



Forest Stewardship Council®



# Interpretations of the normative framework

CHAIN OF CUSTODY

~~09 April~~01 August 2018



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## STANDARDS

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

<b>Code</b>	INT-STD-20-011_04
<b>Requirement (s)</b>	Clauses 2.7 and 8.4
<b>Publication date</b>	21 November 2013
<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>	

<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</p>	

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.

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
<p><b>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?</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>a) evidence of nonconformities of the CH with any FSC certification requirements applicable to the scope of certification; or</li> <li>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.</li> </ul> <p>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.</p> <p>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.</p>	

<b>Code</b>	INT-STD-20-011_02
<b>Requirement (s)</b>	Clause 2.7e
<b>Publication date</b>	23 April 2013
<p><b>Is it acceptable to audit loggers through desk audit when the logger does not have a log yard to visit?</b></p> <p>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</p>	

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 because 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).

<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>	

<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>	

<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.

<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.

<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**

<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>	

<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>	

<b>Code</b>	INT-STD-20-011_16
<b>Requirement (s)</b>	Table B, Clause 2 e) and Footnote 6
<b>Publication date</b>	11 November 2016
<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**

<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>	

<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>	

<b>Code</b>	<u><a href="#">INT-STD-20-011_23</a></u>
<b>Requirement (s)</b>	<u><a href="#">Clause 4.3.16</a></u>
<b>Publication date</b>	<u><a href="#">01 August 2018</a></u>
<p><b><u><a href="#">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?</a></u></b></p> <p><u><a href="#">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.</a></u></p>	

<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

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?
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?
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?

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.
2. The occurrence of an additional audit after sourcing commences depends on the risk identified in the DDS:
  - 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.
  - 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.
  - 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.

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.

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.

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:
  - 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.
  - 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.

<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>	

<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>	

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

<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>	

<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>	

<b>Code</b>	INT-STD-40-003_04
<b>Requirement (s)</b>	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. 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>	

<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>	

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

<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>	

<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>	

<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>	

<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.

<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.

<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.

<b>Code</b>	INT-STD-40-004_23
<b>Requirement (s)</b>	Clause 2.1.1
<b>Publication date</b>	24 July 2015

**Can a COC certificate holder establish a product group list that includes products that are not eligible to be sold with an FSC claim?**

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.

<b>Code</b>	INT-STD-40-004_05
<b>Requirement (s)</b>	Clause 2.1.2b
<b>Publication date</b>	15 April 2011

**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.**

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.

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:

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.
2. from credit to percentage system: the remaining credits from the credit account cannot be used as input for the percentage system.

<b>Code</b>	INT-STD-40-004_09
<b>Requirement (s)</b>	Clause 2.1.3
<b>Publication date</b>	18 April 2011

**Is it acceptable to define credit system product groups by FSC claim and product type only, with no regard to input characteristics?**

For example, a door manufacturer produces the following door types:

- a) Solid wood door – sawn material components, dowels as minor components
- b) Sandwich door Type 1 – sawn material components, veneer, skins, chip board
- c) Sandwich door Type 2 – sawn material components, veneer, fiber board, chip board, honey comb

**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.

<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.

<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

<b>Code</b>	INT-STD-40-004_28
<b>Requirement (s)</b>	4.1.1
<b>Publication date</b>	01 July 2016

**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?**

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.

<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

**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?**

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.

<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

**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?**

**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?**

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.

<b>Code</b>	INT-STD-40-004_24
<b>Requirement (s)</b>	Clause 6.1.1
<b>Publication date</b>	24 July 2015
<p><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></p> <p>Yes, but it must be clear which code belongs to the organization issuing the invoice and which is the suppliers' code.</p>	

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

<b>Code</b>	INT-STD-40-004_16
<b>Requirement (s)</b>	Clause 6.1.1
<b>Publication date</b>	23 April 2013
<p><b>Is the FSC Mix 100% claim allowed?</b></p> <p>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.</p>	

<b>Code</b>	INT-STD-40-004_12
<b>Requirement (s)</b>	6.1.1f
<b>Publication date</b>	05 September 2011

**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?**

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.

<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

**Is it acceptable that the FSC Claims are abbreviated (e.g. FSC Mix Cred) due to space constraints in invoices?**

Yes, with the condition that:

- a) The abbreviation of FSC Claims is clearly defined in the organization's documented procedures, and
- b) The complete FSC claim is provided to customers through supplementary evidence, as defined in ADVICE-40-004-05 of FSC-DIR-40-004.

<b>Code</b>	INT-STD-40-004_07
<b>Requirement (s)</b>	Clause 6.1.1
<b>Publication date</b>	18 April 2011

**In which language shall the FSC claims on sales and delivery documents be written?**

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.

<b>Code</b>	INT-STD-40-004_06
<b>Requirement (s)</b>	Clause 6.1.1
<b>Publication date</b>	15 April 2011

**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?**

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

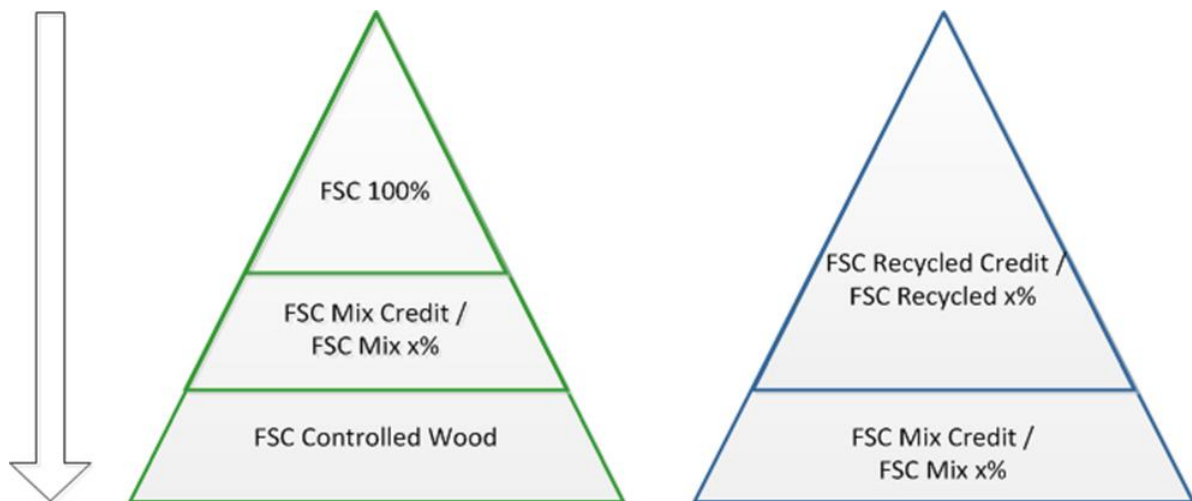
schemes shall not be merged. All elements of the FSC claim must be comprehensible and easily identifiable.

<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.



<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.

<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>	

<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>	

<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.

Inputs	FSC 100%	FSC Mix Credit	FSC Mix x%	FSC Recycled Credit	FSC Recycled x%	Pre-cons. reclaimed wood	Pre-cons. reclaimed paper	Post-cons. reclaimed wood and paper	FSC Controlled Wood
FSC 100%	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
FSC Mix Credit	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
FSC Mix x%	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
FSC Recycled Credit	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
FSC Recycled x%	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
Pre-cons. reclaimed wood	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
Pre-cons. reclaimed paper	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
Post-cons. reclaimed wood and paper	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
FSC Controlled Wood	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

<b>Code</b>	INT-STD-40-004_13
<b>Requirement (s)</b>	Clause 9
<b>Publication date</b>	01 December 2011

**Are traders authorized to apply the credit system for trading of unfinished products?**

Traders can apply the credit system on the level of a trading office site under the following conditions:

- 1) For the trade of primary products (e.g. logs, chips), and
- 2) Exclusive for domestic trading (at national level), and
- 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


4) The trade of FSC certified products is always linked to a physical delivery of products. Virtual transfers of certified products are prohibited.

<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>	

<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>	

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

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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**

<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>	

<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>	

<b>Code</b>	INT-STD-40-004_32
<b>Requirement (s)</b>	Clause 5.6
<b>Publication date</b>	08 September 2017
<p><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></p> <p>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.</p>	

<b>Code</b>	INT-STD-40-004_36
<b>Requirement (s)</b>	Clause 7.2, NOTE
<b>Publication date</b>	08 September 2017

**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?**

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 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.

<b>Code</b>	<u>INT-STD-40-004 38</u>
<b>Requirement (s)</b>	<u>Box 4, d)</u>
<b>Publication date</b>	<u>01 August 2018</u>

**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.

<b>Code</b>	<u>INT-STD-40-004 39</u>
<b>Requirement (s)</b>	<u>Clause 7.3</u>
<b>Publication date</b>	<u>01 August 2018</u>

**The CoC standard specifies that species information shall be specified in product groups when they designate the product characteristics. What is the FSC interpretation of this requirement?**

Species information is not relevant in the case of reclaimed and printed materials and products. In all other cases, species information designates the product characteristics and therefore, need to be specified in product group lists.

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

**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 and can be approved as product group.

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

<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> <ul style="list-style-type: none"> <li>• All products that are made of chip and particles of wood are considered as having the same quality;</li> <li>• Solid wood components are considered as having a higher quality than components of chip and particles of wood;</li> <li>• Solid hardwood is considered as having higher quality than softwood.</li> </ul>	

<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>	

<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>	

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

<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>	

<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>	

<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>	

<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

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**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**

<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>	

<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>	

<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**

<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>	

<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

<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>	

<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>	

<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>	

<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>	

<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>	



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