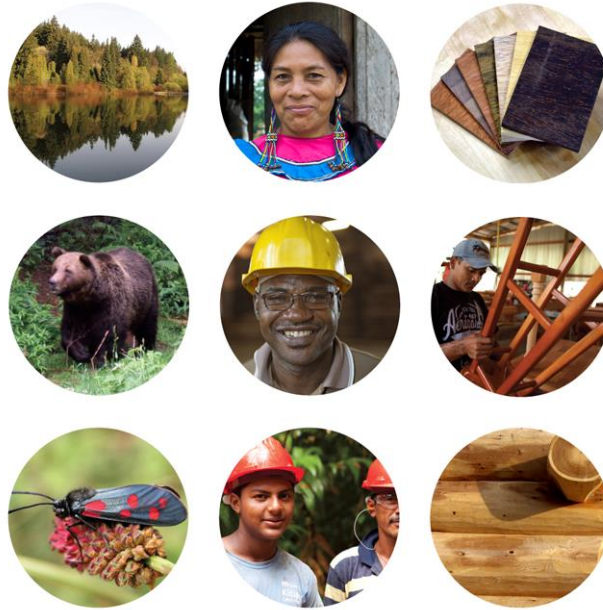




Forest Stewardship Council®



# Interpretations of the normative framework

CHAIN OF CUSTODY

05 JULY 2021



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## STANDARDS

### FSC-STD-20-011 (V2-0) CHAIN OF CUSTODY EVALUATIONS

|   |  |
|---|--|
| <b>Code</b>   | INT-STD-20-011_04 (withdrawn)                |
| <b>Requirement (s)</b>  | Clauses 2.7 and 8.4                          |
| <b>Publication date</b>   | 21 November 2013 (withdrawn on 15 June 2020) |
| <p><b>Can an on-site audit exceptionally be replaced by a desk audit if the organization is located in a country or region with an actual demonstrated security risk for the life or health of auditors?</b></p> <p>In the case of a demonstrated security risk for the life or health of auditors, the CB may apply for derogation from PSU to replace an on-site audit by a desk audit. The application shall include:</p> <ul style="list-style-type: none"> <li>a) Certificate code of the company;</li> <li>b) Activities under the scope of the certificate (products and processes);</li> <li>c) Evidences of security risks confirmed through verifiable public sources (e.g. an official travel warning);</li> <li>d) Other additional information, as required by FSC.</li> </ul> <p>Derogation applications will be evaluated on a case by case basis.</p> |  |

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| <b>Code</b>   | INT-STD-20-011_12 (also published under FSC-PRO-20-001 with code INT-PRO-20-001_01) |
| <b>Requirement (s)</b>  | Clause 2.7d   |
| <b>Publication date</b>   | 11 February 2016; amended 28 April 2016   |
| <p><b>How are CBs required to verify that a certificate holder (CH) demonstrates its commitment to comply with the values of FSC as defined in the “Policy for the Association of Organizations with FSC” (FSC-POL-01-004)?</b></p> <p>CBs have to verify (audit) the CH’s commitment to comply with the values of FSC as defined in the Policy for Association according to FSC-STD-40-004 V2-1 Clause 1.5.1. This needs to be done by evaluating the existence of a self-declaration signed by the CH (FSC-PRO-20-001 V1-1 Section 3).</p> <p>See also INT-PRO-20-001_02 for situations of evidenced infringements of the Policy for Association.</p> |   |

|   |   |
|---|---|
| <b>Code</b>   | INT-STD-20-011_14 (also published under FSC-PRO-20-001 with code INT-PRO-20-001_02) |
| <b>Requirement (s)</b>  | Sections 1 and 3  |
| <b>Publication date</b>   | 28 April 2016   |
| <p><b>Shall the CB raise corrective action requests (CARs) to a CoC certificate holder (CH) if there is objective evidence for infringements of the Policy for Association?</b></p> <p>If the CB witnesses evidence of infringements of the FSC Policy for Association in the audit (FSC-PRO-20-001 V1-1 Section 1) or detects such evidence through other means such as by reviewing (evaluating) complaints, disputes or allegations of nonconformity received from</p> |   |

stakeholders (FSC-STD-20-011-V2-0 Clause 2.7d), the CB shall record the evidence for infringements in the audit report and alert FSC International about a potential non-compliance with the FSC Policy for Association for further evaluation.

The CB shall not raise CARs about infringements of the FSC Policy for Association to the CH as relevant conclusions are the subject matter of FSC International and require a decision by the international FSC Board of Directors.

If, however, the evidenced infringements of the Policy for Association also indicate nonconformities with applicable FSC certification requirements, the CB shall raise CARs accordingly.

|                         |   |
|-------------------------|---|
| <b>Code</b>             | INT-STD-20-011_13                       |
| <b>Requirement (s)</b>  | Clause 2.7d                             |
| <b>Publication date</b> | 11 February 2016; amended 28 April 2016 |

**Does the requirement per FSC-STD-20-011 V2-0 Clause 2.7 d) to review “complaints, disputes or allegations of non-conformities received by the organization and/or the certification body” also apply to those related to infringements of the Policy for Association?**

- 1) Yes. Complaints, disputes or allegations of nonconformity received from stakeholders have to be reviewed by the certification body in all cases according to FSC-STD-20-011 V2-0 Clause 2.7.d. Further evaluation is only required if the review indicates that there is:
- a) evidence of nonconformities of the CH with any FSC certification requirements applicable to the scope of certification; or
  - b) a risk for nonconformities with applicable FSC certification requirements due to other activities of the organization (including non-certified entities or operations) that may affect the integrity of the chain of custody system, such as illegal timber trade, document forgery or product counterfeiting.

The CB shall record the complaint, dispute or allegation and any identified evidence for infringements of the Policy for Association in the audit or complaint investigation report and alert FSC International about a potential non-compliance with the FSC Policy for Association for further evaluation.

Complaints received by the CH have to be reviewed in all cases according to ISO 65 Clause 15 for conformity with FSC-STD-20-001 V3-0. If they relate to nonconformity with applicable certification requirements in certified entities or operations, appropriate action must be taken by the CH and documented. Otherwise similar considerations apply as provided under point 1) above.

|                         |                   |
|-------------------------|-------------------|
| <b>Code</b>             | INT-STD-20-011_02 |
| <b>Requirement (s)</b>  | Clause 2.7e       |
| <b>Publication date</b> | 23 April 2013     |

**Is it acceptable to audit loggers through desk audit when the logger does not have a log yard to visit?**

Yes. The desk audit is applicable to loggers holding a FSC Chain of Custody certificate and that do not have a log yard. The desk audit shall cover all applicable standard requirements of FSC-STD-40-004 V2-1, except the ones that only apply to COC certificates with physical

possession of products, namely Clauses 2.2, 3.4, 5.1, Part II (8 Percentage System, 9 Credit System) and Part IV. Evaluation against the standard requirements related to labeling of products are only required when the FSC label is used by the logger.

|                         |   |
|-------------------------|---|
| <b>Code</b>             | INT-STD-20-011_09 (also published under FSC-STD-20-007 with code INT-STD-20-007_25) |
| <b>Requirement (s)</b>  | Clause 4.3.2  |
| <b>Publication date</b> | 19 May 2014   |

**When a nonconformity is to be graded by the Certification Body, shall the attribute 'repeated' ('recurring') be applied at the level of a 5-year certification cycle or at the level of the full lifetime of a certificate?**

'Repeated' means that the same root cause that already resulted in a minor nonconformity in a previous audit has been re-detected as a reason for a nonconformity in a following audit within the same 5-year certification period/cycle. This is usually indicated by a nonconformity with the same indicator / requirement than in a previous audit.

|                         |   |
|-------------------------|---|
| <b>Code</b>             | INT-STD-20-011_05 (also published under FSC-STD-20-007 with code INT-STD-20-007_24) |
| <b>Requirement (s)</b>  | Clause 4.5  |
| <b>Publication date</b> | 20 February 2014  |

**According to a PSU interpretation, surveillance evaluations shall take place at least once per calendar year for FM audits and at least once per calendar year, but not later than 15 months after the last audit for CoC audits.**

**However, FSC-STD-20-007 and FSC-STD-20-011 require minor non-conformities in FM and CoC to be fully corrected within one year (under exceptional circumstances within two years in CoC).**

**If there are outstanding minor non-conformities to be evaluated, shall a surveillance evaluation take place within the next 12 months to have the CAR closed?**

If an onsite surveillance evaluation is required to confirm the correction of the outstanding minor non-conformity, the audit shall take place within the 12-month period.

If an outstanding minor non-conformity can be closed by evidence not requiring an onsite evaluation, the normal audit timelines can be followed.

|                         |                     |
|-------------------------|---------------------|
| <b>Code</b>             | INT-STD-20-011_01   |
| <b>Requirement (s)</b>  | Clauses 4.5 and 4.6 |
| <b>Publication date</b> | 15 April 2011       |

**When does the given timeline commence for correction of non-conformities?**

The given timeline commences from the moment when the corrective action request is either formally accepted by or formally presented to the certificate holder (whichever happens first).

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| <b>Code</b>  | INT-STD-20-011_08 (also published in FSC-PRO-20-003 with code INT-PRO-20-003_02) |
| <b>Requirement (s)</b>   | Clause 4.6   |
| <b>Publication date</b>  | 19 May 2014  |
| <p><b>How does the status of open minor nonconformities not evaluated within the 12 months' timeframe affect the ability to transfer certificates to a new certification body?</b></p> <p>Minor nonconformities not evaluated by the preceding certification body within the required 12-months timeframe do not automatically upgrade to majors. The certificate may still be transferred to the succeeding certification body but the pending minor nonconformities shall be evaluated in the transfer audit and then be upgraded if not closed.</p> |  |

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|--|-------------------|
| <b>Code</b>  | INT-STD-20-011_10 |
| <b>Requirement (s)</b>   | Clause 5.11       |
| <b>Publication date</b>  | 13 January 2015   |
| <p><b>For a company to source Controlled Wood in areas that have been designated as 'unspecified risk' in a National Risk Assessment or risk assessment by a company, it must include the relevant Forest Management Units (FMUs) in its company verification program according to Annex 3 of FSC-STD-40-005 V2-1. FSC-accredited Certification Bodies are then required to conduct field verification to audit the performance of the company verification program.</b></p> <p><b>If an area is designated as 'unspecified risk' for risk assessment indicator 1.4 (relating to the perception of corruption), how would field verification by the FSC-accredited Certification Body check whether an FMU or supplier has been controlled for this indicator, and, would field verification be required when an area is designated as unspecified risk only for this indicator?</b></p> <p>Unspecified risk designations are relevant for the whole Controlled Wood category and not only for particular indicators. Requirements for the verification of unspecified risk areas as outlined in Annex 3 of FSC-STD-40-005 and in ADVICE-40-005-19 are relevant for Controlled Wood categories and do not contain indicators relevant for risk assessment. Therefore, the Certification Body's evaluation of verification programs in unspecified risk areas shall not focus on assessing conformance against risk assessment indicators and shall follow the relevant normative requirements.</p> |                   |

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|---|-------------------|
| <b>Code</b>   | INT-STD-20-011_07 |
| <b>Requirement (s)</b>  | Clause 5.11       |
| <b>Publication date</b>   | 13 May 2014       |
| <p><b>Is a certification body required to conduct consultation with stakeholders while evaluating company compliance to Annex 3 of FSC-STD-40-005 FSC standard for company evaluation of controlled wood?</b></p> |                   |

No, a certification body is not required to conduct consultation with stakeholders while evaluating company compliance to Annex 3 of FSC-STD-40-005. The company is required to conduct stakeholder consultation for relevant Categories of controlled wood and the certification body shall verify the company's compliance with standard requirements.

|                         |                                 |
|-------------------------|---------------------------------|
| <b>Code</b>             | INT-STD-20-011_06               |
| <b>Requirement (s)</b>  | FSC-STD-20-011 V2-0 Clause 5.12 |
| <b>Publication date</b> | 11 April 2014                   |

**FSC-STD-40-005, Annex 3 sets the minimum sampling rate for certificate holders to apply when selecting FMUs for their Annex 3 controlled wood supplier verification program. FSC-STD-20-011 defines the equation that CBs are required to use when selecting from FMUs included in the supplier verification program.**

**In cases where the certificate holder voluntarily decides to include a higher number of FMUs for field visits than is required by FSC-STD-40-005; is it acceptable for the CB to calculate their sample size on the minimum number required rather than the actual number of FMUs visited by the certificate holder?**

**For example, certificate holder is required to include 35 FMUs, but they select to increase their sample size to 60. Is the CB required to sample 5 FMUs ( $0.8 * \sqrt{35}$ ) or 7 FMUs ( $0.8 * \sqrt{60}$ )?**

FSC does not want to discourage certificate holders from electing to sample CW suppliers at higher rates.

It is acceptable for the CB to base their sample size on the minimum number required to be included in the supplier field visits as per FSC-STD-40-005, Annex 3, 1.8., provided the CB has analyzed the reason(s) for extending the sampling rate by the certificate holder and the CB has come to the conclusion that the minimum sampling rate is sufficient to verify unspecified risk in the given conditions.

In the example above, the CB would calculate their minimum sample size to be 5 FMUs.

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|-------------------------|-------------------|
| <b>Code</b>             | INT-STD-20-011_11 |
| <b>Requirement (s)</b>  | Clause 7.1        |
| <b>Publication date</b> | 05 October 2015   |

**FSC-STD-40-007 V2-0 Clause 4.1 sets out the sampling rate for organizations to apply when performing on-site audits of their suppliers included in their Supplier Audit Program. FSC-STD-20-011 V2-0 Clause 7.1 then defines the calculation for CBs to apply when selecting from those audited suppliers.**

**In cases where the organization voluntarily decides to conduct a higher number of on-site audits of their suppliers than required, is it acceptable for the CB to calculate their sample size on the minimum number required rather than the actual number of suppliers visited by the organization?**



FSC does not want to discourage organizations from electing to sample suppliers at higher rates.

It is acceptable for the CB to base their sample size on the minimum number required to be included in the supplier site audits as per FSC-STD-40-007 V2-0 Clause 4.1, provided that the CB has analyzed the reason(s) given by the organization for extending the sampling rate within their Supplier Audit Program and the CB has come to the conclusion that the minimum sampling rate is sufficient.

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| <b>Code</b>             | INT-STD-20-011_03 |
| <b>Requirement (s)</b>  | Clause 8.2.f      |
| <b>Publication date</b> | 29 May 2013       |

**FSC considers outsourcing across national borders to countries with Corruption Perception Index (CPI) lower than 50 as high risk activity. If a company based in China establishes an outsourcing agreement with another company situated in Hong Kong, is this situation considered as cross-border outsourcing?**

Recognizing that Hong Kong is a Special Administrative Region of the People's Republic of China, FSC does not consider the outsourcing activity of a company based in Hong Kong to a company based in mainland China to be cross-board outsourcing in the context of FSC-STD-20-011 V2-0 Clause 8.2.f.

## **FSC-STD-20-011 (V3-0) CHAIN OF CUSTODY EVALUATIONS**

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| <b>Code</b>   | INT-STD-20-011_15  |
| <b>Requirement (s)</b>  | Definition „Scope of Chain of Custody certificates“; Definition „FSC certified product“ of FSC-STD-40-004 V2-1 |
| <b>Publication date</b>   | 11 November 2016   |
| <p><b>An FM/CoC organization has sold standing trees to a CoC organization <u>before</u> the certification of the FM/CoC organization is suspended or expired. Is the CoC certificate holder allowed to harvest the trees and consider the logs as FSC-certified?</b></p> <p>No, once the FM/CoC certification is suspended or expired the forest stand loses the FSC status, even if it has been sold already. The harvesting of standing timber is only allowed if covered by a valid FM certification. Thus the CoC certified organization, which has purchased the standing trees can not anymore claim the logs to be FSC certified.</p> |  |

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|--|-------------------|
| <b>Code</b>  | INT-STD-20-011_17 |
| <b>Requirement (s)</b>   | Section 6, Note   |
| <b>Publication date</b>  | 27 September 2016 |
| <p><b>1) Does a CB have to perform a stakeholder consultation for an organization sourcing material from an area classified as low risk through an FSC-NRA or FSC-CNRA?</b></p> <p><b>2) Does a CB have to perform a stakeholder consultation for all surveillance audits?</b></p> <p>1) No, a stakeholder consultation conducted by the CB is not mandatory.</p> <p>2) No, a stakeholder consultation conducted by the CB is mandatory only for initial FSC-STD-40-005 V3-0 audits and re-audits.</p> |                   |

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| <b>Code</b>   | INT-STD-20-011_16 (withdrawn and replaced under FSC-STD-20-011 V4-1 with code INT-STD-20-011_32) |
| <b>Requirement (s)</b>  | Table B, Clause 2 e) and Footnote 6  |
| <b>Publication date</b>   | 11 November 2016 (withdrawn on 02 December 2020)   |
| <p><b>Shall Certification Bodies list all sub-sites of Single CoC certificates in the FSC database of certificates?</b></p> <p>No. In the case of Single CoC certificates, only the main site that holds the FSC chain of custody certificate shall be listed in the FSC database of certificates. Only participating sites of Multi-site and Group CoC certificates shall be listed in the FSC database.</p> |  |

## **FSC-STD-20-011 (V4-0) CHAIN OF CUSTODY EVALUATIONS**

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|--|-------------------|
| <b>Code</b>  | INT-STD-20-011_18 |
| <b>Requirement (s)</b>   | Section 6, Note   |
| <b>Publication date</b>  | 27 September 2016 |
| <p><b>1) Does a CB have to perform a stakeholder consultation for an organization sourcing material from an area classified as low risk through an FSC-NRA or FSC-CNRA?</b></p> <p><b>2) Does a CB have to perform a stakeholder consultation for all surveillance audits?</b></p> <p>1) No, a stakeholder consultation conducted by the CB is not mandatory.</p> <p>2) No, a stakeholder consultation conducted by the CB is mandatory only for initial FSC-STD-40-005 V3-0 audits and re-audits.</p> |                   |

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|--|------------------------|
| <b>Code</b>  | INT-STD-20-011_19      |
| <b>Requirement (s)</b>   | Clauses 2.6 e) and 3.2 |
| <b>Publication date</b>  | 15 March 2017          |
| <p><b>Can certification bodies conduct desk-audits to approve the transition of certificate holders from V2-1 to V3-0 of FSC-STD-40-004?</b></p> <p>Yes, except when there are elements of the standard that need to be verified on-site for the confirmation of certificate holder's conformity with the requirements. Desk audits for standards transition do not replace the need for annual surveillance audits, except when the requirements of Clause 2.6 e) and 3.2 of FSC-STD-20-011 V4-0 are met.</p> |                        |

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| <b>Code</b>  | INT-STD-20-011_23 |
| <b>Requirement (s)</b>   | Clause 4.3.16     |
| <b>Publication date</b>  | 01 August 2018    |
| <p><b>Clause 4.3.16 specifies the maximum timelines for the correction of minor and major nonconformities. Can certification bodies define timelines that are shorter than the ones specified in this Clause?</b></p> <p>Yes, certification bodies can establish timelines for the correction of nonconformities that are shorter than the maximum timelines specified in Clause 4.3.16. This is particularly necessary when there are identified risks to system integrity (e.g. companies shall immediately stop selling non-conforming products) or when shorter timelines that are necessary to support supply chain integrity investigations.</p> |                   |

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| <b>Code</b>  | INT-STD-20-011_20                          |
| <b>Requirement (s)</b>   | FSC-STD-20-011 V4-0 Clause 4.8, Clause 6.2 |
| <b>Publication date</b>  | 16 January 2018                            |
| <p><b>1. An organization is currently certified to FSC-STD-40-005 V2-1 and is planning to make the transition to V3-1. However, it is not currently sourcing controlled material and will not have purchases planned by the audit date. In such cases, can the transition audit to FSC-STD-40-005 V3-1 be conducted on the DDS they have in place prior to actual sourcing?</b></p> <p><b>2. If the transition audit can be conducted on the DDS prior to sourcing, is a follow up audit required after sourcing commences, to verify full implementation of the DDS? Further, is an additional audit required in situations where risk designation for the supply area changes from ‘low’ to ‘specified/unspecified’ risk?</b></p> <p><b>3. Is an additional audit required in situations where there is a change of the scope of the DDS by an organization between audits to source controlled material from new supply area?</b></p> <p>1. The transition audit to FSC-STD-40-005 V3-1 can be conducted on the DDS that the organization has in place prior to actual sourcing.</p> <p>2. The occurrence of an additional audit after sourcing commences depends on the risk identified in the DDS:</p> <ul style="list-style-type: none"> <li>a. If ‘low risk’ is identified in the risk assessment for the origin, and there is no risk of mixing within the DDS, no additional audit is required after sourcing commences.</li> <li>b. If ‘low’ risk cannot be determined in the risk assessment for the origin, and/or there is risk of mixing , an additional audit is required.</li> <li>c. In cases where there is a change in the risk designation of the supply area in a company risk assessment or an extended company risk assessment, the certification body is required to evaluate the DDS for relevance, adequacy and effectiveness and whether the organization has reviewed the risk assessment and made changes accordingly.</li> </ul> <p>NOTE 1: The process of review of the DDS could involve an additional field audit, or the requirement may be satisfied with a desk audit. It is upto the certification body to decide, depending on the scope and scale of the organization’s operations and the extent of change in the DDS.</p> <p>NOTE 2: In regular cases (when the transition audit is performed on the implemented DDS and/or there is no sourcing from new supply areas in between the transition evaluation audits and subsequent surveillance audits), no additional audit is required when risk is identified as a result of newly approved FSC risk assessment.</p> <p>3. Where there is a change of the scope of the DDS by an organization (between the transition audits and subsequent audits) to source controlled material from new supply areas, the occurrence of an additional audit depends on the risk designation of the new supply area:</p> <ul style="list-style-type: none"> <li>a. If ‘low risk’ is identified in the risk assessment for the origin, and there is no risk of mixing relevant for the new supply area, no additional audit is required after sourcing from the new supply area commences.</li> <li>b. If risk other than ‘low’ is identified in the risk assessment for the origin, and/or there is risk of mixing, relevant for the new supply area, an additional audit is required.</li> </ul> |  |

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| <b>Code</b>   | INT-STD-20-011_21                                    |
| <b>Requirement (s)</b>  | FSC-STD-20-011 V4-0 Table B, FSC-STD-40-005 V3-1 2.1 |
| <b>Publication date</b>   | 16 January 2018                                      |
| <b>Does the organization need to review potential suppliers not currently included in their DDS as part of the summary of the findings for field verification?</b>  |  |
| <p>If the organization chose to exclude sites at the risk assessment stage, there is no requirement under FSC-STD-40-005 V3-1 to include this information in the summary of the DDS. Potential suppliers are not yet a part of the DDS. However, if field verification undertaken as a control measure resulted in one or more supply units, suppliers or sub-suppliers being excluded from the organization's DDS, this should be stated in the summary of the organization's findings required by FSC-STD-40-005 V3-1 sub-clause 6.2(d), as this is effectively a control measure taken to address identified risk.</p> |  |

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|---|---|
| <b>Code</b>   | INT-STD-20-011_22   |
| <b>Requirement (s)</b>  | FSC-STD-20-011 V4-0 clause 6.2, FSC-STD-40-005 V3-1 Annex E |
| <b>Publication date</b>   | 16 January 2018   |
| <b>If the organization develops a control measure based on a desk evaluation, can the certification body apply evaluation of control measures at the forest level if the examples in Annex E Table B suggest that a field based control measure should have been developed?</b>   |   |
| <p>FSC-STD-40-005 V3-1 Section 4 (Risk mitigation) does not specify the type of control measures that shall be established by the organization. FSC-STD-40-005 V3-1 Annex E is informative, and contains guidance and examples, not normative requirements. However, when field based control measures have been designed by the certification body in the system for evaluating the relevance, effectiveness, and adequacy of the DDS, according to Clause 6.2, then the certification body can apply evaluation of the control measures at the field level.</p> |   |

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| <b>Code</b>  | INT-STD-20-011_26 |
| <b>Requirement (s)</b>   | Clause 7.5 a)     |
| <b>Publication date</b>  | 02 April 2019     |
| <b>The Central Office of a group CoC certificate included new sites to the certificate scope within the approved annual growth rate in the period between two certification body's evaluations. Considering that all new sites have the same risk, how should they be sampled by the certification body at the next surveillance evaluation?</b> |                   |
| <p>The sites that have been incorporated into the certificate scope in the period between the certification body's evaluations shall be sampled together with the sites that were already in the scope at the previous evaluation.</p>   |                   |

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|-------------------------|--|
| <b>Code</b>             | INT-STD-20-011_27                                  |
| <b>Requirement (s)</b>  | Table A (Matrix for determination of R risk index) |
| <b>Publication date</b> | 02 April 2019                                      |

**When should certification bodies select the option “audit for inclusion of new participating sites in the certificate” for calculating the Risk Index according to Table A of FSC-STD-20-011?**

This option shall be selected when the certification body conducts audits between main-evaluations, surveillance evaluations and re-evaluations with the purpose of approving the inclusion of new sites in the scope of group CoC certificates.

|                         |                            |
|-------------------------|----------------------------|
| <b>Code</b>             | INT-STD-20-011_24          |
| <b>Requirement (s)</b>  | Clause 11.1; Table B, 4.c) |
| <b>Publication date</b> | 21 September 2018          |

**What is the definition of „evaluation findings“ as included in evaluation reports?**

Evaluation findings are defined as results of the evaluation of the collected audit evidence against audit criteria, and can thus indicate conformity or nonconformity. Audit evidence consists of records, statements of fact or other information relevant to the audit criteria and is verifiable. Audit reports for chain-of-custody shall include systematic presentation of findings rather than simply evidence. Findings demonstrating conformity shall include a description of how conformity is achieved or maintained.

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|-------------------------|----------------------------|
| <b>Code</b>             | INT-STD-20-011_25          |
| <b>Requirement (s)</b>  | Clause 11.1; Table B, 4.c) |
| <b>Publication date</b> | 21 September 2018          |

**Is it acceptable that CBs summarise the systematic presentation of findings demonstrating conformity or nonconformity of certificate holders in CoC audits?**

Yes, summaries are acceptable, as long as the critical control points are addressed, and conformity with the standard sections indicated in bold is summarized in a way that allows the decision-making entity to make an informed decision on the overall conformity or non-conformity of the implemented system.

## **FSC-STD-20-011 (V4-1) CHAIN OF CUSTODY EVALUATIONS**

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| <b>Code</b>  | INT-STD-20-011_28                                     |
| <b>Requirement (s)</b>   | Clause 2.6 a) and FSC-STD-20-001 V4-0 Clause 1.2.3 q) |
| <b>Publication date</b>  | 06 May 2019; amended 05 May 2021                      |
| <p><b>1. Do CBs need to verify accounting records of non-FSC sales for the purpose of confirming information provided in sales documents and annual volume summaries?</b></p> <p><b>2. What is the normative basis for CBs to assess these records?</b></p> <p>1. CBs shall verify accounting records of non-FSC sales in the following situations during an annual evaluation:</p> <ul style="list-style-type: none"> <li>a. The CB received a complaint that leads to the suspicion of false claims, fraud or incorrectly declared FSC volumes.</li> <li>b. The CB auditor comes across evidence that leads to the suspicion of false claims, fraud or incorrectly declared FSC volumes (including at critical control points).</li> <li>c. The organization was part of a Transaction Verification data request since the last evaluation.</li> <li>d. The organization declared no sales and purchases of FSC material since the last evaluation.</li> <li>e. The organization waived the last evaluation.</li> </ul> <p>NOTE: The above-mentioned situations are not exclusive and CoC auditors can review non-FSC sales in other situations also as deemed necessary.</p> <p>2. The normative basis for requiring access to records of non-FSC sales is FSC-STD-20-001 V4-0 Clause 1.2.3 q).</p> |   |

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| <b>Code</b>   | INT-STD-20-011_30 (also published under FSC-STD-40-004 with code INT-STD-40-004_50) |
| <b>Requirement (s)</b>  | FSC-STD-40-004 V4-0 Clause 4.4<br>FSC-STD-20-011 V4-1 Table B Clause 4 h)           |
| <b>Publication date</b>   | 02 December 2020  |
| <p><b>Can an organization that makes custom manufactured products (e.g. woodworkers, building contractors, construction companies) choose to not present volumes (e.g. in m<sup>3</sup>) in their overview of job orders or construction projects?</b></p> <p>Yes, organizations that make custom manufactured products may present the annual volume summary as an overview of the job orders or construction projects instead of by product group covering the previous reporting period and other requirements as specified in Clause 4.4.</p> <p>When the organization is reporting only an overview of job orders or construction projects and not the annual volume summary, the certification body may meet the reporting requirements</p> |   |

of FSC-STD-20-011 PART III Table B Clause 4 h) by including the total number of jobs orders presented in the overview of custom projects.

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| <b>Code</b>  | INT-STD-20-011_31                  |
| <b>Requirement (s)</b>   | FSC-STD-20-011 V4-1 Clause 10.2 a) |
| <b>Publication date</b>  | 02 December 2020                   |
| <b>How shall certification bodies record information on organizations with no FSC sales since the last evaluation on the FSC database?</b>   |                                    |
| <p>In case an organization has not declared any FSC sales since the last evaluation, the certification body shall record this information in the FSC database in Salesforce in the following manner:</p> <ol style="list-style-type: none"> <li>1. In the Transaction Verifications Finding Detail section, under the item 'Finding', the certification body shall select the 'No Sales reported (10.2 a)' from the drop-down menu.</li> <li>2. In the field 'finding date', the certification body shall enter the date of the formal presentation of the audit finding.</li> </ol> |                                    |

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| <b>Code</b>   | INT-STD-20-011_29   |
| <b>Requirement (s)</b>  | FSC-STD-20-011 V4-1 Table B, 7 b)<br>FSC-STD-20-011 V4-1 Clause 12.4 a) |
| <b>Publication date</b>   | 02 December 2020  |
| <ol style="list-style-type: none"> <li>1. <b>Does the CB certification summary need to include the full summary of the organization's DDS?</b></li> <li>2. <b>Does the organization's DDS summary need to be translated into English and Spanish in the certification summary?</b></li> </ol> <p>1. No, the certification summary does not need to include the full summary of the organization's DDS. The certification summary shall include information made publicly available by the organization, or references to such (according to Section 6 of FSC-STD-40-005). This information shall be available for the period of validity of the certificate.</p> <p>NOTE 1: References to other locations (i.e. annexes or URLs) may replace the publicly available information in the certification summary.<br/>NOTE 2: The inclusion of confidential information is not required.</p> <ol style="list-style-type: none"> <li>2. When an organization's certificate covers a total supply area of more than 50,000 ha, the certification summary shall be translated to English or Spanish. Annexes or online sources that are referenced in the certification summary may also be translated to English or Spanish.</li> </ol> |   |



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| <b>Code</b>   | INT-STD-20-011_32   |
| <b>Requirement (s)</b>  | FSC-STD-20-011 V4-1 Table B, Clause 2 e)<br>Footnote 6 FSC-STD-20-011 |
| <b>Publication date</b>   | 11 November 2016 amended on 02 December 2020                          |
| <p><b>Shall Certification Bodies list all sub-sites of Single CoC certificates in the FSC database of certificates? Is it possible to list sub-sites of Single COC certificates into the FSC database?</b></p> <p>No. In the case of Single CoC certificates, only the main site that holds the FSC chain of custody certificate shall be listed in the FSC database (info.fsc.org). Only participating sites of Multi-site and Group CoC certificates shall be listed in the FSC database.</p> <p>However, certification bodies may list the sub-sites of single CoC certificates in a PDF document uploaded on the FSC database in cases where the physical address (sub-site) differs from the legal address (registration address) of the organization.</p> |   |

## **FSC-STD-40-003 (V2-1) CHAIN OF CUSTODY CERTIFICATION OF MULTIPLE SITES**


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| <b>Code</b>  | INT-STD-40-003_01 |
| <b>Requirement (s)</b>   | Clause 3.1        |
| <b>Publication date</b>  | 23 November 2011  |
| <p><b>How should a CB deal with the following scenario? A Participating Site of a Group CoC certification surpassed the defined threshold and the transitional membership phase of 2 years is coming to an end. In the meantime, the FSC National Office applied for nationally adapted eligibility.</b></p> <p>In this scenario FSC would exceptionally allow an extension of the transitional membership phase until FSC has taken a formal decision on the proposal for nationally adapted eligibility criteria submitted by the FSC National Office.</p> |                   |

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| <b>Code</b>  | INT-STD-40-003_03 |
| <b>Requirement (s)</b>   | Clause 3.1        |
| <b>Publication date</b>  | 11 November 2016  |
| <p><b>Is it acceptable that the total annual turnover of non-profit organizations offering sheltered workshops for disabled people and of prison workshops is calculated based on the sales of forest-based products rather than based on revenues of all goods and services?</b></p> <p>Yes, this is allowed. The national and international total annual turnover thresholds were calculated considering commercial activities of enterprises, not considering such types of non-profit organizations and prison workshops for prison labor.</p> |                   |

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| <b>Code</b>   | INT-STD-40-003_04 |
| <b>Requirement (s)</b>  | Clause 5.2.2.c    |
| <b>Publication date</b>   | 09 April 2018     |
| <p><b>In the selection of Central Office internal auditors, the standard specifies that “Auditors shall not audit activities for which they are responsible to oversee or participate in...”. Does this mean that supervisors or general managers who have ultimate authority over activities such as receipt of material or processing shall not conduct internal audits of those activities, even where the person does not perform these activities?</b></p> <p>“Being responsible to oversee or participate in” applies to direct supervisors of staff that are responsible for supervising and controlling the work of staff.<br/>A general manager could conduct audits where he/she is not the direct supervisor, even though being ultimately responsible for the activities of the organization.</p> |                   |

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| <b>Code</b>   | INT-STD-40-003_02 |
| <b>Requirement (s)</b>  | Clause 5.2.4      |
| <b>Publication date</b>   | 13 February 2015  |
| <p><b>According to Clause 5.2.4, for certificates with more than 20 Participating Sites and where the Participating Sites are not linked through common ownership, the Central Office’s auditors shall be in possession of a formal ISO 9001, ISO 14001 or OHSAS 18001 lead auditor certificate achieved through a recognized accredited training course. Is there an alternative solution for the qualification of Central Office’s auditors?</b></p> <p>Yes, training provided by FSC-accredited certification bodies or training organizations recognized by FSC satisfies the requirements of Clause 5.2.4 alternatively, provided the following conditions are met:</p> <ul style="list-style-type: none"> <li>• The training includes an equivalent of a 3-days ISO 19011 training course (incl. exam) provided by a formally qualified QMS, EMS or OHSAS lead auditor.</li> <li>• If the training is provided by an FSC-accredited certification body through an in-house trainer: <ul style="list-style-type: none"> <li>- The training course agenda and course material needs to be approved by ASI in advance.</li> <li>- ASI must be given the right to witness the implementation of trainings at its sole discretion.</li> </ul> </li> </ul> <p>NOTE: The certification body should carefully consider and address potential conflicts of interest.</p> |                   |

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| <b>Code</b>   | INT-STD-40-003_05  |
| <b>Requirement (s)</b>  | FSC-STD-40-003 V2-1 Clause 5.3.5   |
| <b>Publication date</b>   | 20 March 2020, updated 18 December 2020  |
|   | Effective from the date of publication until 30 June 2021, or until withdrawn. This interpretation will be updated as necessary. |
| <p><b>Clause 5.3.5 offers the option that Central Offices may conduct internal audits of Participating Sites as desk audits (remote audits) under certain circumstances. Would the coronavirus (COVID-19) pandemic, that places travel restrictions on many areas of the world, also be considered a circumstance in which desk audits (remote audits) would be justifiable?</b></p> <p>Yes, the coronavirus (COVID-19) pandemic does justify applying the option of desk audits (remote audits) as per Clause 5.3.5 for all types of participating sites, provided that:</p> <ol style="list-style-type: none"> <li>a. the Participating Site is in an area with a health risk (demonstrated through verifiable public sources, e.g. official travel warnings or restrictions) due to coronavirus, or</li> </ol> |  |

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- b. Central Office auditors are prevented from conducting an on-site audit due to travel restrictions imposed by organizational (certificate holder/Central Office) health and safety policies or public authorities.
  2. In addition to the option of conducting the internal audit as desk audits (remote audits), the Central Office may also consider postponing the internal audit, but not beyond the end of 2020.
  3. For new applicant sites, the initial internal audit may be replaced by desk (remote) audits in cases:
    - a. the new applicant sites are already meeting the existing requirements of Clause 5.3.5, *or*
    - b. the Central Office and the applicant sites meet the requirements specified in FSC-DER-2020-005 then the initial internal audit may be replaced by desk (remote) audits.
  4. The Central Office shall retain documented evidence for each case where this interpretation has been applied.
  5. As soon as travel restrictions have been lifted, internal audits shall be conducted as per regular audit procedures.

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## **FSC-STD-40-004 (V2-1) FSC STANDARD FOR CHAIN OF CUSTODY CERTIFICATION**

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| <b>Code</b>   | INT-STD-40-004_20 |
| <b>Requirement (s)</b>  | Scope             |
| <b>Publication date</b>   | 13 February 2015  |
| <p><b>Is it allowed to classify wood-based resin adhesives and lignin sulfonate used for sizing in paper production as “neutral”?</b></p> <p>Yes, until FSC has developed an approach to verify this type of NTFP material it is acceptable to classify such material as “neutral”.</p> <p>NOTE: “Neutral” means that this material is exempt from Chain of Custody control requirements.</p> |                   |

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| <b>Code</b>  | INT-STD-40-004_30          |
| <b>Requirement (s)</b>   | A Scope; INT-STD-40-004_03 |
| <b>Publication date</b>  | 11 November 2016           |
| <p><b>Are logistics companies expected to be covered by an outsourcing agreement, if there is risk that FSC certified material is mixed with non-FSC material during transport or temporary storage?</b></p> <p>Yes, in such cases the logistics companies need to be covered by an outsourcing agreement in accordance with the requirements of section 12 of FSC-STD-40-004.</p> |                            |

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|---|----------------------|
| <b>Code</b>   | INT-STD-40-004_21    |
| <b>Requirement (s)</b>  | Definition FSC claim |
| <b>Publication date</b>   | 10 June 2015         |
| <p><b>Do FSC claims need to be spelled in sales documents as they are spelled in the COC standard FSC-STD-40-004?</b></p> <p>The standard is not prescriptive about how the FSC claims should be spelled in sales documents. Therefore, only the 'FSC' acronym needs to be written in capital letters in FSC claims. The certified content specification (e.g. 100%, Mix Credit, Recycled 85%) may be spelled in lower case and/ or upper case (e.g. both FSC Mix Credit and FSC MIX CREDIT).</p> |                      |

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| <b>Code</b>             | INT-STD-40-004_19 (also published under FSC-STD-40-006 with code INT-STD-40-006_04) |
| <b>Requirement (s)</b>  | Section E   |
| <b>Publication date</b> | 05 September 2014   |

**Do the terms FSC-pure and FSC-mixed still apply?**

No, the terminology for claims was updated in FSC-STD-40-004 V2-1. FSC-pure is now referred to as FSC 100%; FSC-mixed as FSC Mix.

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| <b>Code</b>             | INT-STD-40-004_02 |
| <b>Requirement (s)</b>  | N/A               |
| <b>Publication date</b> | 01 February 2011  |

**Can an industry use old coconut palm trees from plantations as recycled wood?**

Coconut fibre is not considered as wood since it is a palm-derived material, despite of its similar commercial and functional properties compared to material from trees. This conclusion is based on the botanical definition that wood is an organic material produced by Dicots species and palms pertain to Monocots group of plants. FSC considers this material as a non-timber forest product where it originates from forests and as non-forest based material where it originates otherwise. The certification of coconut fibre would be possible in case that the material is produced in a forest based system (native forest or plantations). Therefore, palms produced from other land use systems are not subject to FSC certification and their material can be included in FSC certified products as non-forest based material. Also, this material is not eligible to be certified as FSC Recycled, since FSC considers the use of this material as a primary use of the palm trunks and, to be post-consumer reclaimed, it should be necessarily reclaimed from consumers.

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| <b>Code</b>             | INT-STD-40-004_25 |
| <b>Requirement (s)</b>  | Clause 1.4.2      |
| <b>Publication date</b> | 24 July 2015      |

**Are organizations required to keep records of both supplier invoices and delivery documents (where available)?**

Organizations need to keep sales documents as key records (documents showing the transfer of ownership). Where available, these shall be the invoices. It is not required to keep multiple sales documents of the same transaction. Legal obligations for record keeping remain unaffected.

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| <b>Code</b>   | INT-STD-40-004_23 |
| <b>Requirement (s)</b>  | Clause 2.1.1      |
| <b>Publication date</b>   | 24 July 2015      |
| <p><b>Can a COC certificate holder establish a product group list that includes products that are not eligible to be sold with an FSC claim?</b></p> <p>No, Clause 2.1.1 of FSC-STD-40-004 V2-1 specifies that organizations shall establish product groups for the products that will be sold with FSC claims. Therefore, FSC product groups shall only include products that are eligible to be sold with FSC claims.</p> |                   |

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| <b>Code</b>  | INT-STD-40-004_05 |
| <b>Requirement (s)</b>   | Clause 2.1.2b     |
| <b>Publication date</b>  | 15 April 2011     |
| <p><b>Is it acceptable to switch between credit and percentage control systems in a product group? For example, an organization uses the percentage system, but when the end of the claim period comes, they have not obtained enough input volume to reach the labelling threshold of 70%. Then they switch to the credit system and sell a volume of FSC Mixed Credit material equal to the Mixed XX% calculation.</b></p> <p>No, the organization cannot have two systems of control for the same product group and switch from one to another ad libitum. In a situation where the organization cannot reach the minimum threshold for labelling, the products can still be claimed as FSC certified on invoices informing the applicable FSC percentage (e.g. FSC Mixed 45%), but the FSC label shall not be applied.</p> <p>However, an organization may decide to permanently switch from one control system to another by defining a new product group. In this case the following shall apply regarding remaining eligible material:</p> <ol style="list-style-type: none"> <li>1. from the percentage to the credit system: the organization may enter in its credit account an input equivalent to the volume of FSC Mixed x% output resulting from the last claim period or job order that was not sold under the percentage system.</li> <li>2. from credit to percentage system: the remaining credits from the credit account cannot be used as input for the percentage system.</li> </ol> |                   |

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| <b>Code</b>  | INT-STD-40-004_09 |
| <b>Requirement (s)</b>   | Clause 2.1.3      |
| <b>Publication date</b>  | 18 April 2011     |
| <p><b>Is it acceptable to define credit system product groups by FSC claim and product type only, with no regard to input characteristics?</b></p> <p><b>For example, a door manufacturer produces the following door types:</b></p> <ol style="list-style-type: none"> <li>a) Solid wood door – sawn material components, dowels as minor components</li> <li>b) Sandwich door Type 1 – sawn material components, veneer, skins, chip board</li> <li>c) Sandwich door Type 2 – sawn material components, veneer, fiber board, chip board, honey comb</li> </ol> |                   |

**Could they define one product group (FSC Mixed Credit doors) and use one credit account for all of these door types?**

No, product groups under the credit system shall share similar input and output characteristics, in terms of quality and conversion factor, as defined in FSC-STD-40-004 Clause 2.1.3 and “Terms and Definitions”. The term “quality” represents characteristics in terms of species, composition/ specifications or value of the materials. It means that products that contain inputs of different quality (e.g. sawn wood and fiber board) and/or with different conversion factors (e.g. solid wood and sandwich door) cannot be combined in the same product group. Credits from materials of a certain quality (e.g. chip board) cannot be transferred to materials of different quality (e.g. veneer). Thus, the credit system is not applicable for the production of products composed by materials of different “qualities”, unless the organization establishes separate credit accounts for each input material.

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| <b>Code</b>             | INT-STD-40-004_10 |
| <b>Requirement (s)</b>  | Clause 3.1.2      |
| <b>Publication date</b> | 15 August 2011    |

**Is PEFC certified material eligible to be used in FSC product groups as FSC certified or FSC Controlled Wood?**

No. Material certified by the Program for Endorsement of Forest Certification (PEFC) is not accepted as FSC certified input and does not automatically meet the requirements of the FSC Controlled Wood standards. Therefore, PEFC certified material classifies as non-FSC certified input and must comply with FSC Controlled Wood standards before its use in FSC product groups.

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| <b>Code</b>             | INT-STD-40-004_26 |
| <b>Requirement (s)</b>  | Clause 4.1        |
| <b>Publication date</b> | 05 October 2015   |

**Can a product that is invoiced simultaneously containing FSC claims and claims of another forestry certification scheme (such as PEFC or SFI) be considered as FSC certified input by the buyer?**

Yes. However, in the case the buyer is certified against FSC and another forestry certification scheme, the buyer shall provide its FSC Certification Body access to both production and certification controls (access to both FSC and e.g. PEFC or SFI credit accounts) for verification that the volumes received are not being double counted. This requirement also applies in cases where the FSC accredited Certification Body is not accredited for certification against the other forestry certification scheme.

Amended on 05.10.2015; First published on 06.08.2012



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| <b>Code</b>   | INT-STD-40-004_28 |
| <b>Requirement (s)</b>  | 4.1.1             |
| <b>Publication date</b>   | 01 July 2016      |
| <p><b>In some cases, the verification of supplier invoice and support documentation is not possible or feasible on receipt of material or prior to further use. In these cases, is there any alternative for companies to meet the requirement of Clause 4.1.1?</b></p> <p>Yes. The intended outcome of this requirement is that organizations ensure that only eligible inputs are used in FSC product groups and that any incorrect claims on suppliers' documentation are identified before the organization sells materials or products with FSC claims. Organizations that have a system in place that ensures that these objectives are met may be considered as in conformity with this requirement.</p> |                   |

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| <b>Code</b>   | INT-STD-40-004_18           |
| <b>Requirement (s)</b>  | Clauses 4.1.1; 6.1.1; 6.1.2 |
| <b>Publication date</b>   | 19 May 2014                 |
| <p><b>Where non-certified organizations that are not required to be certified are involved in issuing sales or delivery documents (e.g. transporting companies, sub-contractors, 'del credere' agents), is it acceptable that only the invoice or the delivery document is used to identify inputs and outputs sold with FSC claims?</b></p> <p>Yes, non-certified organizations shall not use the certification code of certified organizations in their own documents. In these exceptional cases it is sufficient that only the sales or delivery document issued by the certified organization contains all information as specified in Clause 6.1.1 and is used to identify inputs and outputs sold with FSC claims. The document issued by the non-certified organization shall contain sufficient information to link the sale and related delivery documentation to each other.</p> |                             |

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| <b>Code</b>  | INT-STD-40-004_14 (also published under FSC-STD-20-007 with code INT-STD-20-007_11) |
| <b>Requirement (s)</b>   | Clause 5.2  |
| <b>Publication date</b>  | 06 February 2012  |
| <p><b>We are aware that where a main assessment had been carried out for a CoC certificate, the client may, after the certificate had been issued, sell the certified timber products that were in stock at the time of the main assessment, as certified. My first question relates to the CoC aspect of this, i.e. does this also mean the client may sell all certified timber products purchased between the time of the main assessment and the date the certificate is issued, as certified, after the certificate had been issued?</b></p> <p><b>This brings me to the FM situation, i.e. would this same rule apply for FM certification? If the rule does apply, does this mean that any standing stock that is felled in the period between the main evaluation and the date the certificate is issued, may then be sold as certified after the certificate had been issued?</b></p> |   |

The answer to the first question is Yes, according to FSC-STD-40-004 V2-1, which states:

Organizations in the certification process may use towards their input calculations material held in their stock at the time of the main assessment as well as material received between the date of the main assessment and the issue date of the organization's FSC Chain of Custody certificate. However, the organization may not sell any material with FSC claims prior to holding an FSC Chain of Custody certificate.

The answer to the second question is also Yes, with the conditions specified in FSC-STD-20-007:

In the case of joint Forest Management and Chain of Custody certification, timber that had been felled prior to the issue of a certificate, but which has not yet been sold by the forest management enterprise may be sold as certified if it was felled in the same calendar year or harvesting period and if the main evaluation did not reveal any major nonconformity.

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| <b>Code</b>   | INT-STD-40-004_24 |
| <b>Requirement (s)</b>  | Clause 6.1.1      |
| <b>Publication date</b>   | 24 July 2015      |
| <b>Is an organization allowed to include the FSC Chain of Custody code of its supplier on the invoice, in addition to its own code?</b> |                   |
| Yes, but it must be clear which code belongs to the organization issuing the invoice and which is the suppliers' code.                  |                   |

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| <b>Code</b>   | INT-STD-40-004_17 |
| <b>Requirement (s)</b>  | Clause 6.1.1      |
| <b>Publication date</b>   | 19 May 2014       |
| <b>Are certified or non-certified subcontractors allowed to include the certificate code of the contracting certified organization in their own sales and delivery documentation?</b> |                   |
| No, organizations can only use their own certificate code in their sales and delivery documentation, not the certificate code of another certified organization.                      |                   |

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| <b>Code</b>   | INT-STD-40-004_16 |
| <b>Requirement (s)</b>  | Clause 6.1.1      |
| <b>Publication date</b>   | 23 April 2013     |
| <b>Is the FSC Mix 100% claim allowed?</b>   |                   |
| Yes, the FSC Mix 100% claim is allowed on sales and delivery documents only. Although the FSC Mix 100% claim is accepted it is recommended to use the FSC Mix Credit claim instead. For labelling of these products, the FSC Mix label shall be used. |                   |

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| <b>Code</b>  | INT-STD-40-004_12 |
| <b>Requirement (s)</b>   | 6.1.1f            |
| <b>Publication date</b>  | 05 September 2011 |
| <p><b>In some countries, self-billing Invoices (SBIs) prepared by the purchaser are a substitute document for an invoice by the seller. It is acceptable that the purchaser uses the certification code of the seller in SBIs?</b></p> <p>Yes. As SBIs represent a long established business practice in the forestry industry and fully accepted by the tax authorities, it is acceptable that purchaser uses the certification code of the seller, or includes both the seller's and the purchaser's certification code in SBIs.</p> |                   |

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| <b>Code</b>  | INT-STD-40-004_08 (also published under FSC-DIR-40-004 with code INT-DIR-40-004_01) |
| <b>Requirement (s)</b>   | Clause 6.1.1  |
| <b>Publication date</b>  | 18 April 2011   |
| <p><b>Is it acceptable that the FSC Claims are abbreviated (e.g. FSC Mix Cred) due to space constraints in invoices?</b></p> <p>Yes, with the condition that:</p> <p>a) The abbreviation of FSC Claims is clearly defined in the organization's documented procedures, and</p> <p>b) The complete FSC claim is provided to customers through supplementary evidence, as defined in ADVICE-40-004-05 of FSC-DIR-40-004.</p> |   |

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| <b>Code</b>   | INT-STD-40-004_07 |
| <b>Requirement (s)</b>  | Clause 6.1.1      |
| <b>Publication date</b>   | 18 April 2011     |
| <p><b>In which language shall the FSC claims on sales and delivery documents be written?</b></p> <p>The FSC Claims on sales and delivery documents shall be written in English in the case of international sales. However, it is acceptable that the FSC Claim is translated to the other languages in the case of sales at national level (e.g. when both supplier and customer are located in the same country) or when the official language in the country of the supplier and customer is the same.</p> |                   |

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| <b>Code</b>   | INT-STD-40-004_06 |
| <b>Requirement (s)</b>  | Clause 6.1.1      |
| <b>Publication date</b>   | 15 April 2011     |
| <p><b>Is it acceptable that a product sold with a FSC claim also contains claims of other forestry conformity assessment schemes in its sales and delivery documents?</b></p> |                   |

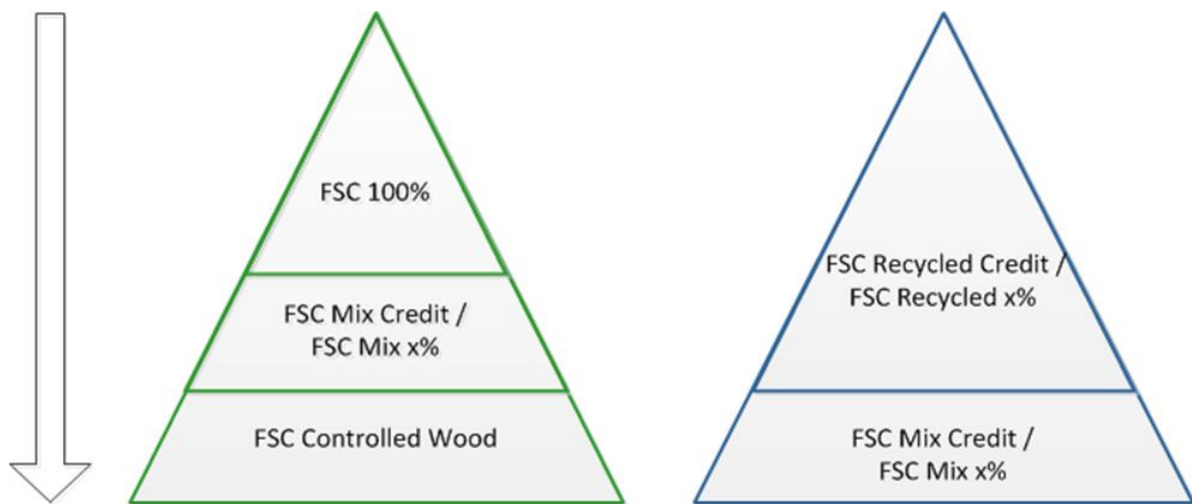
Yes. The FSC Chain of Custody and Trademark standards only present restrictions for the use of the FSC label on products together with the label of other forestry conformity assessment schemes. However, these restrictions do not apply for the identification of sales and delivery documents. In this case, the FSC claims and claims of other certification schemes shall not be merged. All elements of the FSC claim must be comprehensible and easily identifiable.

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| <b>Code</b>             | INT-STD-40-004_22 |
| <b>Requirement (s)</b>  | Clause 6.1.1g     |
| <b>Publication date</b> | 24 July 2015      |

**Is it possible to downgrade an FSC output claim?**

Yes, the following FSC output claims may be downgraded in any of the three systems for controlling FSC Claims (Transfer, Percentage and Credit System) as presented in the diagram below. In all cases, the FSC label shall correspond to the FSC claim made on sales documents.

NOTE: FSC Recycled products cannot be downgraded to FSC Controlled Wood since they do not meet FSC Controlled Wood requirements.



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| <b>Code</b>             | INT-STD-40-004_27 |
| <b>Requirement (s)</b>  | Clause 6.2.1      |
| <b>Publication date</b> | 14 December 2015  |

**Are certified retailers buying and selling finished and labelled FSC products allowed to downgrade output claims?**

Yes, retailers may do so. In such cases it is acceptable that the FSC claims on sales and delivery documentation do not correspond to the FSC claims on the labelled products.

NOTE: This approach aims to facilitate application of the standard to retailers selling finished and labelled products to end-consumers that often only receive standardized

receipts at the cash point. Clause 6.2.1 was not developed for organizations directly selling to end consumers.

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| <b>Code</b>  | INT-STD-40-004_11      |
| <b>Requirement (s)</b>   | Clause 6.2.1 and Scope |
| <b>Publication date</b>  | 05 September 2011      |
| <p><b>According to FSC-STD-40-004 V2-1, publishers and retailers are not required to be certified in order to resell FSC finished products, unless they perform at least one of the following activities:</b></p> <p><b>a) Pass on the FSC Claim to subsequent customers through sales and delivery documents;</b></p> <p><b>b) Apply the FSC label on-product;</b></p> <p><b>c) Process or transform FSC certified products (e.g. manufacturing, repackaging, relabeling, adding other forest-based components to the product).</b></p> <p><b>However, some companies that don't need certification are FSC certified in order to demonstrate their commitment to the FSC certification principles and values. In this context, are certified publishers and retailers required to comply with Clause 6.2.1 of FSC-STD-40-004 V2-1 if they sell finished certified products to customers that don't need or want to receive the invoices with FSC Claims on it?</b></p> <p>No, for certified publishers and retailers that sell finished certified products to customers that don't need or want to receive the invoices with FSC Claims on it, Clause 6.2.1 may be classified as not being applicable.</p> |                        |

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| <b>Code</b>   | INT-STD-40-004_29 |
| <b>Requirement (s)</b>  | Clause 6.3.1      |
| <b>Publication date</b>   | 01 July 2016      |
| <p><b>Clause 6.3.1 of FSC-STD-40-004 V2-1 requires organizations to ensure that the sale of FSC Controlled Wood is in conformity with Part 4 of FSC-STD-40-005 V2-1. Now that V3-0 of FSC-STD-40-005 is not applicable for those organizations who purchase FSC Controlled Wood and wish to resell it as such, are they still required to conform to Clause 6.3.1 and consequently Part 4 of FSC-STD-40-005 V2-1 until the next version of FSC-STD-40-004 (V3-0) is released?</b></p> <p>No, for these organizations Clause 6.3.1 is no longer applicable. The same requirements are still applicable to these CoC certificate holders, but they are covered by other requirements as specified in INT-STD-40-005_20.</p> |                   |

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| <b>Code</b>             | INT-STD-40-004_15                    |
| <b>Requirement (s)</b>  | Clause 7.3.1                         |
| <b>Publication date</b> | 23 April 2013; amended 10 March 2016 |

**Which output claim shall be used when inputs with different FSC claims are combined in the Transfer System?**

The below table presents the possible combinations of FSC input claims and resulting output claims when applying the Transfer System.

| <b>Inputs</b>                              | <b>FSC 100%</b>           | <b>FSC Mix Credit</b>     | <b>FSC Mix x%</b>         | <b>FSC Recycled Credit</b> | <b>FSC Recycled x%</b>    | <b>Pre-cons. reclaimed wood</b> | <b>Pre-cons. reclaimed paper</b> | <b>Post-cons. reclaimed wood and paper</b> | <b>FSC Controlled Wood</b> |
|--|---------------------------|---------------------------|---------------------------|----------------------------|---------------------------|---------------------------------|----------------------------------|--|----------------------------|
| <b>FSC 100%</b>                            | FSC 100%                  | FSC Mix Credit            | FSC Mix x%                | FSC Mix Credit             | FSC Mix x%                | No FSC claims are allowed       | FSC Mix 100%                     | FSC Mix 100%                               | FSC Controlled Wood        |
| <b>FSC Mix Credit</b>                      | FSC Mix Credit            | FSC Mix Credit            | FSC Mix x%                | FSC Mix Credit             | FSC Mix x%                | No FSC claims are allowed       | FSC Mix Credit                   | FSC Mix Credit                             | FSC Controlled Wood        |
| <b>FSC Mix x%</b>                          | FSC Mix x%                | FSC Mix x%                | FSC Mix x%                | FSC Mix x%                 | FSC Mix x%                | No FSC claims are allowed       | FSC Mix x%                       | FSC Mix x%                                 | FSC Controlled Wood        |
| <b>FSC Recycled Credit</b>                 | FSC Mix Credit            | FSC Mix Credit            | FSC Mix x%                | FSC Recycled Credit        | FSC Recycled x%           | No FSC claims are allowed       | FSC Recycled Credit              | FSC Recycled Credit                        | FSC Controlled Wood        |
| <b>FSC Recycled x%</b>                     | FSC Mix x%                | FSC Mix x%                | FSC Mix x%                | FSC Recycled x%            | FSC Recycled x%           | No FSC claims are allowed       | FSC Recycled x%                  | FSC Recycled x%                            | FSC Controlled Wood        |
| <b>Pre-cons. reclaimed wood</b>            | No FSC claims are allowed | No FSC claims are allowed | No FSC claims are allowed | No FSC claims are allowed  | No FSC claims are allowed | No FSC claims are allowed       | No FSC claims are allowed        | No FSC claims are allowed                  | No FSC claims are allowed  |
| <b>Pre-cons. reclaimed paper</b>           | FSC Mix 100%              | FSC Mix Credit            | FSC Mix x%                | FSC Recycled Credit        | FSC Recycled x%           | No FSC claims are allowed       | FSC Recycled 100%                | FSC Recycled 100%                          | FSC Controlled Wood        |
| <b>Post-cons. reclaimed wood and paper</b> | FSC Mix 100%              | FSC Mix Credit            | FSC Mix x%                | FSC Recycled Credit        | FSC Recycled x%           | No FSC claims are allowed       | FSC Recycled 100%                | FSC Recycled 100%                          | FSC Controlled Wood        |
| <b>FSC Controlled Wood</b>                 | FSC Controlled Wood       | FSC Controlled Wood       | FSC Controlled Wood       | FSC Controlled Wood        | FSC Controlled Wood       | No FSC claims are allowed       | FSC Controlled Wood              | FSC Controlled Wood                        | FSC Controlled Wood        |

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| <b>Code</b>  | INT-STD-40-004_13 |
| <b>Requirement (s)</b>   | Clause 9          |
| <b>Publication date</b>  | 01 December 2011  |
| <p><b>Are traders authorized to apply the credit system for trading of unfinished products?</b></p> <p>Traders can apply the credit system on the level of a trading office site under the following conditions:</p> <ol style="list-style-type: none"> <li>1) For the trade of primary products (e.g. logs, chips), and</li> <li>2) Exclusive for domestic trading (at national level), and</li> <li>3) There shall be a recognized third party measuring and control system of the forest products in place in order to ensure compliance with FSC product group definition (especially Clause 2.1.3), and</li> <li>4) The trade of FSC certified products is always linked to a physical delivery of products. Virtual transfers of certified products are prohibited.</li> </ol> |                   |

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| <b>Code</b>   | INT-STD-40-004_04 |
| <b>Requirement (s)</b>  | Section 12        |
| <b>Publication date</b>   | 15 April 2011     |
| <p><b>Are FSC outsourcing requirements applicable in the following situation: A subcontractor runs a scaling operation (scale house), which is located on-site at the FSC certified company's property?</b></p> <p>No, outsourcing requirements are only applicable when the subcontractor takes physical possession of FSC certified material, off-site from a FSC certified organization. If a subcontracted activity occurs on-site at a FSC certified organization, then the activity shall be included in the certificate scope and evaluated as part of the organization's CoC audit.</p> |                   |

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| <b>Code</b>  | INT-STD-40-004_03 |
| <b>Requirement (s)</b>   | Clause 12.1.1     |
| <b>Publication date</b>  | 01 February 2011  |
| <p><b>A FSC pulp producer ships its finished bales of pulp to a warehouse where it sits awaiting loading into ships or rail cars. The company does not relinquish ownership and the product is not altered in any way from the time it leaves the company facility to the warehouse and then into the ship or train. Is the process of warehousing considered outsourcing?</b></p> <p>Storage sites should be exempt from CoC evaluations where they constitute 'stopping places' or intersections only as part of transport agreements between two Chain of Custody operations. In other words, where certain storage facilities are used (or rented) by transport service providers to fulfill a contractual agreement between two CoC certified operations, such sites should not be considered part of an outsourcing agreement. Where, however, a CoC operation contracts a transport service provider or the warehouse owner to store goods in the absence of an agreed delivery to a customer (and would then only place a delivery order at a later point in time, once a sales contract has been signed), such a scenario should be considered an extension of the storage site of the CoC operation and justify to look at it as an outsourcing arrangement.</p> |                   |

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| <b>Code</b>             | INT-STD-40-004_01 |
| <b>Requirement (s)</b>  | Clause 12.1.1a    |
| <b>Publication date</b> | 01 February 2011  |

**A printer outsources part of its production to a non-FSC certified contractor. Can the contractor buy FSC paper and add it to an outsourced production?**

No, non-certified outsourcing contractors cannot buy and add forest-based material on their own, as per definition the contracting organization would not have ownership of all input materials. This would be different for certified contractors where they both act as contractors as well as suppliers with a purchase function on their own.



## **FSC-STD-40-004 (V3-0) CHAIN OF CUSTODY CERTIFICATION**

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| <b>Code</b>   | INT-STD-40-004_49   |
| <b>Requirement (s)</b>  | Section B: Scope, Clauses 2.1, 2.3, 4.2., 4.4, 5.1, 5.3 and 5.7 |
| <b>Publication date</b>   | 30 June 2020  |
| <b>When government agencies (or government bodies) run a public wood auction system, can timber that is owned and sold by the government, and originating from a government licensed concession which is FSC certified, be considered FSC certified although the agency itself does not hold an FM/COC or COC certificate?</b>  |   |
| Yes, this timber can be sold as FSC certified if it can be demonstrated that the certificate holder :   |   |
| <ul style="list-style-type: none"><li>a. source timber originating from an FM/COC certified Management Unit (MU) and the timber was harvested in full conformance with applicable FSC requirements;</li><li>b. implement a system that allows the timber to be traced back to the MU in which it was harvested, together with information on volume and cutting/harvest date.</li><li>c. establish a system between the agency and the certificate holder to regulate and control the use of the certificate holder's certification code and FSC Claims;</li><li>d. maintain control over the timber until the sale is made (i.e. the material is shipped directly to the auction winner from the certificate holder);</li><li>e. ensure that non-certified organizations (like the government agency) is not using the certification code of certified organizations in their own documents. In these exceptional cases, it is sufficient that only the sales or delivery document issued by the certified organization contains all information as specified in FSC-STD-40-004 Clause 5.1 and is used to identify inputs and outputs sold with FSC claims. The document issued by the non-certified organization shall contain sufficient information to link the sale and related delivery documentation to each other.</li><li>f. grant access to the certification body of an FM/COC certificate holder to all relevant documentation, records and sites of the agency and the successful bidder to verify the correct implementation of all applicable requirements, including those listed in this interpretation.</li></ul> |   |
| NOTE 1: COC certification is not required for organizations providing services to certified organizations without taking legal ownership of the certified products, including: <ul style="list-style-type: none"><li>a. agents and auction houses arranging the trade of certified products between buyer and seller;</li><li>b. providers of logistics services, transporting and/or temporarily storing or warehousing certified products without changing their composition or physical integrity;</li><li>c. contractors operating under an outsourcing agreement in accordance with Section 12 of the FSC-STD-40-004 V3-0 standard.</li></ul>  |   |
| NOTE 2: any other situation with a non-certified auction entity shall be submitted to FSC for a case by case analysis.  |   |

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| <b>Code</b>  | INT-STD-40-004_35 |
| <b>Requirement (s)</b>   | Clause 1.6        |
| <b>Publication date</b>  | 08 September 2017 |
| <p><b>How should an FSC-certified organization proceed if a supplier notifies that certain products delivered to the organization are non-conforming products? Shall the organization also apply the non-conforming procedures, even if the non-conformity was caused by a supplier?</b></p> <p>Yes. Once an FSC-certified organization is aware that a certain product received does not conform to certification requirements, it shall treat such products as non-conforming inputs and apply the requirements specified in Clause 1.6 of FSC-STD-40-004 V3-0 ensuring that they are not sold as being FSC certified.</p> |                   |

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| <b>Code</b>   | INT-STD-40-004_42 |
| <b>Requirement (s)</b>  | Clause 1.7        |
| <b>Publication date</b>   | 02 April 2019     |
| <p><b>What does a sample mean in the context of transaction verification?</b></p> <p>As a default, a 'sample' is defined as all transactions in a specified period of time. The sample can include all trading partners or be specific to a product type, product group, species, region, and/ or group of customers or suppliers. FSC may pre-determine the type of sample to be taken in a given investigation, which may include instructions on sample size (all or parts of transactions), sampling method (e.g. random, systematic), and if the transactions should be provided in a list of individual transactions or aggregated across the specified period.</p> |                   |

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| <b>Code</b>  | INT-STD-40-004_43 |
| <b>Requirement (s)</b>   | Clause 1.7        |
| <b>Publication date</b>  | 22 July 2019      |
| <p><b>Does <i>providing samples of FSC transaction data</i> mean that the samples shall be taken off-site by an ASI and/or a CB auditor for transaction verification purposes?</b></p> <p>Yes, a CB and/or ASI shall collect and take the requested samples off-site for the purpose of transaction verification, which includes transmission of the data to ASI and storage in ASI's Transaction Verification Tool.</p> <p>Note 1: ASI's Transaction Verification Tool is an online transaction matching tool managed by ASI. Transaction data uploaded to the system is automatically matched with other transactions of the specified period in the current Transaction Verification (TV) Loop, in order to identify imbalances in declared inputs and outputs.</p> <p>Note 2: FSC, ASI and CB each are responsible to have processes in place for ensuring that personal data and confidential business data collected and taken off-site is processed and protected in compliance with applicable mandatory laws.</p> |                   |

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| <b>Code</b>  | INT-STD-40-004_37 (also published under FSC-STD-20-007 with code INT-STD-20-007_47) |
| <b>Requirement (s)</b>   | Clause 2.4 of FSC-STD-40-004; Definition 'Joint certification' of FSC-STD-20-007    |
| <b>Publication date</b>  | 07 February 2018  |
| <p><b>Can wood be considered as FSC-certified in cases where an organization (e.g. a logger) buys non-certified standing wood that is afterwards included in the scope of a FM/CoC certification?</b></p> <p>Yes, the wood may be considered as FSC-certified under the following conditions:</p> <ul style="list-style-type: none"> <li>- the Forest Management Unit has to be FM/CoC certified at the time of harvesting</li> <li>- the seller (FM/CoC organization) provides the buyer (CoC organization) with supplementary documentation in accordance with Clause 5.7 of FSC-STD-40-004 V3-0.</li> </ul> |   |

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| <b>Code</b>   | INT-STD-40-004_50 (also published under FSC-STD-20-011 with code INT-STD-20-011_30) |
| <b>Requirement (s)</b>  | FSC-STD-40-004 V4-0 Clause 4.4<br>FSC-STD-20-011 V4-1 Table B Clause 4 h)           |
| <b>Publication date</b>   | 02 December 2020  |
| <p><b>Can an organization that makes custom manufactured products (e.g. woodworkers, building contractors, construction companies) choose to not present volumes (e.g. in m<sup>3</sup>) in their overview of job orders or construction projects?</b></p> <p>Yes, organizations that make custom manufactured products may present the annual volume summary as an overview of the job orders or construction projects instead of by product group covering the previous reporting period and other requirements as specified in Clause 4.4.</p> <p>When the organization is reporting only an overview of job orders or construction projects and not the annual volume summary, the certification body may meet the reporting requirements of FSC-STD-20-011 PART III Table B Clause 4 h) by including the total number of jobs orders presented in the overview of custom projects.</p> |   |

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| <b>Code</b>   | INT-STD-40-004_52         |
| <b>Requirement (s)</b>  | Clauses 5.1, 5.7 and 11.1 |
| <b>Publication date</b>   | 05 July 2021              |
| <p><b>Can organizations that sell FSC certified and labelled products on (or through) online marketplaces/ e-commerce sites and not having access to information to identify their ultimate customers (such as name and contact information) use mechanisms other than sales/delivery documents to record and pass on information regarding the FSC claims?</b></p> <p>Yes, organizations selling FSC certified and labelled products via online marketplaces/e-commerce sites and not having access to their customer contact information can use a combination of existing sales/delivery documents and internal sales records to record and pass on information regarding FSC claims. In the absence of sales/delivery documents, the internal sales records shall meet the requirements of Clauses 5.1 and 5.7.</p> |                           |

NOTE 1: For Clause 5.1 b) information identifying the online marketplace/e-commerce site can be used instead of information to identify the consumer.

NOTE 2: When the date of sale to the end customer is not available or confirmed, the date of product placement on the e-commerce site/online marketplace can be used instead.

NOTE 3: In the absence of sales/delivery documents, the customers cannot further pass on the FSC claims.

The internal sales record shall be maintained up to date and presented to certification body auditors in addition to existing sales/delivery documentation. Upon request, the sales record shall be made available to the customer.

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| <b>Code</b>   | INT-STD-40-004_44               |
| <b>Requirement (s)</b>  | Clauses 5.1; 7.3; 11.1 and 11.2 |
| <b>Publication date</b>   | 17 September 2019               |
| <b>Can an FSC-certified organization make claims on sales documents regarding the FSC certified packaging used for its products (FSC-certified or not)?</b>   |                                 |
| <p>An FSC-certified organization may establish an FSC product group for FSC certified packaging purchased from a certificate holder, for the purpose of controlling FSC output claims and labelling provided that:</p> <ol style="list-style-type: none"> <li>1) All components of the FSC certified packaging are FSC-certified (e.g. folding box and a wrapping paper) and;</li> <li>2) The FSC-certified organization ensures that sales documents include information on the FSC product group “Packaging” and the relevant FSC claim. Some examples of information on sales documents: <ul style="list-style-type: none"> <li>- Packaging: FSC Mix 70%;</li> <li>- “Product name”: FSC Mix Credit / Packaging: FSC Mix 70%;</li> <li>- “Product name” and packaging: FSC Mix Credit</li> </ul> </li> </ol> <p>The FSC-certified organization may omit the percentage or credit information in sales documentation (e.g. using “FSC Mix” claim only instead of “FSC Mix 70%” or “FSC Mix Credit”). In this case, however, the percentage or credit information cannot be passed along the supply chain by certificate holders.</p> <p>Note: The organization may label or promote the FSC-certified packaging following the requirements specified in FSC-STD-50-001.</p> |                                 |

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| <b>Code</b>   | INT-STD-40-004_32 |
| <b>Requirement (s)</b>  | Clause 5.6        |
| <b>Publication date</b>   | 08 September 2017 |
| <b>Clause 5.6 specifies that organizations may only sell products with the ‘FSC Controlled Wood’ claim to customers that are FSC certified. Are certificate holders also allowed to sell FSC Controlled Wood to project applicants according to FSC-STD-40-006?</b> |                   |

Yes. Since FSC Controlled Wood is an eligible input in project certification, CoC certificate holders can sell products with FSC Controlled Wood claims on sales documents to FSC project applicants.

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| <b>Code</b>  | INT-STD-40-004_46 |
| <b>Requirement (s)</b>   | Clause 5.8        |
| <b>Publication date</b>  | 06 March 2020     |
| <p><b>Is it acceptable that organizations supplying the construction sector make partial FSC claims on supplementary documents for custom manufactured FSC products such as construction components (e.g. dam walls) and assembled products (e.g. window frames) if these products also contain components of other forest certification schemes?</b></p> <p>Yes, organizations supplying construction components or components of assembled products to the construction sector which contain FSC certified material may make FSC claims on supplementary documents only.</p> <p>These components are, however, not eligible to carry the FSC label and cannot be promoted as FSC-certified. FSC claims shall identify which specific components are certified and shall not be used in a way that implies equivalence to other forest certification schemes (e.g. Window frame FSC 100% &amp; XX% ABCD). All elements of the FSC claims shall meet the requirements as specified in FSC-STD-40-004.</p> <p>Examples of FSC-certified components with FSC claims:</p> <ul style="list-style-type: none"> <li>• Door core-oriented strand board, FSC Mix Credit, XX-COC-000000</li> <li>• Door Frame MDF, FSC Mix 70%, XX-COC-000000</li> <li>• Door Wing solid oak FSC 100%, XX-COC-000000</li> </ul> <p>Note: A 'Partial claim' is an FSC claim which refers to only stated FSC-certified components or components of an assembled product that are FSC-certified and have a functional purpose. They do not refer to components covered under other forestry certification schemes.</p> <p>Note: The objective of the interpretation is to enhance the transparency of sales of FSC-certified components and components of assembled products if they are also certified by other forest certification schemes.</p> |                   |

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| <b>Code</b>   | INT-STD-40-004_36 |
| <b>Requirement (s)</b>  | Clause 7.2, NOTE  |
| <b>Publication date</b>   | 08 September 2017 |
| <p><b>The Note under Clause 7.2 specifies that different types of wood pulp are considered as equivalent input materials. Does this mean that virgin and reclaimed wood fibre are considered as equivalent input materials and can be substituted in FSC credit accounts?</b></p> <p>No. Virgin and reclaimed wood fibre are not considered as equivalent input materials and therefore cannot be substituted in FSC credit accounts. There are references in the CoC standard that make a distinction between virgin and reclaimed materials (see Note under</p> |                   |

Clause 5.9, Table D, definitions of FSC Mix and FSC Recycled), indicating that they are not equivalent materials. They can be combined in the same credit account in the case of products that are made with both materials (mixed fibres). However, for 100% recycled products, the FSC credit shall only be taken from the reclaimed input materials. The same applies to 100% virgin fibre products, where the credits shall only be taken from virgin input materials.

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| <b>Code</b>             | INT-STD-40-004_38 |
| <b>Requirement (s)</b>  | Box 4, d)         |
| <b>Publication date</b> | 01 August 2018    |

**Can a trader buy firewood logs and sell them as pulp logs?**

No, buying firewood and selling it as pulpwood would represent an upgrading of product quality, which is not allowed according to FSC standards.

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| <b>Code</b>   | INT-STD-40-004_39 |
| <b>Status</b> | Withdrawn         |

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| <b>Code</b>             | INT-STD-40-004_40 |
| <b>Requirement (s)</b>  | Clause 7.3        |
| <b>Publication date</b> | 01 August 2018    |

**Can organizations specify it their product groups species and products that they are not able to source, produce and/or sell?**

No, organizations shall only include in their product groups the products and species that they sold with FSC claims since the last assessment by the certification body and the ones that are feasible to be supplied with FSC claims. Since Certification Bodies are required to approve product groups of their clients, they also have a role in analyzing and making a judgement on whether the information provided by the organization makes sense with regards to commercial and legal availability and can be approved as product group.

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| <b>Code</b>             | INT-STD-40-004_41 |
| <b>Requirement (s)</b>  | Clause 7.3        |
| <b>Publication date</b> | 01 August 2018    |

**Can an organization specify in its product group list a copy of the species list information from its suppliers, without any consideration of whether these species are or will actually be supplied?**

In principle, it is not a problem when an organization declares the same species scope as its supplier, as it is dependant on the species information provided by their suppliers. However, when establishing its product groups, organizations shall refer to the species that they actually sourced or will be able to source from their suppliers.

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| <b>Code</b>             | INT-STD-40-004_48 |
| <b>Requirement (s)</b>  | Clause 10.2       |
| <b>Publication date</b> | 30 June 2020      |

**An FSC certified organization (sawmill) processes logs to produce two output product groups: lumber and residuals (woodchips and sawdust). Since both output product groups originated from the same raw input material (logs), can the sawmill opt to allocate all the output credits into the credit account of one of these two output product groups?**

Yes, this is possible provided that the relevant product groups are established (i.e. lumber, woodchips and sawdust) and the output product group that receives all the credits can be produced from the other output product group that donates these credits (i.e. lumber processed into woodchips/sawdust). For example, at a sawmill, woodchips and sawdust could be produced from lumber, while the reverse is not possible. In such a situation, the organization may choose to allocate all output credits of the input material (logs) to the credit account of the product group containing the residuals.

The maximum amount of output credit that can be allocated to the credit account of the product group containing the residuals shall be determined by applying the applicable conversion factor reflecting the quantity of residuals that would be available if an entire log were converted into residuals.

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| <b>Code</b>  | INT-STD-40-004_45 |
| <b>Requirement (s)</b>   | Clause 10.3 e)    |
| <b>Publication date</b>  | 17 September 2019 |
| <p><b>1)What does the term “used” mean in the context of 10% of the input credits used by its own site?</b></p> <p><b>2)Can a Central office (CO) maintain a centralized credit account, when the CO does all the purchasing and selling? Operational sites are the ones physically receiving, transforming and shipping the material.</b></p> <p>1) Using input credits from a centralized credit account by a participating site means to deduct them from the centralized credit account for the purpose of selling material produced at that site with relevant credit claims. In order to be eligible to “use” a certain amount of input credits, a participating site shall have contributed over a 12-month period at least 10% of those credits through claim-contributing input materials that have been physically received in its own facilities. The remaining 90% of the used input credits can come from transferred (virtual) input credits.”</p> <p>2) In the situation where the Central Office (CO) maintains a centralized credit account, the contribution of input credits cannot be demonstrated through relevant purchase documents. In this case, relevant delivery documents need to be checked for this purpose.</p> |                   |

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| <b>Code</b>   | INT-STD-40-004_31 |
| <b>Requirement (s)</b>  | Clause 10.5       |
| <b>Publication date</b>   | 15 March 2017     |
| <p><b>Clause 10.5 of FSC-STD-40-004 V3-0 contains a reference to high-quality components. How is quality defined in this case?</b></p> <p>In the context of this clause, the following criteria define quality:</p> |                   |

- All products that are made of chip and particles of wood are considered as having the same quality;
- Solid wood components are considered as having a higher quality than components of chip and particles of wood;
- Solid hardwood is considered as having higher quality than softwood.


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| <b>Code</b>   | INT-STD-40-004_33 |
| <b>Requirement (s)</b>  | Clause 12.5       |
| <b>Publication date</b>   | 08 September 2017 |
| <p><b>Clause 12.5 requires organizations to provide documented procedures to their outsourcing contractors. Is this requirement applicable when the contractor is FSC certified and has included outsourcing activity in its certificate scope?</b></p> <p>No. Clause 12.5 is only applicable in the case of non FSC-certified contractors.</p> |                   |

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| <b>Code</b>  | INT-STD-40-004_34 |
| <b>Requirement (s)</b>   | Clause 14.1 b     |
| <b>Publication date</b>  | 08 September 2017 |
| <p><b>Do the “common operational procedures” specified in Clause 14.1 b have to cover procedures that go beyond those related solely to certification?</b></p> <p>Yes. The term “common operational procedures” should not be confused with “common certification procedures”. The standard provides some examples of common operational procedures, such as same production methods, same product specifications, same integrated management software, which go beyond those related solely to FSC certification.</p> |                   |



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| <b>Code</b>   | INT-STD-40-004_47   |
| <b>Requirement (s)</b>  | FSC-STD-40-004, Annex C, definition of scope.<br>FSC-STD-20-011 V4.0. clause 2.6 e) |
| <b>Publication date</b>   | 30 June 2020  |
| <p><b>Can a CoC certificate holder (CoC-CH) include logging and harvesting activities (e.g. buying standing trees) under the scope of their chain of custody certification? Can they sell FSC-certified products?</b></p> <p>Yes, a CoC certificate holder can include logging and harvesting activities under the scope of its chain of custody certification, and sell FSC-certified forest products with FSC claims or use it as input for CoC-certified production or processes, provided that the certificate holder has the legal ownership of the timber at the time of harvest.</p> <p>There are two main scenarios for a CoC-CH with logging and harvesting activities in the certification scope:</p> <ol style="list-style-type: none"> <li>1) A logger is the CoC-CH and is buying and subsequently harvesting standing trees, regulated by a contract between the logger and the FM-certified Organization. The logger is taking legal ownership of FSC-certified material and therefore needs to be certified.</li> <li>2) A timber trader or processor is the CoC-CH and is outsourcing the harvesting activities to a logger through an outsourcing agreement under the scope of certification. In this case, the logger does not take legal ownership of FSC-certified material and therefore does not need to be certified.</li> </ol> <p>In both scenarios, the certification body of the CoC-CH shall visit log landings or timber storages if there is a risk that material from uncertified or uncontrolled sources could enter or where FSC certified or controlled material could leave the system (i.e. critical control points).</p> <p>The FM-certified Organization is responsible for ensuring conformance of all activities within the certified MU with the applicable forest stewardship standard. This also refers to activities conducted by other persons or entities. It is the responsibility of the certification body of the FM-certified Organization to assure this conformance.</p> |   |

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| <b>Code</b>   | INT-STD-40-004_51                                 |
| <b>Requirement (s)</b>  | FSC-STD-40-004 V4-0 Annex C Terms and Definitions |
| <b>Publication date</b>   | 02 December 2020                                  |
| <p><b>Can wooden chips and pellets be considered as ‘finished products’?</b></p> <p>FSC-STD-40-004 V3-0 defines ‘Finished product’ as “A product that will not undergo further transformation in terms of processing, labelling, or packaging prior to its intended end use or sale to the end-user. Installation of finished products, the filling of packaging, and cutting to size are not considered product transformation, unless these activities involve repackaging, changing of the FSC product composition, or relabeling.</p> |   |



NOTE: Some products may or may not be classified as a finished product depending on the intended use by the customers. For example, lumber or paper does not classify as a finished product if sold to a manufacturer that will further transform these materials into other products.”

The note following the definition further clarifies that for some products the classification for a finished product would depend on the intended use by the customer and would need to be evaluated on a case by case basis.

Wood chips and pellets may be considered as a finished or semi-finished product, depending on the intended use by the customer. If there is any repackaging involved or change in the product composition (e.g. wood pellets being powdered) or relabelling before being sold further down the supply chain, then it could be considered as a semi-finished product. However, if the customer is purchasing the wood pellets for direct use (e.g. burning them for energy generation), and it does not undergo further transformation, it would be considered as a ‘finished product’ at the point of sale.


## **FSC-STD-40-006 (V1-0) FSC CHAIN OF CUSTODY STANDARD FOR PROJECT CERTIFICATION**

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| <b>Code</b>  | INT-STD-40-006_03 (also published under FSC-STD-40-007 with code INT-STD-40-007_02) |
| <b>Requirement (s)</b>   | Clauses 2.3; 5.4d; 6.2; 6.3; 7.2; 8.3; 8.5; 9.1d; 9.2.                              |
| <b>Publication date</b>  | 05 September 2014   |
| <p><b>Do we need to apply <i>FSC-STD-40-007 Sourcing reclaimed material for use in FSC Product Groups or FSC Certified Projects</i> when assessing reclaimed material for use under project certification?</b></p> <p>Yes, FSC-STD-40-007 shall be applied to purchase, verify and classify reclaimed forest-based inputs for use in FSC Certified Projects. This mainly applies to the following clauses of FSC-STD-40-006:</p> <p>2.3, 5.4d, 6.2, 6.3, 7.2, 8.3, 8.5, 9.1d, 9.2.</p> |   |

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| <b>Code</b>   | INT-STD-40-006_01 |
| <b>Requirement (s)</b>  | Clause 9.2.b      |
| <b>Publication date</b>   | 07 August 2012    |
| <p><b>Are project certification applicants allowed to implement a controlled wood verification program according to FSC-STD-40-005 and source controlled materials for the project?</b></p> <p>Yes. Project certification applicants are allowed to implement a controlled wood verification program according to FSC-STD-40-005.</p> |                   |

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| <b>Code</b>  | INT-STD-40-006_02 |
| <b>Requirement (s)</b>   | Part 4            |
| <b>Publication date</b>  | 05 September 2014 |
| <p><b>Do we need to apply <i>FSC-STD-50-001 Requirements for use of the FSC trademarks by Certificate Holders</i> for project certification?</b></p> <p>Yes, for use of the FSC trademarks FSC-STD-50-001 shall be applied. Requirements of Annex 2 of FSC-STD-50-001 replace requirements of Part 4 of the project certification standard (FSC-STD-40-006).</p> |                   |

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| <b>Code</b>             | INT-STD-40-006_04 (also published under FSC-STD-40-004 with code INT-STD-40-004_19) |
| <b>Requirement (s)</b>  | Annex 1   |
| <b>Publication date</b> | 05 September 2014   |

**Do the terms FSC-pure and FSC-mixed still apply?**

No, the terminology for claims was updated in FSC-STD-40-004 V2-1. FSC-pure is now referred to as FSC 100%; FSC-mixed as FSC Mix.

## **FSC-STD-40-007 (V2-0) SOURCING RECLAIMED MATERIAL FOR USE IN FSC PRODUCT GROUPS OR FSC CERTIFIED PROJECTS**

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| <b>Code</b>  | INT-STD-40-007_02 (also published under FSC-STD-40-006 with code INT-STD-40-006_03) |
| <b>Requirement (s)</b>   | Scope   |
| <b>Publication date</b>  | 05 September 2014   |
| <p><b>Do we need to apply <i>FSC-STD-40-007 Sourcing reclaimed material for use in FSC Product Groups or FSC Certified Projects</i> when assessing reclaimed material for use under project certification?</b></p> <p>Yes, FSC-STD-40-007 shall be applied to purchase, verify and classify reclaimed forest-based inputs for use in FSC Certified Projects. This mainly applies to the following clauses of FSC-STD-40-006:</p> <p>2.3, 5.4.d), 6.2, 6.3, 7.2, 8.3, 8.5, 9.1.d), 9.2.</p> |   |

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| <b>Code</b>  | INT-STD-40-007_01 |
| <b>Requirement (s)</b>   | Clause 3.5        |
| <b>Publication date</b>  | 07 August 2012    |
| <p><b>Companies that use post-consumer reclaimed material inputs may identify small amount of pre-consumer contamination in the material bundle on receipt. Does this material count as a mixture of pre- and post-consumer reclaimed material and therefore require the supplier to be included in a supplier audit program as per clause 3.5 of FSC-STD-40-007 V2-0?</b></p> <p>Where sporadically the buyer of post-consumer material identifies a small amount of unintentional pre-consumer contamination included in the shipment, this is not considered a mix of pre- and post-consumer reclaimed material as described in clause 3.5 of FSC-STD-40-007 V2-0. In this case, the company shall quantify the amount of pre-consumer material contamination and deduct this amount from the post-consumer volume.</p> |                   |

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| <b>Code</b>   | INT-STD-40-007_03 |
| <b>Requirement (s)</b>  | Clause 4.3        |
| <b>Publication date</b>   | 08 September 2017 |
| <p><b>Is it acceptable for an organization to purchase a manufactured component of a product (e.g. paper bag handle) or manufactured products made of reclaimed material and to include the manufacturers of the components or products in the supplier audit program?</b></p> <p>No, organizations are not allowed to include manufacturers in the supplier audit program. Manufacturers of reclaimed products or product components need to obtain CoC certification.</p> |                   |

## PROCEDURES

### **FSC-PRO-20-001 (V1-1) EVALUATION OF THE ORGANIZATION'S COMMITMENT TO FSC VALUES AND OCCUPATIONAL HEALTH AND SAFETY IN THE CHAIN OF CUSTODY**

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| <b>Code</b>   | INT-PRO-20-001_01 (also published under FSC-STD-20-011 with code INT-STD-20-011_12) |
| <b>Requirement (s)</b>  | Sections 1 and 3  |
| <b>Publication date</b>   | 11 February 2016; amended 28 April 2016   |
| <p><b>How are CBs required to verify that a certificate holder (CH) demonstrates its commitment to comply with the values of FSC as defined in the “Policy for the Association of Organizations with FSC” (FSC-POL-01-004)?</b></p> <p>CBs have to verify (audit) the CH’s commitment to comply with the values of FSC as defined in the Policy for Association according to FSC-STD-40-004 V2-1 Clause 1.5.1. This needs to be done by evaluating the existence of a self-declaration signed by the CH (FSC-PRO-20-001 V1-1 Section 3).</p> <p>See also INT-PRO-20-001_02 for situations of evidenced infringements of the Policy for Association.</p> |   |

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| <b>Code</b>   | INT-PRO-20-001_02 (also published under FSC-STD-20-011 with code INT-STD-20-011_14) |
| <b>Requirement (s)</b>  | Sections 1 and 3  |
| <b>Publication date</b>   | 28 April 2016   |
| <p><b>Shall the CB raise corrective action requests (CARs) to a CoC certificate holder (CH) if there is objective evidence for infringements of the Policy for Association?</b></p> <p>If the CB witnesses evidence of infringements of the FSC Policy for Association in the audit (FSC-PRO-20-001 V1-1 Section 1) or detects such evidence through other means such as by reviewing (evaluating) complaints, disputes or allegations of nonconformity received from stakeholders (FSC-STD-20-011-V2-0 Clause 2.7d), the CB shall record the evidence for infringements in the audit report and alert FSC International about a potential non-compliance with the FSC Policy for Association for further evaluation.</p> <p>The CB shall not raise CARs about infringements of the FSC Policy for Association to the CH as relevant conclusions are the subject matter of FSC International and require a decision by the international FSC Board of Directors.</p> <p>If, however, the evidenced infringements of the Policy for Association also indicate nonconformities with applicable FSC certification requirements, the CB shall raise CARs accordingly.</p> |   |

## DIRECTIVES

### **FSC-DIR-40-004 DIRECTIVE ON CHAIN OF CUSTODY CERTIFICATION**

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| <b>Code</b>  | INT-DIR-40-004_05 |
| <b>Requirement (s)</b>   | ADVICE-40-004-03  |
| <b>Publication date</b>  | 19 May 2014       |
| <p><b>May the claim “registered” for chip and fibre components of product groups with a reduced labelling threshold of 50% be passed on along several organizations of a supply chain?</b></p> <p>Yes, the claim “registered” may be passed on according to the requirements of Advice 3 of ADVICE-40-004-03 together with the “registered” material / products.</p> |                   |

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| <b>Code</b>  | INT-DIR-40-004_01 (also published in FSC-STD-40-004 with code INT-STD-40-004_08) |
| <b>Requirement (s)</b>   | ADVICE-40-004-05   |
| <b>Publication date</b>  | 18 April 2011  |
| <p><b>Is it acceptable that the FSC Claims are abbreviated (e.g. FSC Mix Cred) due to space constraints in invoices?</b></p> <p>Yes, with the condition that:</p> <ul style="list-style-type: none"><li>a) The abbreviation of FSC Claims is clearly defined in the organization’s documented procedures, and</li><li>b) The complete FSC claim is provided to customers through supplementary evidence, as defined in ADVICE-40-004-05 of FSC-DIR-40-004.</li></ul> |  |

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| <b>Code</b>  | INT-DIR-40-004_04 |
| <b>Requirement (s)</b>   | ADVICE-40-004-06  |
| <b>Publication date</b>  | 07 August 2012    |
| <p><b>Do all NTFP (non-timber forest product) ingredients/components of a product need to be certified?</b></p> <p>No. For NTFP products, it is acceptable that only one ingredient/component is FSC certified as long as clear reference to the certified ingredient/component is made on the FSC label and/or associated statements.</p> |                   |

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| <b>Code</b>   | INT-DIR-40-004_03 |
| <b>Requirement (s)</b>  | ADVICE-40-004-06  |
| <b>Publication date</b>   | 07 August 2012    |
| <p><b>Do NTFP (Non-timber forest product) components in a wood-based product (e.g. a rattan seat in a wooden chair) need to be certified?</b></p> <p>The use of a non-certified NTFP component in a wood-based product is acceptable where the components are distinguishable and the FSC label specifies wood as the certified component. Where the forest-based components are not distinguishable (e.g. a paper containing both NTFP and wood), both shall be certified in order to carry the FSC label.</p> |                   |

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| <b>Code</b>  | INT-DIR-40-004_02 |
| <b>Requirement (s)</b>   | ADVICE-40-004-06  |
| <b>Publication date</b>  | 22 March 2012     |
| <p><b>Does the release paper in envelopes need to be FSC certified?</b></p> <p>No. The envelope is the main product and needs to be FSC certified. The release paper has a secondary function and its certification is optional.</p> |                   |





Forest Stewardship Council®

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