectation that examples are adapted to relevant national or sub-national context, governance conditions, supply-chain role, source type, and available evidence rather than applied verbatim.
Concerns regarding effectiveness and proportionality of mitigation measures	Stakeholders questioned whether some proposed mitigation measures are proportionate to the identified risks or effective in achieving the intended outcomes. Several comments noted that some examples appear excessive, unrealistic, or not targeted to the actual source of risk. Others requested greater flexibility in acceptable evidence and more focus on demonstrating due diligence and legal compliance rather than requiring exhaustive documentation in all cases.	FSC reviewed the examples to ensure that the intensity, verifier mix and implementation pathway are proportionate to the documented risk context, the organization's role in the supply chain and the available evidence, and to address identified inconsistencies in calibration between examples. Some responses assessed the examples from the operating perspective of the respondents' context rather than against the documented risk profile of the source Risk Assessment. This is partly a respondent reading and partly an FSC communication issue that the revised framing will address. FSC will improve source-context

		explanations and has clarified in the User guidance that examples are not applied verbatim.
Concerns regarding HCV-related mitigation measures and protection thresholds	Multiple stakeholders stated that mitigation measures related to High Conservation Values (HCVs) lack sufficiently clear criteria and thresholds to facilitate the identification of HCVs in practice. Concerns focused particularly on HCV 1 and HCV 3examples, where respondents argued that current measures could still allow damaging activities or fail to identify important values. Several comments recommended stronger consultation requirements, clearer thresholds, and reliance on best practices rather than minimum measures.	FSC will improve HCV-related guidance by clarifying thresholds and expectations and signposting where national HCV frameworks under FSC-PRO-60-006b Clause 15 are the authoritative reference. FSC will specifically review HCV1, HCV3 examples, clarify thresholds, and align with FSC-PRO-60-006b Clause 1f5 frameworks. FSC clarifies that HCV identification must be based on the applicable national or regional Risk Assessment and HCV framework under FSC-PRO-60-006b, which define the authoritative identification criteria. To improve implementation clarity, FSC has added a harmonised Application Note (for the purpose of the RMM database, to support the interpretation of the RMM example) for HCV examples to specify identification criteria and evidence requirements, including a practical screening step: checking whether sourcing areas overlap with or are likely to contain HCVs identified in the in the applicable Risk Assessment or HCV framework, using best available data and applying a precautionary approach where information is insufficient.

Q3: Do you consider the proposed mitigation measures proportionate to the risk criticality? If no, please indicate the example code and risk mitigation measure referenced in the database, and explain why the mitigation measures may not be proportionate.

Summary of quantitative analysis

In total, 32 answered this question. 10 answered “yes” and 22 answered “no”.

Response by stakeholder type

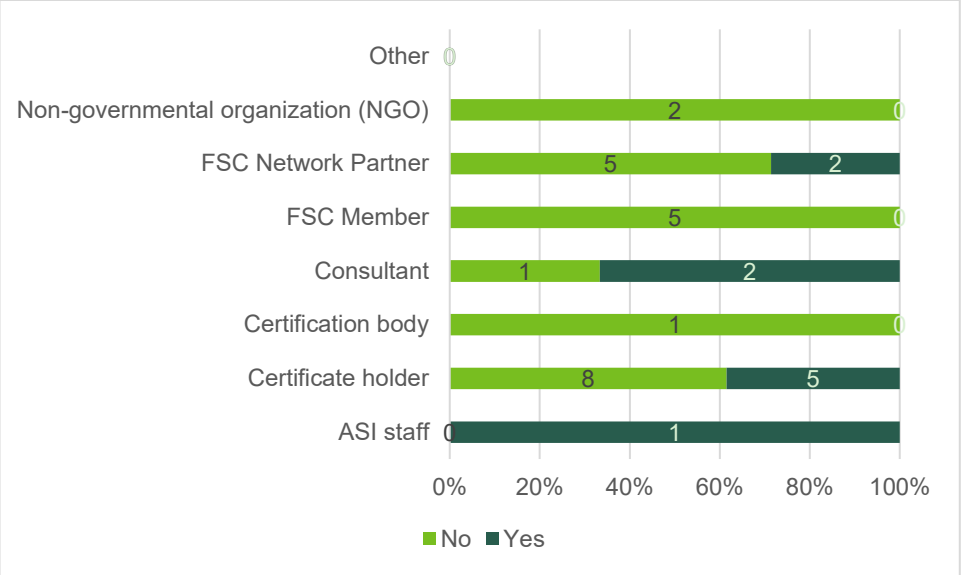


Figure 6 Response by stakeholder type for Q3

Summary of qualitative analysis

Stakeholders provided extensive feedback on the proposed introduction of risk criticality levels (High, Moderate, Low) and their linkage to risk mitigation measures (RMMs). Overall, there is broad conceptual support for introducing risk criticality to guide proportionate mitigation measures. However, the feedback consistently highlights significant concerns regarding clarity of definitions of risk criticality, consistency of application, proportionality of mitigation measures in relation to risk criticality and the measures’ practical feasibility. Statistical analysis (chi-square test) did not identify a country or a stakeholder effect on this question ($p = 0.312$). The most common concern was that there is insufficient differentiation between mitigation expectations for low-, moderate-, and high-criticality risks, resulting in a “one-size-fits-all” approach that does not adequately account for national context. Stakeholders repeatedly noted that risks considered significant in one country may not represent the same level of concern elsewhere and emphasized the need for clearer definitions, stronger calibration, and more context-sensitive application of the risk criticality framework.

At the same time, several stakeholders expressed positive support for the introduction of the “risk criticality” concept itself, recognizing its potential value in helping scale mitigation measures according to the severity and significance of risks. Stakeholders noted that introducing a criticality factor could help improve proportionality and prioritize mitigation efforts more effectively if implemented consistently and transparently. However, many stakeholders stressed that the current application does not yet clearly demonstrate how risk criticality levels influence the intensity of mitigation measures in practice.

Table below summarizes the key feedback from participants, grouped into categories and corresponding responses

Key theme	Summary of comments	FSC response
Unclear definitions, calibration, and methodology for risk criticality	Stakeholders indicated that the definitions of “High,” “Moderate,” and “Low” criticality are unclear and difficult to interpret consistently and asked for clearer criteria, and definition of how criticality levels are assigned and calibrated. There was uncertainty around definition of “international and persistent attention,” and highlighted Example code 1 where the assigned level did not appear aligned with the perceived risk severity	FSC acknowledges the stakeholder concern and recognizes that this information was not elaborated in the previous version. In the Version 1-1, we have added a new User Guidance section and a Risk Criticality and RMM Proportionality section within, articulating FSC’s interpretation of the calibration principles in line with FSC-PRO-60-006b Section 14 and FSC-STD-40-005, to clarify the methodology, definitions, and calibration criteria used to assign risk criticality levels for consistent interpretation across contexts.
Lack of proportionality and differentiation between risk levels and RMMs	Stakeholders observed that the proposed RMMs often appear similarly intensive regardless of criticality. Comments requested a clearer escalation in mitigation expectations between criticality levels and noted that some low or moderate risks appear to require measures more appropriate for high criticality risks. Specifically referenced examples include- Example code 12 (indicator 22) and Example code 14 (indicator 23). Additionally, stakeholders cited Example code 11 (indicator 21) and suggested reviewing its risk criticality.	FSC reviewed the cited examples to ensure that the intensity, verifier mix and implementation pathway are proportionate to the documented risk context, the organization’s role in the supply chain and the available evidence, and to address identified inconsistencies in calibration between examples. FSC confirms that RMMs have been reassessed to ensure they are proportionate to the documented risk context, the organization’s role in the supply chain, and the available evidence. Adjustments were made where inconsistencies in calibration were identified. For Example code 12 (Indicator 22), the risk criticality classification has been revised to "High" based on the severity, persistence, systemic nature, documented enforcement weaknesses, and the potential for serious injury or fatality of forest workers. Example code 11 (Indicator 21) has been removed from the database of examples, as the risk conclusion was updated to "negligible risk" in the source Risk Assessment, and hence it no longer constitutes an example for a non-negligible risk
Need for stronger consideration of national and regional context	Stakeholders emphasized that risk criticality vary significantly across countries and regions, and that a risk considered high in one context may not represent the same level of concern elsewhere. And hence cautioned against applying a uniform approach globally and suggested that national realities, legal frameworks and localized risk conditions be better reflected in the classification of criticality and the design of mitigation measures.	FSC has added a section on Context-specific Application in the User Guidance tab, clarifying that the same risk criticality may warrant different mitigation in different countries, depending on governance context, legal framework, and operational realities.

Governance and consistency	Respondents supported the concept of introducing criticality to scale mitigation requirements, but many questioned how it fits within the broader FSC risk assessment framework. Some expressed concern that introducing a criticality classification outside approved risk assessments could create confusion regarding normative requirements. Others warned that labels such as "Moderate" or "Low" could unintentionally lead to weaker treatment of important risks, including HCV-related risks. Some respondents questioned whether risk criticality assessments are consistently calibrated across examples, citing Example codes 2 (indicator 4) and 5 (indicator 10).	FSC acknowledges stakeholder concern of confusion of non-normative term “risk criticality” versus normative binary risk “negligible/non-negligible”. To address this FSC has added a User Guidance and clarified that Risk Criticality is intended as an informative calibration label to support consistency and proportionality when developing RMMs. The normative risk conclusion remains negligible or non-negligible; Risk criticality is the informative calibration label. FSC has verified the risk contexts of Example codes 2 and 5 and revised the criticality assessment of Example code 2 from “Moderate” to “High” owing to the severity, persistence, systemic nature, documented enforcement weaknesses of the identified risk. HCV3 example has been reclassified to "Moderate" criticality from the previous “Low” criticality owing to the severity of threat to HCV3.

Q4: Are any mitigation measures not practical or particularly difficult for sourcing organizations to implement? If yes, please indicate the example code and risk mitigation measure referenced in the database, and describe the challenge.

Summary of quantitative analysis

In total, 29 respondents answered this question. 24 answered “yes” and 5 answered “no”. This indicates a strong overall majority of respondents perceiving practical implementation challenges with the proposed mitigation measures.

Response by stakeholder type

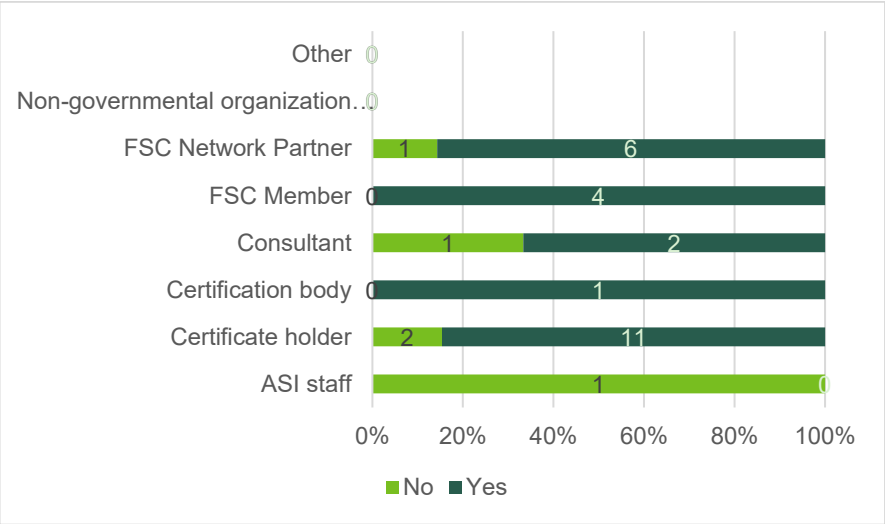


Figure 7 Response by stakeholder type for Q4

Summary of qualitative analysis

The was mixed feedback on whether the proposed Risk Mitigation Measures (RMMs) are practical for sourcing organizations to implement. Many respondents considered the measures to be detailed, costly, and difficult to apply in practice, especially in smallholder settings, fragmented supply chains, and fast-moving timber markets. A common concern was that some RMMs resemble forest management audit requirements rather than practical sourcing controls. Many stakeholders emphasized that implementation feasibility depends on national context, legal systems, ownership structures, and operational realities. Some respondents noted that sourcing organizations may not have direct access to suppliers, staff, or long-term monitoring information needed to implement certain measures. Others raised concerns about unclear evidence requirements and use of media sources and social requirements consistently across contexts.

Statistical analysis (chi-square test) identified a significant country effect on this question ($p = 0.012$) and no significant stakeholder-type effect, indicating that RMM’s practicality was evaluated primarily against respondents' own national context rather than against the documented source-RA risk.

Key theme	Summary of Comments	FSC Response
Excessive documentation and reporting burden	Several respondents stated the RMMs are very country-specific and that documentation and reporting requirements are defined at such a detailed level that practical implementation is significantly affected, creating high administrative and cost burden. Frequently cited examples included Example code 14 (Indicator 23), where training and reporting requirements were considered excessively detailed and administratively burdensome; Example code 10 (Indicator 16), where respondents questioned requirements to provide evidence of the absence of threatened species following an assessment.	FSC acknowledges concerns regarding the country-specific nature of many examples. To address this, FSC has replaced the former country column in the database with a risk contextual statement describing the regulatory and forest-management context addressed by each example, while retaining country traceability internally for annual review purposes. FSC has added a user guidance that further clarifies that Certificate Holders may implement alternative control measures in accordance with FSC-STD-40-005 Clause 4.1. FSC has reviewed the referenced examples and revised them. FSC has conducted a calibration pass on all the database examples. Example code 10, The RMM for Indicator 16 has been clarified to allow reliance on competent regulatory-agency assessments, official species records, biodiversity databases and protected-area information where these are current and applicable. Additional supplier-level assessment is only conducted where official information is insufficient, outdated or inconsistent. RMM for indicator 23, the proposed RMMs are independent mitigation measures rather than cumulative requirements. Sourcing organizations may implement one or more relevant and proportionate measures, provided that the selected measure or combination of measures gives adequate assurance.
Mitigation measures do not fit real supply-chain conditions	Stakeholders said some measures assume that sourcing organizations have direct control over suppliers, access to staff, or ability to conduct checks before harvest, which is often not realistic. Example codes 4, 5, 13, 15 were referenced that requirements related to wage data, gender equality, and supplier staff interviews may be difficult to implement, especially for small suppliers or independent forest owners. Example codes 4, 5, and 13, which rely on access to supplier documentation and personnel that sourcing organizations may not be able to obtain. Concerns	FSC has reviewed the referenced examples to better reflect the supply chain role differentiation. Each example now includes an application note on why a verifier combination was used, where supply chain role differentiation matters and when conditional triggers apply. For Example codes 4,5,13 we have revised the RMM to clarify that staff interviews as conditional verification triggered by risk signals rather than a default requirement. For downstream actors, the measures allow reliance on documented H&S systems, audit results, corrective-action records, and grievance or reporting mechanisms where adequate. FSC acknowledges stakeholder

	were also raised regarding access to wage and gender-related information under Example code 15 (Indicator 41). Overall, respondents noted that sourcing organizations often lack authority or practical means to collect the level of evidence required in the recommended measures.	concerns that obtaining gender- and wage-related data under Example code 15 (Indicator 41) may be challenging for sourcing organizations due to confidentiality, legal restrictions, and data protection requirements. FSC clarifies that sourcing organizations are not expected to obtain individual wage records or unrestricted personal employee data. Evidence requirements should be proportionate and respect applicable legal and confidentiality constraints. Acceptable evidence may include aggregated or anonymized gender-disaggregated workforce information, relevant policies and procedures, grievance and corrective-action records, labor authority findings, collective bargaining agreements, and credible third-party assurance. Access to interviews or sensitive records should be applied only where legally permissible, practicable, and proportionate to the risk context. Where specific evidence types are not available due to confidentiality or data protection limitations, adequate credible alternative evidence may be used to demonstrate conformance. This approach applies consistently across Example code 15 (Indicator 41) and Example codes 4, 5, and 13.
Alignment, Scope, and Clarity of Mitigation Measures	Some stakeholders said it is unclear what evidence sources, databases, or verification methods are acceptable, specifically referenced example was Example code 9 on the lack of clarity of what “relevant database” refers to.	FSC acknowledges the need for clarity. FSC-PRO-60-006b requires objective and reliable evidence to support risk mitigation. On the lack of clarity of databases to be consulted and particularly for Example code 9, FSC had added an Application Note to clarify that the term “recognized scientific sources and biodiversity databases” may include national conservation databases, official habitat inventories, protected area registries, forest management planning systems, or internationally recognized biodiversity information systems, as applicable to the sourcing context

Q5: Are there any mitigation measures that are overly burdensome or disproportionate to the level of risk or the organization's role in the supply chain? If yes, please indicate the example code and risk mitigation measure referenced in the database, and explain your concerns.

Summary of quantitative analysis

In total, 29 respondents answered this question. 21 answered "yes" and 8 answered "no".

Response by stakeholder type

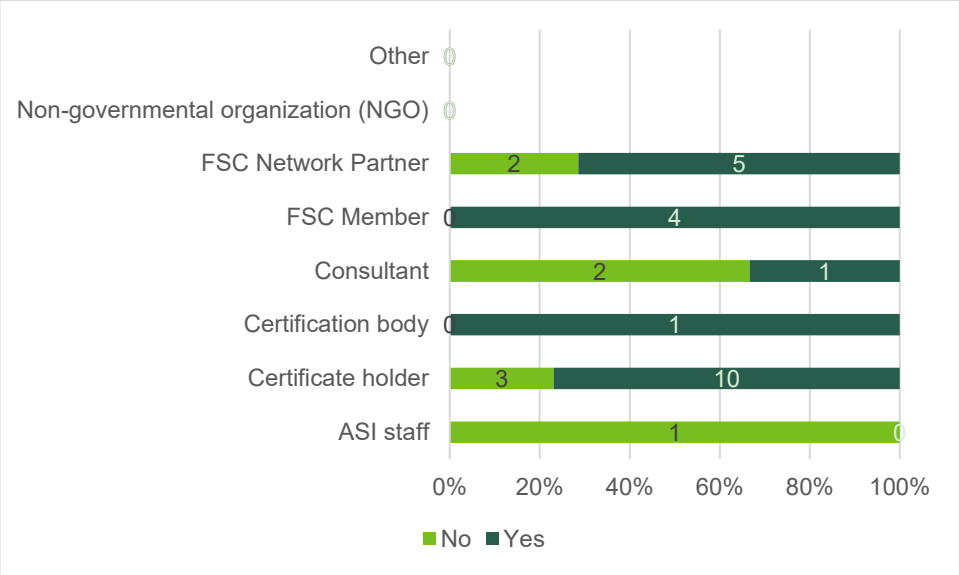


Figure 8 Response by stakeholder type for Q5

Summary of qualitative analysis

Most stakeholders who responded to this question considered several proposed RMMs to be overly burdensome or disproportionate to the level of risk and the role of sourcing organizations in the supply chain. A recurring concern was that many RMMs require a level of control, monitoring, documentation, and verification that may be appropriate for FM certification, but not for controlled wood sourcing organizations, especially where organizations are removed from the forest of origin.

Many respondents emphasized that the level of effort required often does not appear aligned with the assigned risk criticality, particularly for low- and moderate-risk situations. Several comments highlighted concerns about increased administrative burden, high implementation costs, and unrealistic expectations regarding supplier oversight and field verification. Comments overlapped with those in Q3 and Q4. Some stakeholders also noted that scale and sourcing context are not sufficiently considered, especially for smallholders, low-volume sourcing, or fragmented supply chains.

Key theme	Summary of Comments	FSC Response
Lack of Proportionality to Risk, Scale and Context	Many stakeholders expressed concern that the proposed RMMs do not adequately scale with risk criticality, sourcing context, or operational scale. Respondents felt that similar levels of requirements are applied across low, moderate, and high-risk criticality, resulting in measures that are not proportionate to actual risk. Example code 11 (Indicator 21) was referenced multiple times as requiring field inspections that respondents viewed as costly and excessive, particularly for low-volume purchases and moderate-risk situations. In addition, stakeholders noted that sourcing from “small private land parcels where risk is low,” still requires compliance with detailed requirements	FSC acknowledges the concern. As per FSC-PRO-60-006b, mitigation measures are to be effective, proportionate, and aligned with the identified risk. FSC will review whether the referenced examples better demonstrate scaling of mitigation efforts according to risk criticality, sourcing context, and the role of sourcing organizations. FSC has added a User Guidance section will present different verifier options for direct-access and downstream actors where relevant. Formerly example code 11 which was indicator 21 RMM example has been removed from the V1.0 of RMM database because the risk conclusion for the indicator 21 has changed to negligible risk in the specific source Risk Assessment.
Operational Burden (Administrative, Documentation and Cost)	Respondents highlighted increased administrative effort, cost, and documentation requirements associated with implementation of the RMMs. Some noted that timber is often sourced at short notice (e.g. roadside or merchant yard purchases), which can limit the ability to collect extensive documentation in advance. Example code 8 (hiring forester to verify site conditions) was associated with additional cost and logistical requirements. Example code 11 was again noted as increasing cost and workload, particularly in low-volume sourcing situations. Supplier-provided HCV assessments (Examples 23-26) were also described as burdensome, particularly for small forest owners where such assessments are not standardized.	FSC recognizes that sourcing organizations operate in different supply-chain contexts and may have different levels of control or access to information. While primary producers may have direct access to forest-level verification opportunities, downstream producers may reasonably rely on alternative forms of evidence, including supplier documentation, contractual commitments, due diligence systems, third-party assurance mechanisms, public authority information, and other indirect verification approaches. The database examples should not be interpreted as requiring unrestricted access to supplier personnel, confidential information, or internal systems where such access is not reasonably available, commercially appropriate, or legally permissible. FSC has added information on RMM feasibility and supply-chain role differentiation in the User Guidance. For Example code 8, the recommendation was requirement to engage professional foresters or technical experts should be applied flexibly appropriately and only where justified by the level of identified risk, operational complexity, or insufficient available evidence. On-site audits and stakeholder consultations are intended to be conditional and risk-based measures triggered by inconsistencies or unresolved non-compliances. HCV examples have been reviewed and clarified that assessment may be required where evidence is insufficient, but should not be the default pathway for all suppliers

Q6: Are any proposed mitigation measures not feasible for organizations without direct forest access (e.g., traders or downstream processors)? If no, please indicate the example code and risk mitigation measure referenced in the database, and describe any gaps or unrealistic expectations.

Summary of quantitative analysis

In total, 25 respondents answered this question. 19 answered “yes” and 6 answered “no”.

Response by stakeholder type

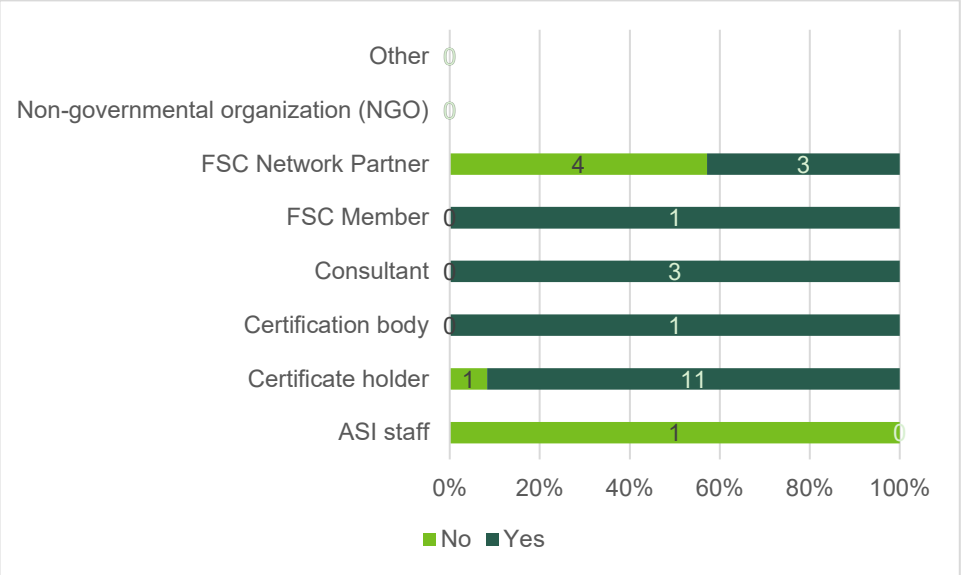


Figure 9 Response by stakeholder type for Q6

Summary of qualitative analysis

Findings provided mixed feedback on whether the proposed Risk Mitigation Measures (RMMs) are feasible for organizations without direct forest access, such as traders and downstream processors. Many respondents considered several RMMs difficult or unrealistic for organizations that do not control forest operations, have limited supplier access, or operate several steps removed from the forest of origin. A recurring concern was that some mitigation measures require levels of field verification, supplier oversight, technical expertise, and operational access that downstream organizations may not realistically have. Several stakeholders also highlighted inconsistencies between requirements for organizations with direct forest access and those without direct forest access. Some respondents questioned why more extensive mitigation requirements would apply to organizations with direct forest access when both organization types are mitigating the same risk. Others noted that, in practice, many timber transactions occur post-harvest or “at roadside,” making several forest-level mitigation measures impractical or irrelevant for downstream sourcing organizations.

Statistical analysis (chi-square test) identified a significant country effect on this question ($p = 0.022$) and no significant stakeholder-type effect, indicating that RMM’s feasibility for sourcing organizations was evaluated primarily against respondents' own national context rather than against the identified risk.

Some stakeholders suggested that mitigation measures for downstream organizations should rely more on supplier-provided documentation, existing due diligence systems, transport and harvesting permits, and document-based verification approaches rather than direct forest-level controls.

Key theme	Summary of Comments	FSC Response
RMMs require forest-level control that downstream organizations do not have	Many stakeholders said downstream organizations cannot realistically conduct field inspections, ecological assessments, or supplier-level enforcement because they lack direct access to forests and harvesting operations. Concerns were raised that some measures require specialist knowledge or operational control beyond their role. Suggestions included relying more on supplier documentation, permits, and risk-based due diligence rather than forest-level verification. Concerns were raised regarding access to documentation under Example code 4, obtaining information relating to corruption risks under Example code 5.	FSC recognizes that downstream organizations have limited direct control over forest operations. As per PRO-60-006b, mitigation measures to be adapted to the role and position in the supply chain, provided they remain effective and risk-based. FSC has reviewed the referenced Example code 4 to clarify alternative verification approaches. For Example code 5, FSC clarifies that the example presents independent measures. Direct interviews with supplier staff are to be used only where credible risk signals, inconsistencies, or allegations of corruption are identified through other sources. In this risk context, there are documented cases of corruption despite the legal requirements and control procedures. FSC has conducted a calibration pass on the database examples to present different verifier options for direct-access and downstream actors where relevant.
Perceived imbalance between mitigation efforts for primary and downstream organizations.	Some stakeholders said there is inconsistency in requirements between organizations with direct forest access and those without. They questioned why upstream actors may face more extensive mitigation requirements while downstream actors rely mainly on documentation, suggesting a need for clearer justification and consistency across organization types, citing Example code 12 where organizations without direct forest access may rely on supplier-provided documentation, while organizations with direct forest access are expected to undertake more extensive verification activities to address the same risk.	FSC acknowledges the concern regarding consistency across organization types. As per PRO-60-006b Clause 14.4 RMMs should remain feasible, auditable, and proportionate to the sourcing organization's role and position within the supply chain. While primary producers may have direct access to forest-level verification opportunities, downstream producers may reasonably rely on alternative forms of evidence, including supplier documentation, contractual commitments, due diligence systems, third-party assurance mechanisms, public authority information, and other indirect verification approaches. The database examples should not be interpreted as requiring unrestricted access to supplier personnel, confidential information, or internal systems where such access is not reasonably available, commercially appropriate, or legally permissible. FSC has added information on RMM feasibility and supply-chain role differentiation in the User Guidance.
Excessive complexity and burden across long supply chains	Stakeholders highlighted that some RMMs generate excessive documentation and information requirements, particularly across long or fragmented supply chains. Concerns included unrealistic expectations for procurement staff, lack of ecological expertise at downstream level, and impracticality of implementing detailed assessments across multiple intermediaries. Suggestions included simplifying requirements and focusing on practical due diligence tools.	FSC reviewed the cited examples and revised the User Guidance and relevant RMMs to clarify practical evidence pathways for downstream actors. Any further example-specific feasibility issues will be addressed in the subsequent database review cycle, The required mitigation outcome for primary and downstream processors remains the same; only the feasible evidence pathway may differ according to access, control and supply-chain role.

Q7: Are there other barriers or challenges that may affect the implementation or effectiveness of the proposed mitigation measures? If yes, please describe the challenge and indicate the relevant example number code and risk mitigation measure where possible.

Summary of quantitative analysis

In total, 28 respondents answered this question. 20 answered “yes” and 8 answered “no”. This question received substantial feedback.

Response by stakeholder type

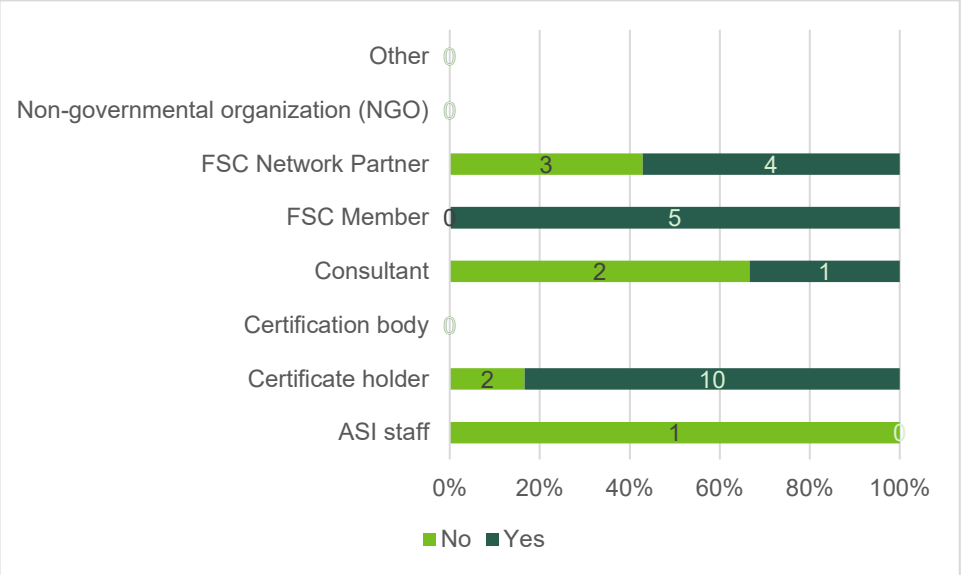


Figure 10 Response by stakeholder type for Q7

Summary of qualitative analysis

Stakeholders identified barriers affecting the implementation and effectiveness of the proposed RMMs, with recurring concerns about the need for greater flexibility to reflect national legislation and established practices, and to avoid duplication where these already achieve the intended mitigation outcome. Many respondents also highlighted practical feasibility and proportionality issues, noting that requirements such as extensive documentation, training, database checks, and field verification can be costly, or unrealistic, particularly for small and medium-sized organizations and fragmented supply chains. Additional concerns relate to limited access to supplier information due to confidentiality, privacy restrictions, or lack of availability, which may constrain verification.

Key theme	Summary of comments	FSC response
Flexibility and National Adaptation of RMMs	Stakeholders emphasized that RMMs should allow adaptation to national contexts and existing legal frameworks. Example Example code 1: concern that requiring consultation with at least three stakeholders to verify conflict resolution is overly prescriptive and may not suit local realities. Example code 16: fixed requirement to review conflict-related media reports over a 12-month period is considered too rigid. Example code 7: requirements to review compliance databases, court records, or similar sources may be impractical in countries with many smallholders or where equivalent legal controls already exist. Several respondents stated that compliance with existing legislation or established national procedures should be accepted as sufficient evidence for CB audit.	FSC acknowledges the need for consistency while accommodating different legal and operational contexts. To address this, FSC has added User Guidance clarifying that examples are intended to demonstrate mitigation logic and should be adapted to national circumstances and not verbatim. FSC has also replaced the former country column in the database with a risk contextual statement describing the regulatory and forest-management context addressed by each example, while retaining country traceability internally for annual review purposes. The user guidance further clarifies that Certificate Holders may implement alternative control measures in accordance with FSC-STD-40-005 Clause 4.1.
Cost, Capacity, and Implementation Burden	Stakeholders expressed concern that some RMMs may be costly and difficult to implement, especially for SMEs, smallholders, and complex supply chains. Example codes 5 and 6: training and awareness-raising requirements (e.g., anti-corruption training and harvesting technology training) may create significant costs and logistical burdens especially for small operators. Example code 11: biodiversity monitoring and verification requirements may exceed the capabilities of certificate holders operating in large, diverse supply chains.	As per PRO-60-006b Clause 14.4 RMMs should remain feasible, auditable, and proportionate to the sourcing organization's role and position within the supply chain. FSC clarifies that organization size alone should not determine proportionality. For Example codes 5 and 6, training and awareness-raising measures (e.g., anti-corruption and harvesting technology training) should be applied where a competence gap contributes to the identified risk, and scaled according to the risk level, supply-chain role, sourcing complexity, existing competence, and availability of suitable sectoral or third-party training. Training is not required to be a bespoke programme. Acceptable evidence may include documented competence, existing sector training, awareness materials, supplier procedures, external training, recognised qualifications, or targeted briefings. For Example code 11, FSC will also review biodiversity monitoring and verification requirements to ensure they remain proportionate and practicable across diverse and complex supply chains while maintaining risk-based effectiveness.
Access to Information and Verification Challenges	Stakeholders questioned the feasibility of obtaining information required by some RMMs. Example code 5: reviewing reports from authorities on harvesting and	FSC acknowledges the concern. RMM examples do not require unlawful disclosure of personal or confidential information; individual-level HR and wage data are not the default evidence; aggregated, anonymized, redacted, authority-derived or third-party

	transportation irregularities may not be possible where records are unavailable or inaccessible. Example code 7: access to compliance databases and legal records may be difficult in contexts with fragmented ownership structures. Example codes 12, 13, and 15: verification of health and safety, gender equality, and related records may be restricted by confidentiality and privacy legislation. Stakeholders also noted that certificate holders may lack authority to interview supplier staff or access	evidence may be used where it provides adequate assurance; and access to supplier staff is conditional on practical access, legal permissibility and unresolved risk signals. FSC has reviewed the Example codes 5, 7, 12, 13 and 15 to clarify acceptable evidence sources, alternative verification methods, and circumstances where information may not be reasonably accessible due to confidentiality, privacy, or legal constraints.

Q8: Are any verification aspects of the proposed mitigation measures unclear or difficult to audit? If yes, please indicate the example number code and risk mitigation measure referenced in the database, and explain why.

Summary of quantitative analysis

In total, 25 respondents answered this question. 15 answered “yes” and 10 answered “no”.

Response by stakeholder type

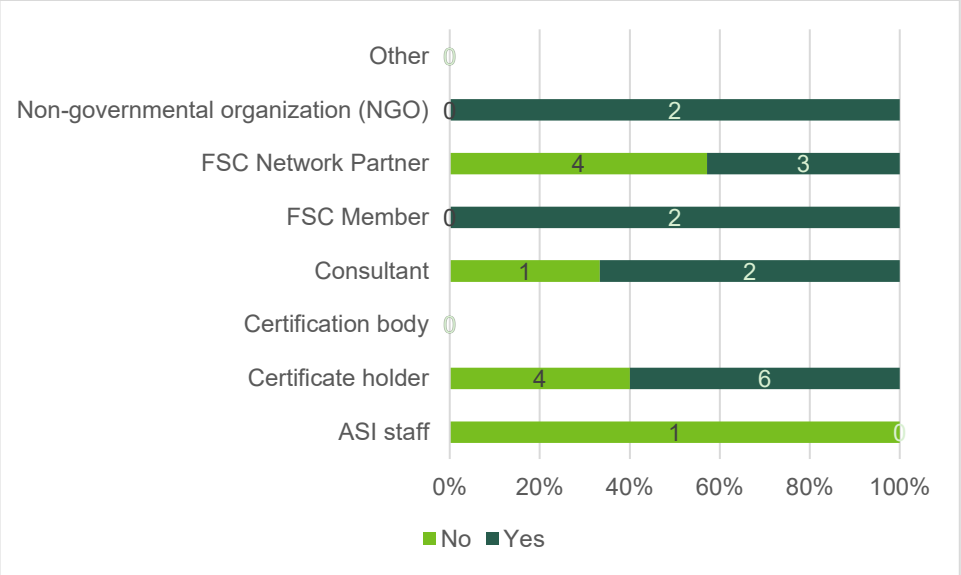


Figure 11 Response by stakeholder type for Q

Summary of qualitative analysis

Stakeholders noted issue in uncertainty for certification bodies on how to interpret requirements and apply consistent audit approaches, especially whether field verification (conducted by CH) is required to be repeated by CBs audits. Respondents also highlighted challenges in auditing sensitive or restricted information such as wage or gender-related data (Example code 15) and reliance on supplier staff interviews for corruption-related indicator (Example code 5). In addition, unclear terminology and evidence expectations (Example code 24) and lack of standardized criteria and thresholds, particularly for HCV-related measures were seen as limiting consistent implementation. Overall, stakeholders emphasized the need for clearer auditability, more defined verification thresholds, and more consistent and practical evidence requirements.

Key theme	Summary of comments	FSC response
Unclear verification expectations	Stakeholders raised concerns that several verification requirements were insufficiently defined, making implementation and auditing inconsistent. Respondents questioned what constitutes an “inconclusive” document check requiring field verification (Example code 4), and whether certain RMMs automatically trigger field verification obligations under FSC-STD-20-011. Concerns were also raised regarding unclear escalation thresholds and undefined evidence expectations.	. The RMM Database does not create a one-for-one requirement for a certification body to repeat every field-verification activity undertaken by the certificate holder. However, the certification body remains independently responsible for the field verification and sampling required under FSC-STD-20-011 to evaluate whether the organization’s DDS and control measures are effectively implemented. The certification body determines the scope and sample under the applicable audit requirements; these activities need not duplicate the certificate holder’s verification work.” Also replace “drawn from a non-independent source” with “where the evidence lacks sufficient reliability, corroboration, currency or relevance to provide reasonable confidence in the mitigation outcome.
Unclear auditability	Stakeholders questioned how auditors should verify sensitive information such as wage data, HR records, or corruption-related issues (Example codes 5 and 15). For Example code 15 (indicator 41), respondents highlighted that wage and gender related data may not be possible to gain access, especially for smaller organizations. For Example code 5 (Indicator 10), respondents questioned how supplier internal interviews can be crucial in detecting corruption.	FSC reviewed the cited examples involving corruption controls and sensitive employment information. Under Example code 5, staff interviews are conditional and triggered by credible risk signals or inconsistencies identified through other evidence. Example code 15 permits aggregated or anonymized information and other credible evidence where access to sensitive records is restricted. The relevant Application Notes clarify alternative evidence pathways and that direct access to supplier personnel or confidential records is not a default requirement
HCV verification challenges	Several respondents highlighted concerns regarding HCV-related verification requirements, including the absence of clearly defined national criteria, thresholds, and methodologies for identifying and assessing HCV impacts. Stakeholders noted that without nationally aligned guidance, implementation and auditing outcomes could vary significantly across certificate holders and certification bodies.	FSC acknowledges stakeholder concerns regarding inconsistent HCV verification approaches due to the absence of clearly harmonized national criteria, methodologies, and evidence requirements, which may lead to variation in implementation and audit outcomes. FSC clarifies that HCV identification should be based on the applicable national or regional Risk Assessment and HCV framework under FSC-PRO-60-006b Clause 15, which provides the authoritative identification criteria and evidence requirements. To improve consistency, FSC developed a harmonized Application Note for HCV examples to clarify identification criteria and evidence and align interpretation. This includes a standard screening step based on best available information and application of the precautionary approach where data is insufficient and will support consistent implementation across HCV examples.

Q9: Do you have examples of workable Risk Mitigation Measures (RMMs) for the RA indicators and/or types of risk that are not currently covered in the database? If yes, please add them below, and specify the relevant risk indicator, source type and risk mitigation measure. Where possible, please differentiate mitigation measures according to primary processors and downstream processors to ensure practical applicability across the supply chain.

Summary of quantitative analysis

10 respondents answered “yes” and 15 respondents answered "no”. 9 respondents provided feedback on workable Risk Mitigation Measures (RMMs).

Summary of qualitative analysis

Most respondents either indicated that they had no additional examples of workable Risk Mitigation Measures (RMMs) or did not provide detailed comments. Among those who did provide feedback, stakeholders generally emphasized the importance of ensuring that mitigation measures are practical, proportionate, and adaptable to different sourcing situations. Several respondents highlighted the value of using existing systems, national frameworks, mapping tools, and procurement controls to reduce duplication and improve implementation efficiency.

A smaller number of stakeholders, particularly from Sweden, provided proposal for a risk context and feedback on High Conservation Values (HCVs). These comments emphasized stronger field-based assessments, precautionary approaches, and the use of qualified expertise and spatial data tools to support risk mitigation.

Key theme	Summary of comments	FSC Response
Recognition of existing systems, standards and due diligence frameworks	Stakeholders suggested that workable risk mitigation measures are already contained within existing approved FSC National Risk Assessments and procedures established within national forest management standards. Swedish stakeholders considered that the RMMs currently used in Sweden are working well. USA stakeholders highlighted a sustainability initiative as an effective, accepted and practical model for wood sourcing in the context of USA. Stakeholders also asked how compliance with the EU Deforestation Regulation (EUDR) could be leveraged to avoid duplication of effort when implementing risk mitigation requirements.	FSC-approved country risk assessments remain the operative reference for risk mitigation measures. Existing national systems, standards and due diligence frameworks may be considered where they effectively mitigate identified risks. A sustainability initiative or other assurance mechanism may contribute evidence where it is credible, current, relevant in scope and addresses the specific FSC-identified risk. Acceptance remains case-specific and does not constitute general FSC endorsement. EUDR-related evidence may reduce duplication where it addresses the same information or verification need, but EUDR compliance does not automatically demonstrate that every FSC Controlled Wood risk has been reduced to negligible risk.
Risk-based and proportionate application of mitigation measures	Stakeholders suggested that a policy not to source wood from certain high-risk areas could be an effective risk mitigation measure. Same stakeholder questioned whether different supply-chain actors should be subject to the same RMMs.	FSC clarifies that a general "do not buy" policy is not considered an appropriate Risk Management Measure (RMM), except in exceptional circumstances where no other effective mitigation is possible (e.g. where risk cannot be assessed or mitigated due to a lack of government control). Accordingly, it will not be included as a generic RMM in the database. Similarly, sourcing only certified material ("buy certified") should only be used where no other effective mitigation measures can be identified. These principles are aligned with the FSC Risk Assessment Framework and reflected in the RA supporting Q&A guidance. As per FSC-PRO-60-006b Section 14, RMMs should be proportionate to the sourcing organization's role and position in the supply chain, ensuring that risk mitigation is both effective and practical for different actors. The required mitigation outcome for primary and downstream processors remains the same; only the feasible evidence pathway may differ according to access, control and supply-chain role.

Long-term validity of risk assessment evidence	Stakeholders suggested that where certificate holders maintain long-term sourcing relationships with the same forest owner or manager, risk assessment evidence and verifiers could remain valid for a defined period (e.g. 12–24 months), subject to confirmation that relevant conditions have not changed. Respondents noted that this could reduce administrative burden and costs while maintaining assurance through periodic review, change notifications, and reassessment in cases such as ownership changes.	FSC acknowledges the proposal. The database will not prescribe a universal validity period for mitigation evidence. Evidence may continue to be relied upon only while it remains current, relevant and reliable, subject to the applicable DDS review requirements and documented confirmation that no material change has occurred. Reassessment is required when relevant conditions or risk information change. A fixed validity period is not proposed for Version 1.0 of the database.
Procurement policy as mitigation tool	Stakeholders identified procurement policies and support for worker or conservation initiatives as effective and appropriate RMMs for low-risk criticality situations, and FSC is encouraged to include examples from RA USA in the database while facilitating the exchange of additional context-appropriate RMM practices.	FSC acknowledges that a procurement policy may form part of a mitigation approach where it contains defined sourcing criteria or exclusions, implementation procedures, supplier communication, monitoring, action where non-conformity is identified, and evidence that it addresses the specific risk. A general policy statement alone would not demonstrate effective mitigation. Relevant examples from approved Risk Assessments may be considered in future database updates.
Indicator 16 (Legal requirements related to biodiversity conservation)	Stakeholders highlighted poor compliance with the Species Protection Ordinance as a key risk. Proposed mitigation measures include ensuring forest management plans document protected species and habitats; designing management activities in compliance with species protection legislation; conducting conservation value assessments by personnel with species identification expertise; and including species-related conservation measures in logging notifications submitted to authorities.	The proposed mitigation measures and stakeholder recommendation are in line with what is reflected in the source Risk Assessment and for the identified risk. We have added this RMM example to the database. In line with the objective of the database, we have improved the context specific applicability and transferability of the example while retaining the full mitigation logic of the proposed example.
Indicators 57–60 (no degradation of natural forests and HCV 1–3)	Some stakeholders proposed that mitigation measures should include the use of governmental and other databases, maps and spatial information to identify HCVs and natural forests.	FSC acknowledges the proposal that mitigation measures should include databases and spatial information to identify HCVs. This is currently effectively included in the database for indicators 59 and 60. However, the usefulness of the database depends on their reliability, resolution and relevance. Spatial information supports but does not replace risk-specific interpretation. Where HCVs may be unmapped or available information is

		incomplete, supplementary evidence or precautionary approach may be needed.
Consultation process improvement	Stakeholders requested a longer consultation process to enable more discussion on workable RMMs rather than relying on a short, targeted consultation.	FSC acknowledges the concern and will make improvements to consultation timelines and engagement depth in future revisions of the database.

Q10: Do you have alternative mitigation measures that may be more effective, practical or proportionate than those currently included? If yes, please add them below, and specify the relevant risk indicator, source type and risk mitigation measures. Where possible, please differentiate mitigation measures according to primary processors and downstream processors

Summary of quantitative analysis

In total, 12 respondents answered “yes” and provided feedback on this question, 13 respondents answered "no”.

Summary of qualitative analysis

Overall, feedback focused on improving the practicality, proportionality, and contextual adaptation of existing RMMs. The most common themes included the need for stronger incorporation of national stakeholder consultation, recognition of existing National Risk Assessments (NRAs) and due diligence systems, and more risk-based implementation approaches.

More specific operational measures were also provided, including suggestions for plot-level risk mapping, extended validity of previously verified evidence (e.g. 12 months or aligned with FSC audit cycles), acceptance of documented forest owner discussions as mitigation evidence, and inclusion of training and corrective action measures (including steep slope logging practices under Indicator 15).

Key theme	Summary of comments	FSC Response
National stakeholder consultation	Respondents emphasized that national stakeholders should be consulted and their comments on the effectiveness and implementation of the RMMs should be considered.	FSC recognizes the importance of national stakeholder engagement in risk assessment and mitigation development. This is conducted in accordance with FSC-PRO-60-006b and Consultation requirements on the draft Risk Assessments to gather stakeholder input including on effectiveness and implementation of RMMs.
Time-bound validity	Respondent proposed allowing evidence of stable conditions (e.g. absence of fixed HCVs or stable labor commitments) to remain valid for defined periods (e.g. 12 months or aligned with FSC audits). Also proposed accepting documented “discussion with forest owner” as mitigation evidence where long-term relationships exist. Other respondents cited cost burden, complexity, and legal risks.	FSC acknowledges the proposal. The database will not prescribe a universal validity period for mitigation evidence. Evidence may continue to be relied upon only while it remains current, relevant and reliable, subject to the applicable DDS review requirements and documented confirmation that no material change has occurred. Reassessment is required when relevant conditions or risk information change. A fixed validity period is not proposed for Version 1.0 of the database.
Risk-based and spatial targeting	Stakeholders proposed plot-level maps of at-risk soil types and RTE species hotspot mapping to focus mitigation on high-risk areas rather than uniform application.	FSC acknowledges the value of spatial and risk-based tools. FSC-PRO-60-006b supports use of best available information and requires risk mitigation proportionate to identified risks.
Existing NRA	The NRA for Canada and the current system is working	The country RA is the operative reference for RMM for sourcing materials. The database provides examples for calibration and guidance only and does not replace country-specific RMMs.
Alternative for Indicator 15	Indicator 15 (lack of measures to control logging operations on steep slopes, leading to soil degradation) RMM: 1. Ensure that the organization’s specifications include provisions regarding logging on steep slopes. 2. Consult available reports that include quality checks following the skidding operation 3. If non-compliance with logging guidelines is identified, evidence demonstrating that corrective actions have been taken (staff awareness campaigns, on-site training, photos taken after restoration, etc.)	The proposal for alternative measures has been reviewed in relation to the identified risk and has been included to complement the existing example RMM. This proposal is well aligned with the existing mitigation actions and supports the intended outcome of the RMM for Indicator 15 in the database.

Q11: Do you have any additional comments or suggestions regarding the RMM Database or its usability? This may include comments on the structure of the database, clarity of mitigation measures, usability for different sourcing, organizations (primary or downstream producers), auditability for certification bodies, and suggestions for improvement.

Stakeholders broadly supported the concept of the RMM Database as a useful reference toolbox that can improve consistency, calibration, and sharing of good practices for risk mitigation. However, many respondents stressed that the database should remain a non-normative support tool and not evolve into a new set of mandatory requirements. Concerns were also raised regarding complexity, administrative burden, and mitigation measures that may be impractical across all sourcing contexts and supply chain actors.

A strong and recurring theme was the need for proportionality, national adaptation, and operational flexibility. Stakeholders emphasized that risk classifications and mitigation measures should not be applied mechanically across countries, as risk criticality governance conditions, and legal frameworks vary significantly between regions. Respondents requested recognition of existing national legislation and established practices, more flexibility for documentary verification and alternative mitigation approaches, and clearer guidance on the role and application of risk criticality levels. Additional recommendations included improving the usability and structure of the database, incorporating examples from a broader range of countries and source types, and strengthening communication on the intended purpose and governance of the database.

Key theme	Summary of Comments	FSC Response
Complexity, usability, and administrative burden	Stakeholders stated that the database is overly detailed and difficult to operationalize, particularly for smallholders and complex supply chains.	FSC acknowledges these concerns and added an “Application note” under each database example to improve usability and clarify differentiation based on actor position in supply chain. Application note is included to support interpretation of the illustrative examples in this database. They are not part of the RMM and do not create additional requirements, obligations, or drafting expectations. They are intended to explain example-specific considerations, such as verifier selection, application of conditional triggers, or supply chain-based differentiation. Users should treat them as illustrative guidance to support understanding and adaptation of RMM examples to their own context.
Need for stronger alignment with national and local context	Respondents emphasized that mitigation measures must reflect national legal systems, enforcement realities, and local forest management practices.	The RMM Database is a non-normative guidance resource. FSC further clarifies that examples are illustrative and should be adapted to the relevant national or sub-national context, governance conditions, supply-chain role, source type, available evidence and control systems. Further information is added in the User guidance.
Clarification of purpose and intended use of the database	Several stakeholders requested clearer communication that the database is a guidance resource rather than a mandatory checklist.	FSC has strengthened explanatory guidance regarding the intended use of the database as a non-normative guidance resource, in the User guidance
Technical structure and navigation	Respondents requested improved filtering, categorization, and more user-friendly navigation functions.	FSC has considered the comments and developed a visual interface to improve navigation. Users can filter by indicator, risk context and source type. The full excel dataset can be downloaded directly from the dashboard.

Overall conclusion

The consultation demonstrates broad support for developing a centralized database of RMM examples while identifying important areas requiring refinement before publication. Stakeholders consistently recognized the potential value of the database as a reference resource but requested clearer guidance on its intended use, stronger contextualization of examples, improved proportionality of mitigation measures, and greater consideration of national implementation contexts. The revisions described in this report have been incorporated to address these themes while maintaining the database's intended role as a non-normative reference tool.

Next Steps and Governance

FSC has implemented Version 1.0 of the RMM Database following integration of consultation feedback to the database examples. The database will be maintained as a living resource subject to a structured governance and review cycle.

Approved national Risk Assessments remain the authoritative source for risk conclusions and underpin all database content. Each database entry will retain traceability to its source Risk Assessment to ensure transparency and consistency with FSC-PRO-60-006b and FSC-STD-40-005.

The database will be periodically reviewed and updated following the approval of new or revised Risk Assessments, including the addition of RMM examples from approved Risk Assessments, as well as stakeholder-submitted proposals of RMM examples received via the database feedback form located in the dashboard. The dashboard will be updated in parallel to ensure consistency across user interface.

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