# INTERPRETATIONS OF THE NORMATIVE FRAMEWORK

FOREST MANAGEMENT

17/07/2026

FORESTS FOR ALL FOREVER

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# POLICIES

## FSC-POL-01-001 (2004) FSC POLICY FOR PILOT TESTS OF DRAFT FSC STANDARDS

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| **Code** | INT-POL-01-001_01 |
| **Requirement (s)** | Section 8 |
| **Publication date** | 10. July 2019 |

**A certificate holder (CH) is formally participating in a pilot test authorized by FSC to test draft requirements or a draft standard. During the annual audit, the CB identifies that the certificate holder (CH) is not in conformance with requirements (linked or overlapping with the draft test requirements) in the regular approved standard. In such a situation, shall the CB issue a non-conformity?**

No, during an authorized pilot test, the draft requirements or draft standard being tested temporarily replace the requirements in the approved standard the CH would normally be audited against. For the time of the pilot test, the participating CH shall be evaluated against the draft requirements or draft standard being tested. A certificate may be issued or maintained following the rules and regulations in Section 8 of FSC-POL-01-001 FSC Policy for pilot tests of draft FSC standards.

## FSC-POL-01-007 (V1-0) POLICY TO ADDRESS CONVERSION

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|---|---|
| **Code** | INT-POL-01-007_01 (also published with code INT-STD-30-010_01, INT-STD-20-012_01 and INT-PRO-01-007_01) |
| **Requirement (s)** | FSC-POL-01-007 V1-0 Scope<br>FSC-PRO-01-007 V1-0 Chapter 3, Sections 2, 18, 24, 25, Clauses 17.4.a; 17.4.d.i and Annex 5<br>FSC-STD-30-010 V3-0 Transition end date, Scope, indicators 54.2.2 and 54.2.3.<br>FSC-STD-20-012 V2-0 Definitions |
| **Publication date** | 09. September 2024 |

**a) Which remedy actions is the CW/FM producer certified against <FSC-STD-30-010 V2-0 FSC Controlled Wood Standard for Forest Management Enterprises> required to complete for the past conversions, based on the indicators 54.2.2 and 54.2.3 in <FSC-STD-30-010 V3-0 Controlled Forest Management> and on the requirements in <FSC-PRO-01-007 Remedy Framework>,**

**i. before the transition end date (31 Dec 2025) of V3-0 of <FSC-STD-30-010 Controlled Forest Management>; and**

**ii. before the step-up evaluation (see the definition in <FSC-STD-20-012 Controlled Forest Management Evaluations>)?**

**b) Is a CW/FM producer, which has converted natural forests to plantations between 1 December 1994 and 31 December 2020 required to restore these planted areas in a 1:1 ratio back to the natural forest?**

a) The CW/FM producer which has converted natural forest in the past and is subject to the indicators 54.2.2 or 54.2.3 of <FSC-STD-30-010 V3-0 Controlled Forest Management>, shall:

i. contact the Alternative Dispute Resolution & Remedy Team at FSC International at remedy@fsc.org and enter into an agreement with FSC in conformity with Chapter 3, Section 2 of the <FSC-PRO-01-007 Remedy Framework> before the end of the transition period of 31 Dec 2025, and

ii. have an approved Remedy Plan in accordance with Chapter 3, Sections 24 and 25 of <FSC-PRO-01-007 FSC Remedy Framework> in place. The remedy process shall have reached the Initial Implementation Threshold for the environmental and social remedy during the 5-year CFM certification period, before the producer is eligible for entering the step-up evaluation for the full forest management certification.

NOTE: The CW producer which was not involved in conversion but which has acquired Management Units where conversion has taken place between 1 December 1994 and 31 December 2020, shall demonstrate restitution of priority social harms and partial remedy of environmental harms in conformity with the indicator 54.2.3 in <FSC-STD-30-010 V3-0 Controlled Forest Management>, unless the acquirement was completed by a CW/FM certificate holder before the effective date of <FSC-POL-01-007 V1-0 Policy to Address Conversion> (1 July 2023), as specified in the scope of that policy.

b) Yes, in the case where the CW/FM producer has converted natural forests to plantations according to indicator 54.2.2 in <FSC-STD-30-010 V3-0 Controlled Forest Management> the remedy action shall be proportionate (1:1) to the size of the converted area and equivalent to the nature of environmental harm caused by the conversion, as

stated in the Chapter 3, Clause 17.4.d.i of the <FSC-PRO-01-007 FSC Remedy Framework>.

- The selection of the remedy site is specified in the Chapter 3, Clause 17.4a of the <FSC-PRO-01-007 FSC Remedy Framework>, stating that the first priority for the selection is the actual site of conversion.

The remedy action may be either restoration, or conservation as indicated in Chapter 3, Section 18 of the <FSC-PRO-01-007 FSC Remedy Framework>.

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|---|---|
| **Code** | INT-POL-01-007_02 (also published with code INT-PRO-01-007_02) |
| **Requirement (s)** | FSC-POL-01-007 V1-0 Policy to Address Conversion Scope, Point 3<br>FSC-PRO-01-007 V1-0 FSC Remedy Framework Chapter 3, Clause 2.2 and 30.6<br>FSC-POL-01-004 V2-0 Policy for the Association of Organizations with FSC Definitions for Direct Involvement and Indirect Involvement |
| **Publication date** | 29. January 2025 |

**a) Can an organization pursuing remedy for conversion of natural forest be responsible for partial remedy for a certain period of time when they had no involvement and full remedy for a certain time period when the organization had involvement, with the conversion taking place between 31 December 1994 and 31 December 2020?**

Yes, whether an organization is responsible for full or partial remedy depends on whether there was direct or indirect involvement of the company in the conversion, or not (see the Definitions for Direct Involvement and Indirect Involvement in FSC-POL-01-004 V2-0).

**b) May an organization which is part of a corporate group as defined by FSC-PRO-01-007 FSC Remedy Framework currently associated with FSC with no involvement in the conversion of a Management Unit (MU) sign the Remedy Agreement under Chapter 3, 2.1 of FSC-PRO-01-007 FSC Remedy Framework on behalf of The Organization when The Organization is part of the same corporate group?**

Yes, The Organization may permit a different organization which is part of the corporate group to sign the Remedy Agreement on their behalf if the corporate group is associated with FSC. The signatory in the corporate group shall assume the ultimate responsibility for the plan, implementation, and delivery of conservation and restoration outcomes and social benefits as described in 2.4 of FSC-PRO-01-007 FSC Remedy Framework.

NOTE: The association of the corporate group provides a safeguard that the organization in the corporate group is aligned with FSC’s core values and has not committed significant conversion as defined by the Policy for Association V2.

**c) If the associated corporate group signs the remedy agreement, shall they remedy all conversion across all MUs in the corporate group, or may they pursue remedy for individual MUs?**

The associated corporate group may select individual MUs to be remedied to become eligible for forest management certification and is not required to pursue remedy in all MUs in the corporate group.

**d) If The Organization held FSC forest management certification at the time the Policy to Address Conversion became effective, does the exception indicated in the point 3 in the Scope of that Policy still apply if the remedy agreement is signed by an organization in the corporate group on their behalf?**

Yes, if the Management Unit held FSC forest management certification at the time the Policy to Address Conversion became effective, remedy is not required to be carried out for the Management Unit if the legal entity signing the remedy agreement had no involvement in the conversion.

**e) Does The Organization's FSC forest management certification need to remain continuously valid from the time the Policy to Address Conversion became effective until it or its corporate group enters into a remedy agreement to take advantage of the exemption in point 3 in the Scope of Policy to Address Conversion?**

Yes, the certification must remain continuously valid for the exception to apply, unless there is a Remedy Agreement in place with FSC under 2.1 of FSC-PRO-01-007 FSC Remedy Framework and a remedy process is underway.

<u>**FSC-POL-20-003 (2004) THE EXCISION OF AREAS FROM THE SCOPE OF CERTIFICATION**</u>

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|---|---|
| **Code** | INT-POL-20-003_06 |
| **Requirement (s)** | Scope of the Policy |
| **Publication date** | 06. October 2015 |

**Are sales of land considered "excision" and covered by the Policy on Excision; or is this outside of the scope the Policy and instead considered a change in scope?**

The Policy on Excision does not apply to land sales. Land sales would constitute a change in scope of a certificate.

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|---|---|
| **Code** | INT-POL-20-003_08 |
| **Requirement (s)** | Scope of the Policy |
| **Publication date** | 03. June 2016 |

**Can we excise nurseries from the scope of certification, even if it is located within the FMU?**

Nurseries can be excised if the conditions for excision are met.

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|---|---|
| **Code** | INT-POL-20-003_10 |
| **Requirement (s)** | Scope of the Policy, FSC- POL-20-003 Clause 1.1; 1.2; 2.1 and 2.2 |
| **Publication date** | 19. June 2019<br>Revised in December 2019 to clarify situations where the Policy of Excision could apply to CW/FM certification |

**Does the Policy of Excision apply to Controlled Wood Forest Management certification?**

This depends on the situation.

The Policy of Excision can be applied to Controlled Wood Forest Management certification in situations where conformance with the applicable requirements are not met for reasons beyond the control of the forest manager (Clause 1.1, 2.1).

The Policy of Excision cannot be applied to Controlled Wood Forest Management certification in situations where the forest manager maintains management control over the area where conformance cannot be demonstrated (clause 1.2, 2.2). Rationale: INT-POL-20-003_02; clause 2.2.c requires that in situations where forest manager retains management control of excised area the CAB shall verify that management of the excised area conforms to requirements of FSC-STD-30-010.

| Code | INT-POL-20-003_04 |
|---|---|
| Requirement (s) | Section 1 |
| Publication date | 24. April 2015 |

**Where 'highly hazardous' pesticides (HHPs) are used, either by certificate holder (CH) or a 3rd party, in order to comply with national laws,**
**a) Must the CH apply for a derogation (even if applied by legal authorities)?**
**b) Can the CH excise the area (e.g. workers' camps, waterbodies) from the scope if it is a legal obligation (e.g. outside the control of the forest manager)?**
**c) In this scenario, is this a conflict between national laws and FSC rules as per Criterion 1.4, and if so, what should happen next?**

a) The use of a HHP to comply with national laws (eg. worker health protection) requires the submission of a derogation application, unless a public authority has ordered the use of that specific HHP or is directly applying it. In that case at a first stage the CH only needs to notify it according to the FSC-PRO-01-004 (V2-2) (revised with the code FSC-PRO-30-001). Later the Pesticides Committee might request the submission of a standard derogation application.
b) The applicability of FSC-POL-20-003 (Policy on the excision of areas from the scope of certification) has to be evaluated by the certification body (CB) on a case by case basis.
c) FSC has developed a special rule in the Pesticides Procedure that is applicable for such situation (see FSC-PRO-01-004 Section 8). The use of HHPs mandated or carried out by public authorities will be further clarified in the revised version (FSC-PRO-30-001).

| Code | INT-POL-20-003_11 |
|---|---|
| Requirement (s) | FSC-POL-20-003 Clause 1.1, 2.1, 3.1 |
| Publication date | 10. July 2019 |

**Do the FSC-POL-20-003 Clauses 1.1, 2.1, 3.1 apply to a situation where the forest owner/manager voluntarily relinquishes management control to a third party through a lease arrangement?**

No, if the forest owner/manager voluntary relinquishes management control through a lease arrangement, the management activities implemented by the lessee cannot be considered beyond the control of the forest owner/manager when evaluating the requirements of FSC-POL-20-003. In this situation the certificate holder would need to comply with sections 1.2, 2.2 and 3.2 of the Excision Policy.

| Code | INT-POL-20-003_13 |
|---|---|
| **Requirement (s)** | Section 2 |
| **Publication date** | 05.October 2020. |

**Where the Organization allows third parties (e.g. local community members or small private agricultural entrepreneurs) to temporarily use its management unit for intercropping (e.g. to diversify the local economy or to provide additional income sources for rural livelihoods):**

a) **Does the third party have to comply with all FSC requirements?**
Yes, it does. Responsibility for ensuring compliance with the FSC Principles and Criteria lies with The Organization. The Organization is responsible for decisions, policies and management activities related to the Management Unit (MU). The Organization is also responsible for demonstrating that other persons or entities that are permitted or contracted by The Organization to operate in, or for the benefit of the Management Unit, comply with the requirements of the FSC Principles and Criteria (see FSC-STD-01-001 V5-2, Preamble Chapter 5).

**b) What are the obligations of the forest owner?**
The Organization shall ensure that the intercropping is in conformity with the National Forest Stewardship Standard or Interim National Standard.

**c) Is excision mandatory if compliance with all indicators cannot be guaranteed?**
It is not mandatory to excise an area from the scope of certification where the indicators cannot be met, but it is advisable to do so for the intercropping area in order to maintain certification. In those cases, The Organization shall comply with the criteria for acceptable excision laid out in FSC-POL-20-003, Clause 2.2

**d) Are there situations in which minor deviations from the standard on a very limited portion of the MU are acceptable?**
No

| Code | INT-POL-20-003_09 |
|---|---|
| **Requirement (s)** | 3.1.d |
| **Publication date** | 07. November 2018. Updated on 03.December 2018 to align language with FSC-POL-20-003. |

**What happen when the requirements of FSC standards cannot not be met for reasons beyond the control of the managers in an area of the certificate that exceeds the 5% threshold provided in clause 3.1.d ?**

Forest areas where all FSC requirements are not met for reasons beyond the control of the forest manager shall not exceed 5% of the area of the FMU.
Factors beyond the control of the forest managers that prevent conformance with FSC requirements may have significant impact.
If an organization does not meet this threshold, the certification body shall issue a major nonconformity and the correspondent corrective action request in line with *FSC-STD-20-001 General requirements for FSC accredited certification bodies*. If the corrective action requests is not appropriately implemented within its timeframe, a major nonconformity shall lead to immediate suspension of certification.

| Code | INT-POL-20-003_01 |
|---|---|
| **Requirement (s)** | Clauses, 2.2. |
| **Publication date** | 10. April 2012. Update on 20. May 2020 to remove reference to 'very limited portion'. |

**A company has an agreement with the University to perform forestry research on specified sites of the company's FMU.**

**The company wants to excise these areas as there is a loss of control of the forest management practices that may not meet the FSC FM requirements due to the research activities.**

**During the stakeholder consultation to prepare the excision, a complaint from an indigenous community was raised: one of the research areas is part of their winter grazing areas, and research activities are likely to impact them negatively. Is it possible to excise such area if a stakeholder still disagrees?**

**If not, what could be the solution to continue meeting the FSC FM requirements and, if possible, continue also their research partnership with the University?**

No, it´s not possible to excise the area where there is a conflict. According to FSC-POL-20-003, if management of the excised area remains in the control of the owners or managers of the remaining FMU, it shall be verified that there is no violation of traditional or civil rights. In addition to this, High Conservation Values shall be maintained, what includes forest areas fundamental to meeting basic needs of local communities and/or critical to local communities' traditional cultural identity.

Areas where the University develops its research and there is no conflict with local communities can be excised as long as they comply with Policy on Excision. As for the area where there is this conflict/complaint, a solution would be to keep it within the FSC-certified area of the FMU and rescind the contract withthe University for this area. Compliance with FSC P&C shall be demonstrated.

| Code | INT-POL-20-003_07 |
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| **Requirement (s)** | Clauses 2.2.c , 2.2.e.iii |
| **Publication date** | 14. December 2015 |

**a) Does FSC require obligatory on-site evaluation of excised areas as only mean of verification to determine compliance with Principle 1 (long term commitment to the FSC Principles and Criteria)?**

**b) Should on-site visits be required, are certification bodies (CBs) obliged to perform verification as required by the Policy using relevant requirements of the standards FSC-STD-30-010 and FSC-STD-20-012.**

a) No, FSC-POL-20-003 does not require on-site evaluations of excised areas to assess compliance with Criterion 1.6. However, if the certification body (CB) considers necessary on-site evaluations to assess compliance with Criterion 1.6 or verify that controversial activities are not carried out, they may be conducted.

b) On-site visits are not required, but if the CB considers necessary to conduct on-site evaluation to verify that controversial activities are not carried out, the CB shall use relevant requirements of the standards FSC-STD-30-010 and FSC-STD-20-012.

| Code | INT-POL-20-003_03 |
| --- | --- |
| **Requirement (s)** | Clause 2.2.c |
| **Publication date** | 21. April 2015 |

**A certified forest owner wants to start a quarry in an area covered by natural forest included in the scope of their certificate. The land area for the quarry remains in the ownership of the certified landowner and there is an agreement between the landowner and the quarry company saying that the company has right to start and operate the quarry. This kind of conversion is not permitted in the national FM-standard, indicators for 6.10. Is this kind of forest conversion/excision permitted at all according FSC-POL-20-003?**

No, as the forest owner retains control of the activities on the land through the agreement, this kind of conversion is not permitted, unless the requirements in criterion 6.10 of Principles and Criteria V4-0 are met.
Note: Read also FSC-POL-20-003 Clause 2.2.c, the interpretation of this clause published on the 13th March 2014 and FSC-STD-30-010 FSC Controlled Wood Standard for forest management enterprises.

| Code | INT-POL-20-003_02 |
| --- | --- |
| **Requirement (s)** | Clause 2.2 |
| **Publication date** | 13. May 2014 |

**Shall '*controversial sources*' as referenced in *FSC-POL-20-003 The excision of areas from the scope of certification* be interpreted as unacceptable sources according to controlled wood requirements?**

Yes, the 'controversial sources' referenced in the FSC-POL-20-003 (the Policy) shall be interpreted as unacceptable sources according to controlled wood requirements.

The certification body shall verify the management of the excised area according to requirements for controlled wood categories applicable at the Forest Management Unit level. Thus, the certification body shall perform verification as required by the Policy using relevant requirements of the standards FSC-STD-30-010 and FSC-STD-20-012.

| Code | INT-POL-20-003_05 |
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| **Requirement (s)** | Clause 2.2.d) |
| **Publication date** | 05. October 2015 |

**An area of land, that falls within all the parameters set by the Excision Policy (FSC-POL-20-003) is being cleared and excised from the certified area of the forest management unit by government authorities for the purposes of building a public road. Can this timber be sold as certified?**

No, according to Clause 2.2.d, wood harvested from excised areas has to be identified and treated as 'non-FSC-certified' source.

| Code | INT-POL-20-003_12 |
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| **Requirement (s)** | FSC-POL-20-003 Clause: 2.2.e.vii |
| **Publication date** | 24.September 2019 |

**The FSC Policy on excision of areas from the scope of certification requires certification bodies (CBs) to inform FSC IC when areas have been excised from certified management units. Which is the mechanism established by FSC to report this information?**

CBs shall report this information through the certification report (see FSC-STD-20-007a Clauses 1.4 in Box 1 and FSC-STD-20-007b Clauses 1.4 in Box 1).

| Code | INT-POL-20-003_14 |
|---|---|
| **Requirement (s)** | Section 2 and 3 |
| **Publication date** | 16. December 2022 |

**Due to the ongoing military aggression against Ukraine by Russian Federation, portions of FSC certified forest areas in Ukraine are affected by factors beyond the control of the forest manager, such as contamination by mines and areas significantly degraded or destroyed.**

**Considering this situation, which clauses of FSC-POL-20-003 FSC Policy on the excision of areas from the scope of certification can be applied to enable maintaining FSC certification in management units affected by the circumstances of the aggression?**

If the area affected by the circumstances of the aggression does not exceed the thresholds established in Clause 3.1 d, The Organization can apply Clauses 2.1 and 3.1 of FSC-POL-20-003 and maintain certification without the need of excising the affected area from the scope.
If the area affected by the circumstances of the aggression exceeds the thresholds established in Clause 3.1 d, The Organization can excise the affected area from the scope of certification if The Organization can demonstrate conformity with Clauses 2.2 and 3.2 of FSC-POL-20-003. This allows The Organization to maintain certification of the remaining area.

## FSC-POL-30-001 V3-0 FSC PESTICIDES POLICY

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| **Code** | INT-POL-30-001_08 |
| **Requirement (s)** | FSC-POL-30-001 V3.0 Scope |
| **Publication date** | 24. February 2021 |

**Does the scope and application of the Pesticides Policy apply to chemical pesticide treatment of Varroa mite inside beehives, when they are located inside a Management Unit?**

Yes, chemical pesticide treatment of Varroa mite inside beehives located inside a Management Unit is in the scope of the Pesticides Policy and the treatment shall conform with the requirements of the Pesticides Policy, considering the scale, intensity and risk of the Organization and the pesticide use.

Note: National Standards may include specific requirements for the treatment of Varroa mite. If so, certificate holders shall conform with them too.

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| **Code** | INT-POL-30-001_11 |
| **Requirement (s)** | FSC-POL-30-001 V3.0 Scope |
| **Publication date** | 27. February 2023 |

**a) The FSC Pesticides Policy does not provide a definition for a vector. Can the definition of the European Food and Safety Authority (EFSA) be applied for that purpose?**

Yes, according to EFSA, a vector is a living organism, such as mosquito, tick, fly, flea, mite, or lice etc. that transmits infectious agents (for example parasites or pathogens) of a human or animal disease (adapted from vector-borne diseases | EFSA (15uropa.eu))

**b) Are the parasites and pathogens of human and animal diseases in the scope of the FSC Pesticides Policy?**

No, based on the definition of “pest” only the vectors of parasites or pathogens of human and animal disease are in the scope of the FSC Pesticides Policy. However, all the parasites and pathogens of trees and other plants are in the scope of the FSC Pesticides Policy.

**c) Does the FSC Pesticides Policy apply to chemical treatments of parasites or pathogens causing human diseases, or to chemical treatments of parasites or pathogens causing animal diseases?**

No, except when the medical or veterinary chemical is targeting a vector, such as mosquito. Most of the medical or veterinary chemicals control parasites or pathogens directly and they are not in the scope of the FSC Pesticides Policy, e.g. worming treatments of animals, or anti-malaria tablets for humans, which directly target the Plasmodium parasite, not the mosquito.

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| **Code** | INT-POL-30-001_07 |
| **Requirement (s)** | Section C Effective and validity date, Page 8 Transition process to the revised FSC Pesticides Policy |
| **Publication date** | 22. May 2019;<br>Update on 19.June 2019 to add note under FSC highly restricted HHP and FSC restricted HHPs, scenario 2.<br>Update on 03. April 2020 to clarify the role of draft HHP-IGI in the transition period within Scenario 2;<br>Update on 20. May 2020 to update the link to the previous list of highly hazardous pesticides.<br>Update on 25. June 2020 to extend transition period due to the pandemic of novel coronavirus COVID-19 and to provide additional clarification on the role of the draft HHP-IGI.<br>Update on 04. May 2023 to reflect publication of HHP IGI and remove outdated information. |

**An interim mechanism for the implementation of the FSC Pesticides Policy became effective on 1st August 2019 and it will be gradually phased out, country by country, once the international generic indicators (IGIs) for the use and risk management of Highly Hazardous Pesticides (HHP) are incorporated into the respective Forest Stewardship Standards.**
**Which are the requirements for certificate holders for using chemical pesticides during this interim period?**

On 1st August 2019 the revised FSC Pesticides Policy V3-0 became effective and FSC-PRO-30-001 *Pesticides Derogation Procedure* was phased out.

From this date, FSC has no longer accepted new derogation applications. However, derogations issued remain valid until their expiry date, except for the prohibited pesticides. The last derogations will expire by September 2024.

Certificate holders (CHs), which do not have a valid derogation shall conform with the following requirements when using (or intending to use) chemical pesticides during the interim period:

| Type of chemical pesticide | Requirements for use according to FSC Pesticides Policy |
|---|---|
| **FSC prohibited HHPs** | Prohibited pesticides can only be used in emergency situations, or by government order.<br>In such case, the CH shall:<br>• conform with FSC-STD-30-001 Pesticides Policy V3-0 Annex 3 ‘Procedure for the exceptional use of FSC prohibited HHPs’ including conformance with the International Generic Indicators (IGI) for the use and risk management of HHPs applicable to the hazard(s) that the FSC prohibited HHP presents (see FSC-STD-60-004 V2-1).<br>• Incorporate to the ESRA the requirements from the most recent published version of the HHP IGI. |
| **FSC highly restricted HHP and FSC restricted HHPs** | **Scenario 1. The CH has an approved derogation:**<br><br>Existing approved derogations and their conditions will remain valid until the expiry date of the derogation.<br><br>Until that date, the CH may continue using the FSC highly restricted HHP and FSC restricted HHPs, provided that the derogation conditions are fulfiled. |

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| | After the expiry date of the derogation, the CH shall conform with Scenario 2 below. |
| | **Scenario 2. The CH has no approved derogation:**<br><br>Before using a FSC highly restricted HHP or FSC restricted HHPs, the CH shall:<br><br>• conduct an environmental and social risk assessment (ESRA) conforming with the requirememts of the ESRA framework for Organizations (FSC-STD-30-001 Pesticides Policy V3-0, clause 4.12).<br>• incorporate to their ESRA the conditions from the most recent derogation approved in the country for that chemical pesticide (if there is one), and<br>• incorporate to the ESRA, the requirements from the most recent published version of the IGI (see FSC-STD-60-004 V2-1 Criterion 10.7 and Annex J).<br><br>NOTE: In this context, 'incorporate' means that the CH shall review the most recent version of the IGIs for the use of HHPs published by FSC International to identify aspects applicable to the HHP they intend to use, and, if relevant, bring these aspects into their ESRA.<br><br>It is not mandatory for the CH to conform with these indicators or the associated instructions for standard developers. However, the CH is required to review the IGIs and use them as guidance for their ESRA.<br><br>For example, in some contexts the CH may find that the draft IGIs on monitoring provide useful guidance on how they could approach monitoring of exposure and any human health impacts, but in other contexts, particularly where there are already robust systems in place to mitigate risks of pesticide use, the CH may be able to identify equally or more effective approaches to monitoring. |
| **Other chemical pesticides (non – HHP)** | Before using other chemical pesticides, the CH shall conduct an environmental and social risk assessment (ESRA) and conform with the applicable requirements of the ESRA framework for Organizations (FSC-STD-30-001 Pesticides Policy V3-0, clause 4.12). |

| Code | INT-POL-30-001_09 |
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| **Requirement (s)** | FSC-POL-30-001 V3-0 Transition process to revised FSC Pesticides Policy<br>INT-POL-30-001_07 |
| **Publication date** | 24. February 2021 |

**Some certificate holders (CHs) wish to conduct Environmental and Social Risk Assessments (ESRAs) for FSC highly restricted highly hazardous pesticides (HHPs) and FSC restricted HHPs for which derogation applications have previously been rejected in that country.**

**INT-POL-30-001_07 clarifies that for FSC highly restricted HHP and FSC restricted HHPs CHs shall "incorporate to their ESRA the conditions from the most recent derogation approved in the country for that chemical pesticide, if there is one".**

**INT-POL-30-001_07 does not specify that CHs shall incorporate to their ESRAs information from derogation processes where a derogation application for the pesticide in question has previously been rejected.**

a) **When conducting ESRA for FSC highly restricted HHPs and FSC restricted HHPs, for which derogation applications have previously been rejected in that country, shall the information from the previous derogation process be considered in the ESRA?**

Yes, the information from the previous derogation rejections shall be considered in the ESRA by the certificate holders whose derogation request was rejected. The reasons for rejecting the application shall be addressed in the ESRA process.

b) **If so, where can certificate holders and certification bodies access this information?**

FSC International communicated the rejection decisions to the applicants through their certification bodies, together with the reasons for a rejection.

| Code | INT-POL-30-001_12 |
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| Requirement (s) | Sections 4.7; 4.11; and 4.12, Table 2 and Clauses 4.12.2; 4.12.6; 4.12.7 and 4.12.10<br>INT-POL-30-001_07, Scenario 2<br>FSC-STD-60-004 V2-1 Indicator 10.7.3 |
| Publication date | 19. September 2023 |

**a) General principles in Section 4.7 provide requirements for the use of chemical pesticides, which are not included in the FSC lists of Highly Hazardous Pesticides (HHPs).**
**That section states that The Organization shall undertake environmental and social risk assessment (ESRA) as per Clauses 4.12.2 and 4.12.6, which provide specifications for a comparative ESRA and actions to be taken. Does that imply that only Clauses 4.12.2 and 4.12.6 are applicable in respect to Section 4.12. ESRA Framework: role of Organizations in <FSC-POL-30-001 V3-0 FSC Pesticides Policy> in undertaking the ESRA?**

**b) In situations where the FSC Pesticides Policy is not yet addressed in the applicable Forest Stewardship Standard (FSS), can the indicator 10.7.3 of <FSC-STD-60-004 V2-1 International Generic Indicators> specifying the engagement requirements for ESRA, be used by the auditors for assessing the conformity with engagement requirements laid out in Clause 4.12.10 of the Pesticides Policy for conducting ESRA?**

**c) Is it sufficient for The Organization to share the ESRA documentation with the stakeholders adjacent and inside the management unit (MU) to conform with the engagement requirements in Clause 4.12.10 of the FSC Pesticides Policy?**

**d) Is a notification of stakeholders within and adjacent to the management unit prior to the spraying of HHPs, or prior to the spraying of such chemical pesticides, which are not considered highly hazardous by FSC, enough for conforming with the 'stakeholder engagement' requirements described under the Clause 4.12.10 of FSC Pesticides Policy?**

**e) If ESRAs have been developed within a country by the Standard Development Group using a wide stakeholder consultation process, and for example including industrial bodies and FSC national office, does this imply that Clause 4.12.10 of FSC Pesticides Policy is already complied with when the ESRAs are distributed to The Organization?**

**f) Can The Organization use an already verified ESRA developed by another Organization to conform with the engagement requirements laid out in clause 4.12.10 of the FSC Pesticides Policy?**

**g) If a fully developed and approved ESRA states that there is no risk to neighbouring properties because of the active ingredients involved and application methods, does this imply that Clause 4.12.10 of the Pesticides Policy is not applicable?**

a) Yes, only these two clauses 4.12.2 and 4.12.6 are applicable for undertaking ESRA in respect to Section 4.12 when using chemical pesticides not considered highly hazardous by FSC.
However, if there are third-party processing plants located in the spatial area of the management unit (MU), or if The Organization is sourcing seedlings from a third-party nursery supplier, then also Clauses 4.12.12 and 4.12.13 apply and The Organization shall inform them about prohibited pesticides as per Clause 4.12.12 and request list of the prohibited pesticides used as per Clause 4.12.13.

b) Yes, in these situations the indicator 10.7.3 can support the auditors for assessing the conformity with clause 4.12.10. It is not mandatory for the certificate holder (CH) to conform with the indicator or the associated instructions for standard developers. However, the CH is required to review the IGIs and use them as guidance for their ESRA, as indicated in Scenario 2 of INT-POL-30-001_07.

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| Auditors have to incorporate highly hazardous pesticides use to the overall evaluation of the engagement requirements laid out under Principles 3, 4 and 7 of the applicable FSS.<br>NOTE: 'Conducting ESRA" means that The Organization develops the ESRA in conformity with the clauses 4.12.2, 4.12.3, 4.12.4, 4.12.5, 4.12.8 and 4.12.10 of the <FSC-POL-30-001 V3-0 FSC Pesticides Policy>.<br>c) No, sharing the ESRA documents is not sufficient to meet the definition of engagement in the Clause 4.12.10 of <FSC-POL-30-001 V3-0 FSC Pesticides Policy>.<br>d) No, a notification of stakeholders within and adjacent to the management unit prior to the spraying of HHPs is not enough for 'stakeholder engagement'. Also, the engagement requirements in the applicable FSS under Principles 3, 4 and 7, the definition of engagement in the applicable FSS, and the clause 4.12.10 of <FSC-POL-30-001 V3-0 FSC Pesticides Policy> shall be conformed with.<br>NOTE: Clause 4.12.10 of <FSC-POL-30-001 V3-0 FSC Pesticides Policy> is not applicable to such chemical pesticides, which are not considered highly hazardous by FSC, as indicated in the answer to question a).<br>e) No, The Organization shall still demonstrate conformity with Clause 4.12.10 of <FSC-POL-30-001 V3-0 FSC Pesticides Policy><br>NOTE: The Organization may use elements of the ESRA conducted by Standard Development Group, or by the Network Partner, to demonstrate conformity with Clause 4.12.10, provided that the information is relevant at the Management Unit level.<br>f) No, the ESRA may be transferable between certificate holders at national level as indicated in Table 2. ESRA framework in <FSC-POL-30-001 V3-0 FSC Pesticides Policy>, provided that the certificate holders operate under similar conditions using the same target HHP. However, this does not satisfy engagement requirements as per 4.12.10, which has to be still conducted.<br>g) No, the engagement requirements in Clause 4.12.10 and the engagement requirements in the applicable FSS under Principles 3, 4 and 7, remain applicable even if a fully developed and approved ESRA states that there is no risk to neighboring properties. |

| **Code** | INT-POL-30-001_13 |
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| **Requirement (s)** | Clauses 4.12, 4.13 and Annex 4 Clause 1 and 2 |
| **Publication date** | 14. July 2025 |

**Where the need arises to use a highly hazardous pesticide (HHP) that the Standard Development Group (SDG) has not been considered or allowed for use in the country as per Annex 4 Clauses 1 and 2 of <FSC-POL-30-001 V3-0 EN Pesticides Policy>, is the use of such HHP permissible?**

No. The use of an HHP that the SDG has not considered or allowed for use in the country is not permissible, except under the conditions specified below.

1. For HHPs that the SDG has not considered for use (see: Annex 4, Clause 1 of <FSC-POL-30-001 V3-0 EN Pesticides Policy>) The Organization shall:

   a) Conduct an Environmental and Social Risk Assessment (ESRA) conforming with the requirements of the ESRA framework for The Organization provided in FSC-STD-30-001 FSC Pesticides Policy, sections 4.12 and 4.13;
   b) Conform with the indicators in Annex J in the applicable Forest Stewardship Standard (FSS); or with the International Generic Indicators in Annex J of <FSC-STD-60-004 International Generic Indicators> for those Indicators in the FSS that have been adapted in a way where they are not applicable to the target HHP.
   c) Notify the local FSC Network Partner once the use of the HHP commences; and
   d) Align the application of the HHP with any future decisions made by the SDG on the
   e) usage of the HHPs

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| 2. For HHPs that the SDG has determined are not allowed for use in the country (see Annex 4, Clause 2 of <FSC-POL-30-001 V3-0 EN Pesticides Policy>), the use of such HHPs is only permitted, when the conditions have substantially changed from the time the HHP was assessed by the SDG. Substantially changed conditions can be:<br><br>a) Emergency situations as defined in the <FSC-POL-30-001 V3-0 EN Pesticides Policy>, or<br>b) Governmental order(s) regarding the permissions for the use of HHPs in the country have changed.<br><br>In both cases 2a) and 2b), The Organization shall conform with the requirements 1a),1b),1c) and 1d) above |

| **Code** | INT-POL-30-001_10 |
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| **Requirement (s)** | Clauses 4.12.12 and 4.12.13 |
| **Publication date** | 24. June 2021 |
| **The FSC Pesticides Policy requests to inform third-party processing plants located in the spatial area of the management unit and third-party nursery suppliers of the list of FSC prohibited chemical pesticides, encouraging them to avoid these pesticides in their processes and in the production of seedlings and other materials entering the management unit, and request that they submit the list of FSC prohibited chemical pesticides used.**<br>**If the third-party processing plants or the third-party nursery suppliers does not submit the list of prohibited pesticides used, does it constitute a non-conformity of the certificate holder with the policy requirements?**<br><br>No. It does not constitute a breach of the policy if the nursery or processing plant does not respond to these requests. | |

## FSC-POL-30-401 (2002) FSC CERTIFICATION AND THE ILO CONVENTIONS

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| **Code** | INT-POL-30-401_01 |
| **Requirement (s)** | Section 2 |
| **Publication date** | 11. March 2015 |

**Is it mandatory for all forest managers to comply with the eight core (fundamental) ILO conventions and with all the ILO conventions that have an impact on forestry operations and practices (as listed in FSC-POL-30-401:2002) when the Policy reads that 'FSC expects forest managers to comply'?**

Yes, it is mandatory for all forest managers to comply with the eight core (fundamental) ILO conventions and with all the ILO conventions that have an impact on forestry operations and practices (as listed in FSC-POL-30-401:2002).

Rationale:

FSC-STD-20-001 V3-0 GENERAL REQUIREMENTS FOR FSC ACCREDITED CERTIFICATION BODIES: THE APPLICATION OF ISO/IEC GUIDE 65:1996, Clause 4.1
4.1 FSC specification to ISO/IEC Guide 65: 1996 (E) Clause 4.3
In carrying out certification within the scope of its FSC accreditation the certification body shall comply with the requirements of all applicable FSC policies, standards, directives, guidance documents and advice notes as published on the FSC International Center website (www.fsc.org).

FSC-STD-20-002 (V3-0) STRUCTURE, CONTENT AND LOCAL ADAPTATION OF GENERIC FOREST STEWARDSHIP STANDARDS, Clause 9.3
9.3 The locally adapted standard shall comply with all applicable approved FSC international policies, standards, directives, guidelines and advice notes.

FSC-STD-60-002 (V1-0) STRUCTURE AND CONTENT OF NATIONAL FOREST STEWARDSHIP STANDARDS, Clause 3.5 b)
3.5 The standard shall include as annexes:
b) a list of the multilateral environmental agreements and conventions that the country has ratified and the ILO Conventions listed in FSC-POL-30-401 FSC and the ILO Conventions which must be complied within all FSC certified forests.

# STANDARDS

## FSC-STD-01-001 (V4-0) FSC PRINCIPLES AND CRITERIA FOR FOREST STEWARDSHIP

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| **Code** | INT-STD-01-001_06 (also published under FSC-DIR-20-007 with code INT-DIR-20-007_05) |
| **Requirement (s)** | Criteria 1.6, 2.1 |
| **Publication date** | 26. August 2013 |

**We have two clients, which are certified under single certificates.**
**These two companies are owners of a part of their lands and concessionaires of the second part, comprised of small owners' concessions.**
**The small owners have contractually given full operational, administrative and responsibilities to these companies to manage the forest for 30 years, there is no ambiguity about the concession status of their lands.**
**Now these two companies want to enter into an FSC certification group that will be managed by a third company (Type I group, shared responsibilities). This third company is the mother company of these 2 forest companies.**
**We think that they can be considered as classical group members managing their own lands and concessions.**

**Shall each small owner be considered/become a group member?**

No, owners don´t have to become group members, as long as the manager has explicit authorization from the owner to manage the forest in compliance with the FSC P&C.

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| **Code** | INT-STD-01-001_05 |
| **Requirement (s)** | Principle 9: Maintenance of High Conservation Value Forests; Criterion 1.6 |
| **Publication date** | 08. May 2013 |

**Should the precautionary approach be applied to a decision concerning the sale of HCVF forest land which falls within the scope of an FSC FM/COC certificate to a different non-FSC certified legal entity?**

FSC does not intend to regulate the sale of land containing HCVs by certified organizations or applicants, but it is expected that the organization will make every reasonable effort to safeguard the values and/or the area containing the values, including making the buyer aware of the values and measures to protect them.

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| **Code** | INT-STD-01-001_02 |
| **Requirement (s)** | Criteria 1.6, 2.1. |
| **Publication date** | 31. January 2012 |

**Under what circumstances can Canadian Non Renewable Forest License (with a 5 year term) be certified?**

According to FSC Principles and Criteria, a 5 year license wouldn´t be an impediment itself to achieve a Forest Management certificate. Nevertheless, long-term commitment to adhere to the FSC P&C in the Management Unit has to be guaranteed, together with clear evidence of long-term forest use rights to the land.

A statement of this long-term commitment shall be contained in a publicly available document made freely available. This document will also contain the commitments listed for the self-declaration statement required by FSC-POL-01-004 Policy for the Association of Organizations with FSC, for non-involvement in unacceptable activities.

The key factor is whether there is convincing evidence of management for the long-term stewardship of the forest. In evaluating long-term commitment to the FSC Principles and Criteria, FSC is looking for evidence of resources invested in long term management - for example in research, inventory, management planning, roading, controlled harvesting, post-harvest inventory and forest protection.

In evaluating long-term forest use rights to the land, FSC is looking for clear long-term use rights of the owner. These may be partially delegated to a responsible authority, such as a concessionaire, for a shorter or longer period. FSC is then looking for clear evidence of this delegation of authority, together with the owner's commitment that the delegated authority has the right to manage the land in compliance with the FSC P&C.

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| **Code** | INT-STD-01-001_01 |
| **Requirement (s)** | Criterion 2.1 |
| **Publication date** | 04. July 2008 |

**Can land possession rights be considered as sufficient evidence to demonstrate long-term forest use rights to the land in the context of Brazil?**

Land possession rights can be considered as sufficient evidence to demonstrate long-term forest use rights to the land in the context of Brazil, provided that:

- the certificate holder (or applicant) can demonstrate to be in the process of obtaining formally registered land titles;
- the certificate holder can demonstrate the progress in obtaining formally registered land titles in each surveillance audit;
- there are no unresolved disputes of substantial magnitude over land tenure or use under possession rights (see Criterion 2.3);
- the land possession rights shall be transferred to formally registered land titles within a period of max. 5 years of including the land into the certificate.

| Code | INT-STD-01-001_04 |
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| **Requirement (s)** | Criterion 5.6. |
| **Publication date** | 07. September 2012 |

**How is "permanently sustained" interpreted for Criterion 5.6 in relation to calculated AAC? Based on experience working with a number of approved FSC national FM standards, it is our understanding that "permanently sustained" does not preclude harvesting levels that in any one year or perhaps even multiple years exceed what would be classified as maximum average AAC.**

**Or in other words it is possible to be in conformance with Criterion 5.6 when short term annual harvest volumes exceed calculated AAC if it can be justified based on long term management objectives (e.g. shifting age class distribution to a normalized state)?**

Yes, it is possible, if the AAC that has been calculated based on recognized methods for a period of years, usually ten years, is complied with. Or if in case of unforeseen circumstances, e.g. calamities or storms, the AAC is adjusted.

| Code | INT-STD-01-001_09 (See also INT-STD-20-007_45) |
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| **Requirement (s)** | Criterion 6.4 (in P&C V4), Criterion 6.5 (in P&C V5) |
| **Publication date** | 03. June 2015;<br>amended on 14. March 2016; update on 14. July 2017 to add clarification note; update on 24. January 2018 to modify wording in question a), replacing 'Management Unit' by 'the group' to clarify the original intent of the interpretation; Update on 23. July 2020 to add the question and answer on forest landscape and to remove the reference to P&C V4. |

**a) Can a SLIMF owner or group scheme meet set-aside requirements outside the group?**
**b) If so, does a SLIMF owner or group scheme providing financial and other assistance to existing conservation areas within the forest landscape, constitute compliance with criterion 6.4?**
**C) How is the forest landscape defined?**

a) Yes, if there are insufficient or no representative samples areas within the Management Unit (MU), and under the following conditions:
• The MU is smaller than 50 ha;
• The Organization shall identify rare and threatened species and their habitats in the MU. When they exist although are insufficient in size, measures for their survival and viability shall be identified and put in place.
• The outside area is in the same forest landscape. • Sites to be conserved outside of the MU are representative samples of existing ecosystems.
• The outside area is not commercially harvested and is under a legal protection status, OR there is a binding contract between the Organization and the owner of the outside area to:
o Protect the area in its natural stage;
o Mark the boundaries of the area in the field and on maps;
o Allow certification bodies to access area for inspection.

b) Financial assistance alone does not constitute compliance with the requirements of criterion 6.5. Some conservation efforts have to be demonstrated within the MU. Other examples of conservation efforts may be presented to PSU for evaluation on a case by case basis.

c) For the purpose of this interpretation, the forest landscape is defined as the quaternary water catchment area. If defining the boundaries of a quaternary water catchment area is not feasible, other delineations for defining the forest landscape may be used, based on vegetation zones or other biophysical characteristics reflecting the natural conditions in the country.

**Note:** This interpretation does not eliminate the option for SLIMF owners to meet the requirement of min. 10% Conservation Area Network at the level of the group entity within a group certification (see: FSC-STD-20-007, clause 5.3.6).

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| **Code** | INT-STD-01-001_12 |
| **Requirement (s)** | Criterion 6.4 (in P&C V4), Criterion 6.5 (in P&C V5) |
| **Publication date** | 22. August 2016 |

**In relation to the term "protected", please clarify:**
**a) How long-term are set-aside areas intended to be? Is a shift to new areas in short term appropriate and justifiable?**
**b) Can protection also include areas which are managed? If this is the case, to what extend is this acceptable?**

a) The duration of "long-term" shall be related to the length of management plans defined by the national legislation of each country (usually 10-20 years, but not less than 10 years). A shift to new areas is acceptable only if it is justified to the CBs and shall be approved by them.
b) The protected areas can be managed only in relation to conservation objectives or health and safety measures due to regulatory obligations. The areas shall not be managed for commercial purposes.

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| **Code** | INT-STD-01-001_10 |
| **Requirement (s)** | Criterion 6.10 |
| **Publication date** | 05. October 2015 |

**An applicant for FM certification manages HCV 2 forests in Germany and operates sand mining areas. During the operation, standing stock is removed, sand is mined and after 5-10 years all forests are reforested with a higher ecological value.**

**a) What is the definition of conversion?**
**b) Is temporary conversion accepted??**
**c) Under which circumstances can a temporary conversion in HCVF be acceptable if the temporary change of land use is considered conversion in the context of FSC?**

a) There is a definition for conversion in FSC-POL-01-004 (Policy for the association of organizations with FSC) and several references to this term in FSC normative documents. Currently the working group addressing Motion 12 (GA 2014) is working on a system-wide definition for conversion.
b) Conversion is only accepted if it complies with the criterion 6.10 (P&C V4) regardless of

its temporality.
c) In Germany, according to an interpretation of the German NFSS approved by PSU, limited and beneficial conversion in areas containing HCV´s is possible if:
• The value is maintained or enhanced (this needs to be demonstrated through impact assessment) and
• Only a very limited portion of the area of the HCV is affected and
• Conversion produce benefits for the FMU (This needs to be agreed in a process by the stakeholders as to what constitute beneficial values).
This interpretation only applies within the scope of the German NFSS, with which this interpretation is associated.

| **Code** | INT-STD-01-001_07 |
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| **Requirement (s)** | Criterion 6.10 |
| **Publication date** | 11. September 2013 |

**If conversion in circumstances other than compliance with FSC Criterion 6.10 cannot take place within an FSC-certified area, is the conversion of plantations to natural forest not permitted?**

Criterion 6.10 refers to 'Forest conversion to plantations or non-forest land uses'. The formation of more natural conditions is not covered by this criterion.

There are no requirements for the formation of more natural conditions (e.g. from plantations to natural forest). This is OK as long as HCVs are maintained and not threatened.

Please, check the definition of 'conversion' in the Policy for Association (FSC-POL-01-004 V2-0).

| **Code** | INT-STD-01-001_03 |
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| **Requirement (s)** | Criteria 10.8, 6.9. |
| **Publication date** | 03. February 2012 |

**Can a certificate holder continue to plant invasive species, such as black wattle (a highly invasive species) on a large scale in plantations established in 1930's?**

No, these plantations are not allowed unless invasive impacts can be controlled and effective mitigation measures are in place.

| Code | INT-STD-01-001_08 |
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| **Requirement (s)** | Criterion 10.9 |
| **Publication date** | 11. September 2013 |

**Can areas converted from natural forests after 1994 become certified if the forest manager is actively restoring these sites toward natural conditions? Would it be possible to invoke FSC-ADV-31-001?**

In general no, but there are 2 exceptional cases where certification in these areas may be allowed:

- Plantations established in areas converted from natural forest after November 1994 where sufficient evidence is submitted to the certification body that the manager/owner is not responsible directly or indirectly of such conversion (Criterion 10.9)
- If a restoration option has been approved and included in the National Standard.

Invoking FSC-ADV-31-001 is not possible. The Motion 18 from the GA 2011 requires the FSC to complete the Plantations Review.

## FSC-STD-01-001 (V5-2) FSC PRINCIPLES AND CRITERIA FOR FOREST STEWARDSHIP

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| **Code** | INT-STD-01-001_15 |
| **Requirement (s)** | Criteria 1.2 and 1.8 |
| **Publication date** | 02. August 2018 |

**A potential certificate holder (CH) includes several management units (MUs) owned by different smallholders that don't have any responsibility on the forest management, as they have a long term agreement with a manager responsible for this.**
**The owners don't want to be included as group members in the certificate as adds administrative cost for them while they don't have any responsibility.**
**Based on interpretation INT-STD-01-001_06, if the smallholders can skip being group members, could this be a multiple MU?**

As per INT-STD-01-001_06, the smallholders are not required to become group members, as long as the manager has explicit authorization from them to manage the forest in conformance with the FSC Principles and Criteria and all other applicable FSC requirements. In this case, multiple FM certification would applied.
Note. In the absence of such authorization, the FSC Standard for group entities in forest management groups (FSC-STD-30-005) would apply.

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| **Code** | INT-STD-01-001_11 |
| **Requirement (s)** | Criterion 2.4 (in P&C V5) |
| **Publication date** | 11. May 2016 |

**Please give guidance regarding the applicability (to whom it applies) and the ways to proceed on different possible scenarios regarding Criterion 2.4 on FSC P&Cv5.**

<u>1. Applicability</u>
• Applies to employees of The Organisation? Yes
• Applies to contractors working for The Organization? Yes.
• Applies to workers who are employed by harvesting company when timber is sold standing? Yes.
• Applies to community forests where community itself does work for less than minimum wage? Yes, this applies to the community forests as well. However, if workers are members of the community which manages the forest, they may agree on different wage levels as per FSC-STD-60-004 Clause 2.4.3.
• This Criterion does <u>not apply</u> for persons that are owners or part owners, or belong to the group of owners of the Management Unit. Examples could be family members in the case of small scale family owned Management Units or community members whose income in part or in total depends on the profits generated from the Management Unit.

NOTE:
Workers are defined in the P&C as: All employed persons including public employees as well as 'self-employed' persons. This includes part-time and seasonal employees, of all ranks and categories, including laborers, administrators, supervisors, executives, contractor employees as well as self-employed contractors and sub-contractors (Source: ILO Convention C155 Occupational Safety and Health Convention, 1981).

<u>2. Scenarios</u>
• As a minimum, the legal minimum wages need to be paid.

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| • If other types of wages (minimum forest industry standards, other recognized forest industry wage agreements, OR living wages) exist AND they are higher than the legal minimum, that higher wage type needs to be paid.<br>• If the legal minimum is higher than any of the other types of wages, the legal minimum wages need to be paid.<br>• Where no legal minimum wages exist, but industry minimum standards OR wage agreements OR living wages, the highest of these must be paid.<br>• Where none of these types of wages already exists, The Organization is required to establish the level of living wages through engagement with workers and pay these. |

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| **Code** | INT-STD-01-001_13 |
| **Requirement (s)** | Clause D.3 |
| **Publication date** | 30. January 2017 |
| **Can the Certification Bodies exclude non-productive forest (i.e. low productive forest, peatlands, rock outcrops, etc) from registering in the data base despite they are part of a Management Unit submitted for certification?**<br><br>No, Certification Bodies can not exclude non- productive forest from registering in the database as all land cover types within the scope of the certificate shall count towards the 'ha' to be entered in the database. As stipulated in the preamble of P&C V5: "In terms of geographical space, the FSC Principles and Criteria apply generally to the entire geographic space inside the boundary of the Management Unit which is being submitted for (re)certification.'' | |

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| **Code** | INT-STD-01-001_16 |
| **Requirement (s)** | FSC-STD-01-001 V5-2 Section D Preamble, Paragraph 3 Scope<br>ADVICE-20-007-01 Clause 7 |
| **Publication date** | 17. December 2019 |
| **FSC-STD-01-001 V5-2 requires that in order to certify 'other vegetation types', a case by case judgement needs to be taken.**<br>**a) To which vegetation types does this requirement apply?**<br>**b) Who is supposed to take this case by case judgement?**<br><br>Re a: This requirement applies to silvo-pastoral production systems, agroforestry, medium to long rotation coppice systems, oil palm plantations, as well as to cacao, coffee, tea and olives (this list is not fully inclusive).<br><br>Re b: Vegetation types as listed under item a) shall only be included in the scope of certification after prior formal approval by FSC International. | |

| Code | INT-STD-01-001_14 |
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| **Requirement (s)** | F Glossary of Terms. Definition of Management Unit |
| **Publication date** | 24. January 2018 |

**Regarding the eligibility for multiple FMU certification, we understand that the holding company can either have ownership or management control.**
**With regards to management control, is it required to have a full management control or a partial management control with ability to influence decision making of the respective Management Units through a contractual relationship or a seat at the board?**

The holding company (certificate holder) shall have full management control of the MUs to guarantee that decisions that lead the holding company to comply with the requirements of FSC certification are taken.

| Code | INT-STD-01-001_17 |
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| **Requirement (s)** | FSC-STD-01-001 V5 Criterion 1.8<br>FSC-STD-01-001 V4 Criterion 1.6<br>FSC-POL-01-004 Policy for the Association of Organizations with FSC<br>FSC-POL-20-002 FSC Policy on Partial Certification of Large Ownerships |
| **Publication date** | 28.October 2020 |

**a) Is a certification body (CB) expected to evaluate conformance with the Policy for Association (PfA)?**

No, CBs are not required to evaluate conformance with the PfA, neither within nor outside of the MU. This is done by FSC International.
However, unacceptable activities are also reflected in the FSC Principles and Criteria and are evaluated by CBs through the national standards.
Indicators in national standards referring to the PfA – or to conflicts with the Principles and Criteria on areas outside the MU – such as indicator 1.6.2 in FSC-STD-IDN-01-01-2013 for Indonesia, are not applicable for conformity assessments by CBs.

**b) Does a CB have to evaluate the FSC Policy on Partial Certification of Large Ownerships or relevant references to it in national standards?**

No. FSC is not requiring CBs to evaluate conformance with the Policy on Partial Certification of Large Ownerships. Conceptually this policy has been replaced by the PfA. Relevant references in national standards, such as indicator 1.6.3 in FSC-STD-IDN-01-01-2013 for Indonesia, are not applicable for conformity assessments by CBs.

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| **Code** | INT-STD-01-001_18 |
| **Requirement (s)** | FSC-STD-01-001 V5-2. Criterion 10.8<br>FSC-POL-30-001 V3.0. FSC Pesticides Policy. A Objective |
| **Publication date** | 24. February 2021 |

**Is the use of biological control agents expected to be minimized even when they are replacing chemical pesticides?**

No. Biological control agents shall be prioritized over chemical pesticides. The overall use of biological control agents may increase when they replace the use of chemical pesticides. When biological control agents are used, the doses shall be managed according to the Integrated Pest Management plan to reduce the economic costs and the potential negative impacts to the environment and human health.

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| **Code** | INT-STD-01-001_19 |
| **Requirement (s)** | FSC-STD-01-001 V5-3 EN FSC Principles and Criteria for Forest Stewardship / Criterion 10.4. and Section F. Glossary, 'Genetically Modified Organism'<br><br>FSC-STD-01-001 V4-0 EN FSC Principles and Criteria for Forest Stewardship / Criterion 6.8 and Glossary<br><br>FSC-POL-30-602 V1-0 EN Interpretation on GMO (Genetically Modified Organisms) |
| **Publication date** | 17. July 2026 |

**Are trees whose genome has been edited using CRISPR-based technologies falling under the FSC definition of 'Genetically Modified Organism"?**

Yes, the definition of Genetically Modified Organism covers also organisms in which the genetic material has been altered using modern, CRISPR-based gene editing technologies. The definition's element of "altered in a way that does not occur naturally" is understood to refer both to the resulting genome change as well as to the process to induce it, hence any genetic engineering technology falls within the scope of the GMO definition.

## FSC-STD-01-001 (V5-3) FSC PRINCIPLES AND CRITERIA FOR FOREST STEWARDSHIP

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| **Code** | INT-STD-01-001_18 (also published under FSC-STD-20-001 with code INT-STD-20-001_50, and FSC-STD-UKR-01.1-2024 with code INT-STD-UKR-01.1-2024_01) |
| **Requirement (s)** | FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship, Preamble, Section 5<br>FSC-STD-20-001 V4-0 General requirements for FSC accredited certification bodies Clauses 1.2.3. l); 1.4.6; 4.8.3<br>FSC-STD-UKR-01.1-2024 V 1-1 The FSC Forest Stewardship Standard for Ukraine, indicators 1.1.1 and 1.1.2 |
| **Publication date** | 29. January 2025 |

**a) Can a CB grant forest management certification to a single Forestry Unit belonging to a branch “XXXXXXX Forest Office” of the State Specialized Forest Enterprise (SFE)?**

Yes, a CB can grant certification to a single Forestry Unit belonging to a branch “XXXXXXX Forest Office” of the State Specialized Forest Enterprise (SFE), provided that the Forestry Unit:

3. Conforms with the FSC definition of The Organization and can take responsibility for decisions, policies and management activities related to the Management Unit as required by the Preamble, Section 5 in <FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship>,
4. Has organized the forest areas aimed to be certified as a single or multiple Management Units (MU) according to the FSC definition of a MU (see Glossary of Terms in <FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship>, and
5. Demonstrates conformity with the FSC-STD-UKR-01.1-2024 V 1-1 The FSC Forest Stewardship Standard for Ukraine.

No later than by the next scheduled evaluation, the CB shall evaluate the consequences of the change of scope of the certification and reflect the new name and structure of The Organization as specified in Clauses 1.2.3. l); 1.4.6 and 4.8.3 of <FSC-STD-20-001 V4-0 General requirements for FSC accredited certification bodies>.

NOTE 1: During the time period when the CB is evaluating the changes and circumstances affecting certification, and no later than by the next scheduled evaluation, the existing certification granted to the branches of SFE "Forests of Ukraine" remains valid.
NOTE 2: The legal registration of the SFE “Forests of Ukraine” extends to the units it has established, including Forestry Units.

**b) Are CBs in Ukraine expected to require their clients “SFE Forests of Ukraine, branch XXXXXXX Forest Office, Forestry Unit XXXXXXX” to sign the most recent version of the ‘License Agreement for the FSC Certification Scheme’, in response to the reorganisation and changes in the structure of the SFE "Forests of Ukraine"?**

Yes, in response to the changes in the structure and legal ownership of the State Specialized Forest Enterprise "Forests of Ukraine", the CB shall require The Organization within a period of two (2) months to enter into and hold the most recent version of the ‘License Agreement for the FSC Certification Scheme’, as well as ensure that the signed agreements uniformly identify the contracting party according to the following example: “SFE Forests of Ukraine, branch XXXXXXX Forest Office, Forestry Unit XXXXXXX” .

## FSC-STD-01-003 (V1-0) SLIMF ELEGIBILITY CRITERIA

| **Code** | INT-STD-01-003_01 |
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| **Requirement (s)** | Clause 2.1 |
| **Publication date** | 04. July 2008 |

**What is the "area" referred to in this clause?**

The area of a small forest shall be defined in relation to the production forest area. This means that permanent protection areas and areas with other uses within the forest management unit that are clearly indicated in the Management Plan and on the ground will not be considered when calculating the size of the unit that is applying to be classified as a SLIMF.

| **Code** | INT-STD-01-003_05 |
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| **Requirement (s)** | FSC-STD-01-003 Clause 2.1<br>FSC-STD-01-001 Management Unit' definition |
| **Publication date** | 24. September 2019 |

**We are facing a situation where we are asked to quote for a group scheme and where they want the entire group to be considered as SLIMF. Some of the members however own more than one property and whereas each individual property is below 100 ha, the total area of all properties owned by such a member would exceed the 100ha limit. Would it be possible to enter each property individually into the scheme, which means we will have a member in the scheme with more than one property, but it will remain SLIMF since each individual property does not exceed the SLIMF limit?**

Yes, if each 'property' qualifies as a 'Management Unit' (MU) according to FSC's definition and does not exceed the SLIMF limit.

FSC certification does not operate on the concept of 'properties', but on 'Management Units'. If in the above example all properties are equal to MUs, then all MUs below 100ha qualify as SLIMF, even if owned by one person or company. If properties in the above example are just sub-units of a MU, this is not possible. The MU as per FSC definition is what counts.

| **Code** | INT-STD-01-003 _03 |
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| **Requirement (s)** | Clause 3.1 |
| **Publication date** | 14. March 2016 |

**Where fuelwood is harvested in a multi-use production system and calculation of the mean annual increment (MAI) is irrelevant to the sustainable harvest of branch wood, can an alternative method be used to confirm low intensity management?**

Yes, it is recognized that MAI may not be appropriate for all silvicultural systems. Justification for an alternative SLIMF definition may be submitted to the closest FSC entity (e.g. National Office) for consideration.

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| **Code** | INT-STD-01-003_02 |
| **Requirement (s)** | Clause 3.1.a |
| **Publication date** | 05. September 2014 |

**One of the requirements to be eligible to be a SLIMF is that the rate of harvesting is less than 20% of the mean annual increment (MAI) within the total production forest area of the unit.**
**Can the rate of harvesting be considered as an average? A potential client does not harvest every year, so the yearly harvested volume can vary greatly, but on average, he qualifies as low intensity.**

Yes, it can be considered an average. The harvesting rate has to be less than 20% of the MAI during the period of validity of the certificate.

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| **Code** | INT-STD-01-003_04 |
| **Requirement (s)** | Clause 3.1 |
| **Publication date** | 30. January 2017 |

**In community forestry, when timber is used for subsistence (e.g. building houses, firewood) but not sold externally,**

a) **For this specific case, is it possible to consider the MUs as SLIMF for low intensity, harvesting less than 5000 m3/year but with the harvest up to 60% of the MAI? Background information: due to the earthquake, there is a high demand for timber for construction, but actually the MPs allowed for this rate of harvest from before this happened. Having entered in a conservation area the requirements is that the % of harvesting is reduced but it will still be more than 20% of MAI.**
b) **In general, do we have to consider at all the harvesting rate (both m3 and MAI) for this cases (timber not sold but for communities/local people use)?**

a) No, it is not possible to consider the MU as SLIMF even if the total harvesting is less than 5.000m3/year because the standard FSC-STD-01-003 for SLIMF eligibility requires that the harvesting intensity remain below 20 % of the MAI.
b) Yes, you have to consider the harvesting rate (both m3 and MAI) despite the timber is not sold but used by communities/local people use, because the certificate holder is responsible for all harvesting in management unit.

# FSC-STD-01-004 (V1-0) FSC REGULATORY MODULE

| Code | INT-STD-01-004_01 |
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| **Requirement (s)** | FSC-POL-01-007 V1-0, Terms and Definitions (conversion)<br>FSC-STD-01-004 V1-0, Clause 1.1.1 a)<br>FSC-STD-01-001 V5-3, Criteria 10.1 and 10.9<br>FSC-STD-60-004 V2-1, Glossary of Terms (conversion)<br>ADVICE-20-007-24, Clause 1 |
| **Publication date** | 01 July 2024 |

**FSC definition of conversion covers lasting changes of natural forest cover or High Conservation Value areas, induced by human activity. Does FSC address non-human induced deforestation?**

Yes, Criterion 10.9 in <FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship> requires The Organization to assess risks and implement activities to reduce potential negative impacts from natural hazards.

Examples of natural hazards that may induce deforestation include drought, fires, landslides, storms, diseases, etc. The Organization prevents and mitigates risks by, among others, having management plans in place, integrated pest management, monitoring systems, managing forests for resilience, etc., which makes FSC an effective measure to reduce the likelihood and impact of non-human induced deforestation. In addition, Criterion 10.1 of <FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship> requires The Organization to regenerate vegetation cover in a timely fashion, by natural or artificial regeneration methods, to pre-harvesting or more natural conditions after harvest or in accordance with the management plan. However, The Organization is not necessarily obliged to restore values that have been affected by natural disasters or by climate change (see definition of restoration).

To address the scenario of non-human induced deforestation **ADVICE-20-007-24 Deforestation-free products from FSC certified management units** prohibits the sale of forest products resulting from conversion of natural forests or lasting transformation of plantations into agricultural use that is not human induced (e.g., following a natural disaster) as FSC certified.

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| **Code** | INT-STD-01-004_02 |
| **Requirement (s)** | FSC-POL-01-007 V1-0, Terms and Definitions (degradation)<br>FSC-STD-01-001 V5-3, Criteria 6.9 and 10.1<br>FSC-STD-01-004 V1-0, Terms and Definitions (degradation)<br>FSC-STD-60-004 V2-1, Glossary of Terms (degradation)<br>ADVICE-20-007-02 V1-0, Clauses 1 and 2<br>ADVICE-20-007-24 V1-0, Clause 3 |
| **Publication date** | 01 July 2024 |

**EUDR defines 'forest degradation' as: structural changes to forest cover, taking the form of the conversion of:**
**a) primary forests or naturally regenerating forests into plantation forests or into other wooded land; or**
**b) primary forests into planted forests.**
**This definition is different from the FSC definition on degradation. Does wood sourced from an FSC certified management unit meet the requirements of being produced without inducing forest degradation as per the EUDR definition?**

Yes, despite the fact that FSC and the EUDR have adopted different definitions for the term degradation, FSC ensures that wood sourced from an FSC certified management unit do not induce forest degradation after 31 December 2020 as required by the EUDR.

**Background:**
Based on the EUDR definition of degradation, wood that has been harvested from the forest inducing any of the following five conversion scenarios is prohibited:

1. Conversion of primary forests into plantation forests,
2. Conversion of primary forests into other wooded land,
3. Conversion of naturally regenerating forests into plantation forests,
4. Conversion of naturally regenerating forests into other wooded land,
5. Conversion of primary forests into planted forests.

NOTE: In the context of this interpretation, the term conversion in the above scenarios is per the EUDR definition.

**For scenarios 1), 2) and 5):**
ADVICE-20-007-02 Certification of primary forests under <FSC-DIR-20-007 FSC Directive on FSC Forest Management Evaluations> states that primary forest may be certified within the FSC system when its management is in conformity with the requirements of the applicable Forest Stewardship Standard.

The definition of primary forests is covered by the FSC definition of natural forests, thus Criterion 6.9 of <FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship> covers primary forests, regulating the conversion of primary forests to plantation forests and to other wooded land.

The definition of conversion includes also gradual forest degradation, i.e., changes significantly and negatively affecting its species composition, structure and/or function, and reducing the ecosystem's capacity to supply products, support biodiversity and/or deliver ecosystem services.

<ADVICE-20-007-02 Certification of primary forests> has been revised to clarify how FSC requirements prevent the change of primary forests to planted forests.

**For scenarios 3) and 4):**
In the FSC system, the characteristics a) to c) of the term "naturally regenerating forest" are covered by the FSC term and definition of "natural forests". Criterion 6.9 of <FSC-STD-01-

001 FSC Principles and Criteria for Forest Stewardship> regulates the conversion of natural forests to plantations or to non-forest land-use.

The EUDR term “other wooded land” largely corresponds to the FSC term and definition on “non-forest land use”, which is, however, broader as it does not exclude land that is predominantly under agricultural or urban land use.

The characteristic d) (naturally regenerated trees of introduced species), however, is not covered by the FSC term and definition of “natural forests” as it refers to a forest area in which all or almost all the trees are native species. See under section “Naturally regenerating forest’ how FSC Interpretation INT-STD-01-004_05 and <ADVICE-20-007-24 Deforestation-free products from FSC certified management units> address these specific conversion scenarios.

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| **Code** | INT-STD-01-004_03 |
| **Requirement (s)** | FSC-STD-01-001 V5-3, Glossary of Terms (forest)<br>FSC-STD-01-004 V1-0, Terms and Definitions (forest) |
| **Publication date** | 01 July 2024 |

**FSC defines ‘forest’ as a tract of land dominated by trees. Is this aligned with the definition of forest by EUDR?**

Yes, FSC does not specify minimum thresholds in terms of area or tree height in its forest definition. Regarding canopy cover, the FSC definitions of ‘natural forest’ and ‘plantation’ specify that it includes a range of forest types, from woodlands and savannas to boreal, temperate and tropical primary forests, some of them with canopies characterized by canopy covers starting at 10%.

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| **Code** | INT-STD-01-004_04 |
| **Requirement (s)** | FSC-STD-01-004 V1-0, Clause 1.1.1 a)<br>ADVICE-20-007_24 V1-0, Clauses 1 to 5 |
| **Publication date** | 01 July 2024 |

**In Regulation (EU) 2023/1115, ‘deforestation-free’ is defined as:**
**a) that the relevant products contain, have been fed with or have been made using, relevant commodities that were produced on land that has not been subject to deforestation after 31 December 2020; and**
**b) in the case of relevant products that contain or have been made using wood, that the wood has been harvested from the forest without inducing forest degradation after 31 December 2020.**
**Do forest products sourced from an FSC certified management unit meet the criteria to be considered 'deforestation-free' as defined by the Regulation?**

Yes, with the enforcement of **ADVICE-20-007-24 Deforestation-free products from FSC certified management units,** forest products originating from an FSC-certified management unit and sold with an FSC claim can be considered 'deforestation-free' as defined by the Regulation.

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| **Code** | INT-STD-01-004_05 |
| **Requirement (s)** | FSC-STD-01-004 V1-0, Clause 1.1.1 a)<br>FSC-STD-01-001 V5-3, Criterion 6.9<br>ADVICE-20-007-24 V1-0, Clause 3 |
| **Publication date** | 01 July 2024 |

**How does FSC address conversion of naturally regenerating forests into plantation forests or into other wooded land?**

The characteristics of a ‘naturally regenerating forest’ according to EUDR are:
a) forests for which it is not possible to distinguish whether planted or naturally regenerated;
b) forests with a mix of naturally regenerated native tree species and planted or seeded trees, and where the naturally regenerated trees are expected to constitute the major part of the growing stock at stand maturity;
c) coppice from trees originally established through natural regeneration;
d) naturally regenerated trees of introduced species.

Characteristics a) to c) fall within the scope of the FSC definition of “natural forests” and their conversion is regulated by Criterion 6.9 of <FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship>.

The conversion scenarios related to characteristic d), naturally regenerating forests composed predominantly of trees of introduced species, are addressed by <ADVICE-20-007-24 Deforestation-free products from FSC certified management units>. It also provides an explanatory note why the removal of invasive species and potential subsequent planting of other, non-invasive species in the interest of protection or ecosystem restoration is not considered conversion under the respective clause in the advice note.

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| **Code** | INT-STD-01-004_06 |
| **Requirement (s)** | FSC-STD-01-004 V1-0, Clause 1.1.1 a)<br>ADVICE-20-007-02 V1-0, Terms and definitions (planted forest)<br>ADVICE-20-007-02 V1-0, Clauses 1 and 2 |
| **Publication date** | 01 July 2024 |

**In EUDR, ‘planted forest’ means forest predominantly composed of trees established through planting and/or deliberate seeding, provided that the planted or seeded trees are expected to constitute more than 50% of the growing stock at maturity; it includes coppice from trees that were originally planted or seeded.**
**Does FSC use the term ‘planted forest’ and how is ‘planted forest’ defined in the FSC system?**

Depending on the intensity of management as well as the different purposes for growth, the EUDR definition for ‘planted forest’ (adopted from FAO (2023)) overlaps with FSC definitions of plantation and natural forest.

According to FAO’s explanation of the definition, ‘planted forests’ can resemble natural ecological processes to a greater or lesser extent. There is a trend towards referring to ‘planted forest’ of exotic species as ‘plantation forests’ (with single or few species, even age class, uniform planting density), which would be equivalent with the FSC definition of ‘plantation’.

Meanwhile, ’planted forests’ of native species are forms of ‘semi-natural forests’ or ‘modified natural forests’ (depending on degree of naturalness, including mixed species and age

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| classes and variable planting density), which would be equivalent with the FSC definition of 'natural forest'.<br><br>Therefore, 'planted forest' can be considered belonging to the 'natural forest' definition, as long as the forest does not meet the FSC definition of 'plantation'.<br><br>In the context of EUDR, the term 'planted forest' is of relevance under the scenario of 'forest degradation' that addresses conversion of primary forests into planted forests.<br><br>FSC has introduced the term 'planted forest' in <ADVICE-20-007-02 Certification of primary forests> to ensure alignment between EUDR and FSC requirements regarding the conversion of primary forest to planted forests. |

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| **Code** | INT-STD-01-004_07 |
| **Requirement (s)** | FSC-STD-01-004 V1-0, Clause 1.1.1 a)<br>FSC-STD-60-004 V2-1, Glossary of Terms (non-forest land-use)<br>ADVICE-20-007-24 V1-0, Terms and definitions (other wooded land) |
| **Publication date** | 01 July 2024 |
| **Does FSC use the term 'other wooded land' and is there a term comparable to this definition in the FSC system?**<br><br>FSC has introduced the term in <ADVICE-20-007_24 Deforestation-free products from FSC certified management units> to ensure alignment between EUDR and FSC requirements regarding the conversion scenario of 'naturally regenerating forests' to 'other wooded land'. The FSC term, however, is wider as it refers to any land not classified as forest, while the EUDR term excludes land that is predominantly under agricultural or urban land use. | |

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| **Code** | INT-STD-01-004_08<br>(also published under FSC-STD-40-004 with code INT-STD-40-004_71 and under FSC-STD-40-005 with code INT-STD-40-005_35) |
| **Requirement (s)** | FSC-STD-01-004 V1-0, Terms and Definition, Clause 1.1.1b)<br>FSC-STD-01-001 V5-3, Criterion 1.5<br>FSC-STD-60-004 V2-1, Annex A |
| **Publication date** | 01 July 2024 |
| **Is compliance with the relevant legislation of the country of production as per EUDR covered by FSC requirements?**<br><br>Yes, for forest management certification, Principle 1 of the <FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship> requires The Organization to comply with all applicable laws, regulations and nationally-ratified international treaties, conventions and agreements. The requirement for Free, Prior and Informed Consent for Indigenous Peoples is covered by Principle 3.<br><br>Further details on the minimum list of applicable laws, regulations and nationally-ratified international treaties, conventions and agreements that Standard Developers have to include in the Forest Stewardship Standard is reflected in Annex A of <FSC-STD-60-004 International Generic Indicators>. | |

For Chain of Custody, as per Clause 6.1 of the <FSC-STD-40-004 Chain of Custody Certification>, “the organization shall ensure that its FSC-certified and controlled wood products or timber products conform to all applicable timber legality legislation." It also further elaborates that trade and customs laws include: "bans, quotas and other restrictions on the export of timber products (e.g., bans on the export of unprocessed logs or rough-sawn lumber), requirements for export licences for timber and timber products, official authorisation that entities exporting timber and timber products may require and taxes and duties applying to timber product exports.

For sourcing material without an FSC claim to be used as controlled material, the risk assessment indicators as per FSC-PRO-60-006b, as well as Annex A, Clause 3.6 of the <FSC-STD-40-005 Requirements for sourcing FSC Controlled Wood> requires the organizations to use the minimum list of applicable laws, regulations, nationally ratified international treaties, conventions, and agreements.

## FSC-STD-20-002 (V3-0) STRUCTURE, CONTENT AND LOCAL ADAPTATION OF GENERIC FOREST STEWARDSHIP STANDARDS

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| **Code** | INT-STD-20-002_05 |
| **Requirement (s)** | Clause 6.3 |
| **Publication date** | 20. April 2015 |

**Is it necessary to conduct a stakeholder consultation when Accreditation Services International (ASI) requires a certification body (CB) to make modifications in the CB generic certification standard in order to comply with FSC Principles and Criteria (conversion rule or indigenous people rights)?**

No, we consider this a correction and not a revision. Compliance with the FSC Principles and Criteria is mandatory and in this case additional stakeholder consultation is not required.

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| **Code** | INT-STD-20-002_04 |
| **Requirement (s)** | Clause 6.3 |
| **Publication date** | 06. June 2014 |

**a) Can certification bodies (CBs) test a new generic Forest Stewardship Standard before the 60-days consultation period has ended?**
**b) Can CBs acknowledge the results of this evaluation later on, under the pre-condition that no changes to the version submitted to public consultation and/or submitted to Accreditation Services International (ASI) for approval had to be made due to comments from stakeholder or ASI?**

a) Yes, a draft standard can be field-tested during the consultation period.
b) No, according to FSC-STD-20-002 clause 6.4 CBs shall complete the process of local adaptation of its generic standard prior to the main evaluation site visits.

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| **Code** | INT-STD-20-002_03 |
| **Requirement (s)** | Clauses 6.3, 6.4. |
| **Publication date** | 04. May 2012 |

**In a CB national standard, a new section has been included, regarding NTFP.**
**Point 4 of ADVICE-20-007-05 states that "The certification body shall use standards prepared or adapted in the region for that NTFP, or it shall prepare its own NTFP standards by a process of national or regional consultation similar to the process currently used for the local adaptation of certification body generic standards (see FSC-STD-20-002). …"**

**1: Does "or" here mean that in this case the CB must undertake the consultation process as referred to in this norm, for the inclusion of this NTFP section to be in compliance?**

**2: If this is the case, must ASI not approve the standard (NTFP part) until this has been done, or would a minor NC with a timeline (1 year) for implementation be in line with the intent of the norm?**

**3: What does "similar" mean in point 4 of ADVICE-20-007-05? Which parts of the standards adaptation and stakeholder consultation process described in 6 and 7 of FSC-STD-20-002 could be excluded?**

1. According to FSC-STD-20-002, clause 6.3, the revised standard shall be submitted to a public consultation for at least sixty days.

2. According to FSC-STD-20-002, clause 6.4, the CB shall complete the process of local adaptation of its generic standard, including the public consultation, prior to the main evaluation site visits.

3. The inclusion of NTFP requirements shall be considered as a revision of a CB Generic Standard, and shall follow all applicable requirements in FSC-STD-20-002

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| **Code** | INT-STD-20-002_02 |
| **Requirement (s)** | Clause 6.3 |
| **Publication date** | 10. April 2012 |

**1. We are currently in the revision process of our generic standard. Can we interpret the fact that we are in the revision process, therefore this is a repeated consultation, and so we only need a 30 day public consultation?**

**2. For repeated consultations in the same country (for different clients), does this mean we need to submit our generic standard for a 30 day public consultation before each audit? Why do we need to do a repeated consultation for different clients?**

1. No, it is not possible to do a 30 day public consultation, because it´s the first time that the revised standard will be submitted to a public consultation. This consultation shall last for at least sixty days.

2. Yes, the generic standard has to be submitted for a formal consultation period of at least thirty days for repeated consultations in the same country (for different clients).

The reason is found in the Standard: NOTE: the consultation period is defined to ensure conformity of the certification body's process with consultation requirements as specified in the ISEAL Code of Good Practice for Setting Social and Environmental Standards.

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| **Code** | INT-STD-20-002_01 |
| **Requirement (s)** | Clauses 9.1, 6.1. |
| **Publication date** | 31. January 2012 |

**Is it possible for a Certification Body (CB) to use an existing adapted generic standard produced by another CB? What is the situation once the CB has checked for non-conformities? Which are the consultation requirements?**

Yes, but only under the following conditions: the existing adapted generic standard shall have the same scope (it shall be applied to the same area (in terms of a country or part of a country) and be limited to the same specific forest type); in addition to this, the CB that produced this generic standard shall agree with this use by providing a written approval.

If these conditions are not met, the CB would need to complete a new consultation process.

## FSC-STD-20-006 (V3-0) STAKEHOLDER CONSULTATION FOR FOREST EVALUATIONS

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| **Code** | INT-STD-20-006_03 |
| **Requirement (s)** | Clause 2.3 h |
| **Publication date** | 03. April 2020 |

**Is it mandatory to consult, at least for main audit process, the international NGOs that are involved or have interest in respect of social or environmental aspects at national or regional level?**

Yes, if the international NGO has requested to be contacted in respect of evaluations in a particular region or country even if this NGO is not based in the country of evaluation.

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| **Code** | INT-STD-20-006_01 |
| **Requirement (s)** | Clause 2.6 |
| **Publication date** | 08. October 2014 |

**Does clause 2.6 apply to re-evaluations for a new five years certification? The language in the clause only includes reference to main evaluations.**

Yes, it applies. Clause 7.2 in FSC-STD-20-007 states that the re-evaluation shall follow the same procedures as for the main evaluation (except for some exceptions which does not include public consultation). Then clause 5.4.5 states that in the main evaluation the certification body procedures for the consultation shall comply with the requirements of FSC-STD-20-006 Stakeholder Consultation for Forest Evaluation. Therefore, it applies to both main evaluation and re-evaluation.

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| **Code** | INT-STD-20-006_07 |
| **Requirement (s)** | Clause 2.6.c |
| **Publication date** | 30. April 2025 |

**To demonstrate conformity with Clauses 1.1 and 2.6.c) of FSC-STD-20-006 V3-0, is it sufficient for the certification body to provide high-level information to identified stakeholders about the location of the forest area to be assessed by, for example, informing the stakeholders about the region(s) the forest area is located in?**

No, providing only high-level information, such as the region or administrative area where the forest is located, is not sufficient to meet the requirement of Clause 2.6.c).
The certification body shall ensure that stakeholders receive location details that enable them to meaningfully assess and provide feedback on the certificate holder’s conformity, by providing maps (or links to online maps) or other adequate location information of the forest area (Management Unit) under assessment.

| Code | INT-STD-20-006_04 |
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| **Requirement (s)** | Clauses 2.6 and 2.9 |
| **Publication date** | 20. May 2020 |

**What shall the Certification Body do to meet the requirement in clause 2.9 of FSC-STD-20-006 and what are the requested timelines?**

The certification body shall ensure that stakeholders have access to the information listed in FSC-STD-20-006 Clause 2.6, at least six (6) weeks prior to the main evaluation taking place. The certification body shall ensure that there is adequate opportunity for stakeholders to comment directly to the certification body. In areas where tensions with stakeholders are known to exist certification bodies shall carry out direct consultation with local and, where appropriate, national stakeholders.

| Code | INT-STD-20-006_05 |
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| **Requirement (s)** | Clause 2.9 and 5.1 |
| **Publication date** | 24. February 2021 |

**It is stated in clause 2.9 that '*The certification body may delegate some or all of the implementation of this communication to the applicant, but shall ensure that stakeholders have access to the information listed in the Clause 2.6, above, prior to the main evaluation taking place*'.**

**Shall the certification body keep records of stakeholder consultation (as per Clause 5.1) when the consultation has been delegated to the applicant managing SLIMF eligible Management Units (MUs) (as per clause 2.9)?**

Yes, the certification body shall keep records of stakeholder consultation listed in FSC-STD-20-006 Clause 5.1, including consultations delegated to the applicant according to FSC-STD-20-006 Clause 2.9.

| Code | INT-STD-20-006_02 |
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| **Requirement (s)** | Clause 3.2 |
| **Publication date** | 13. February 2015 |

**FSC-STD-20-006, clause 3.2 reads: "Consultation and interviews with stakeholders (including workers, staff or subcontractors) shall be carried out in confidence if requested. Consultation and interviews shall therefore, necessarily, be carried out without the presence of the forest manager(s) and/or their representatives or any supervisors".**
**a) Does it mean that if the confidence is not requested by a stakeholder, the interview can be conducted with presence of company representatives and supervisors?**
**b) Is it sufficient that the auditor asks the interviewee, if he/she wants to stay in confidence or not?**

a) The interview can be conducted with the presence of company representatives and supervisors if general issues are discussed, but as soon as sensitive or confidential information is subject of the conversation the interview shall be conducted without their presence, even if the interviewee did not request it.
b) The auditor shall always offer the opportunity that the interview is carried out in

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| confidence and this offer should be done when the supervisor is not present. Confidence refers not only to the content of the interview but also to the fact that the worker is providing feedback. |

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| **Code** | INT-STD-20-006_06 |
| **Requirement (s)** | Clause 5.1<br>INT-STD-20-007a_02 |
| **Publication date** | 24. June 2021 |

**Is it always required to record the names and contact details of individuals and organisations consulted on the applicant's conformity with the requirements of the applicable Forest Stewardship Standard, even in situations where it is not considered culturally appropriate to formally record this information?**

No, not always. In cases where individuals, organizations or communities have chosen not to have their names and contact details recorded when responding to FSC consultations, it is only required to record the type of stakeholder consulted (see Annex 1 of FSC-STD-20-006 for reference). The certification bodies shall respect all applicable data protection legislation when applying FSC-STD-20-006.

# FSC-STD-20-007 (V3-0) FOREST MANAGEMENT EVALUATIONS

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| **Code** | INT-STD-20-007_30 |
| **Requirement (s)** | Definition of group member |
| **Publication date** | 16. June 2014 |

**Is group certification applicable for large ownerships, which are divided into several management units? (E.g. a State forest)**

Yes, according to the definition of group member in FSC-STD-20-007, the members of a group may be forest owners or forest managers. Therefore, the forest managers of the several management units may form a group.

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| **Code** | INT-STD-20-007_47 (also published under FSC-STD-40-004 with code INT-STD-40-004_37) |
| **Requirement (s)** | Definition 'Joint certification' of FSC-STD-20-007; Clause 2.4 of FSC-STD-40-004 |
| **Publication date** | 07 February 2018 |

**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?**

Yes, the wood may be considered as FSC-certified under the following conditions:

- the Forest Management Unit has to be FM/CoC certified at the time of harvesting
- 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.

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| **Code** | INT-STD-20-007_17 (also published under FSC-STD-30-005 with code INT-STD-30-005_04) |
| **Requirement (s)** | Section D |
| **Publication date** | 28. November 2013 |

**Regarding to special or adapted requirements for Type II groups:**

**1. Can CBs certify RMUs as single FMU certificate?**
**2. If 30-005 is applicable, which are the requirements for RMUs (group entity but also group members) if group members have almost no rights and responsibilities?**

1. No, the RMU can be used as the basis for sampling as if it were a single FMU certificate, but it has to comply with the rest of requirements for groups and be certified as a group.

2. RMUs shall comply with all the applicable requirements in FSC-STD-30-005 (V1-0).

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| **Code** | INT-STD-20-007_18 |
| **Requirement (s)** | Section D, Clause 1.5 |
| **Publication date** | 28. November 2013 |

**A large remote plantation in Tanzania includes extensive infrastructure (housing, hospital, sawmill, processing plant).**

**1. What aspects of these operations should be assessed within the scope of the FM/CoC operation (as distinct from a separate CoC certificate)?**
**2. What if the sawmill fails to get the CoC certification?**

1. The scope of FM/CoC certification includes the assessment of forest management and the tracking and tracing system of forest products (incl. NTFPs) within the forest management unit up to the forest gate.
If the housing and hospital are within the FMU and linked to the forest management activities and the Organization has directly or indirectly responsibility, they have to be assessed according to the FM standards.

Primary or secondary processing facilities associated with the forest management enterprise shall be assessed according to the CoC standards, with the exception of log cutting or de-barking units and small portable sawmills associated with the forest management enterprise. The sawmill and the processing plant shall be assessed according to the CoC standards.

2. If the sawmill is eligible to be included in the scope of FM/CoC certificate and fails to comply with CoC requirements, the products coming out of the sawmill are not eligible to carry the FSC Logo.
If the sawmill is not within the scope of FM/CoC certificate, it requires its own CoC certification. Failure to comply with the applicable CoC requirements would not allow issuing a CoC certificate.

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| **Code** | INT-STD-20-007_11 |
| **Requirement (s)** | Section D |
| **Publication date** | 06. February 2012. Updated on 06. May 2022 to remove references to CoC |

**Can 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?**

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.

| Code | INT-STD-20-007_09 (also published under FSC-DIR-20-007 with code INT-DIR-20-007_01) |
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| **Requirement (s)** | Section D. |
| **Publication date** | 31. January 2012 |

**Can a Certification Body (CB) certify a young plantation as Forest Management (FM) only (instead of FM/CoC (Chain of Custody))?**

No, plantations must have an FM/CoC certificate. They are considered as commercial operations and the aim of the forest management is to sell timber. According to FSC-STD-20-007, "...Forest products must be covered by a valid Chain of Custody certificate, or by a joint Forest Management/Chain of Custody certificate, in order to be eligible to carry the FSC Logo and to enter into further chains of custody".

In accordance with Advice-20-007-05 in FSC-DIR-20-007, whenever the aim of the forest management is to sell timber, non timber forest products or ecosystem services, there is need to have a CoC certificate or a joint FM/CoC certificate issued by an FSC-accredited certification body which includes the specified product(s) within its scope.

| Code | INT-STD-20-007_62 |
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| **Requirement (s)** | Section D and Clause 5.3.2 |
| **Publication date** | 02. September 2021 |

**According to the the definition a Resource Management Unit (RMU) is a "set of FMUs managed by the same managerial body (e.g. the same resource manager). In the case of small operations, RMUs may be used as the basis for sampling."**
**Can RMUs also be used as the basis for sampling calculated according to clause 5.3.2 in case of multiple FMU certificates?**

No, the RMU concept has its origin in the FSC-STD-30-005 *Forest Management Groups* standard and is only applicable for FM, FM/CoC and CW/FM group certificates.
It allows that some management units are included under an RMU, where the resource manager has assumed responsibility for ensuring conformity with all applicable FSC normative requirements on behalf of the forest owner.

| Code | INT-STD-20-007_55 |
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| **Requirement (s)** | FSC-STD-20-007 V3-0 Section 1 and Clause 5.4.3<br>FSC-STD-20-001 V4-0 Clause 1.4.6 and Clause 4.8.3 |
| **Publication date** | 19.June. 2019 |

**Is it possible to add new forest lands (either complete management units (MUs) or individual sites) to the scope of a single or multiple FM/CoC certificate before the next on-site surveillance audit?**

Yes, in principle they can be added to the scope of the certificate before the next on-site surveillance audit. This is considered a change in scope and needs to be in line with FSC-STD-20-001 V4-0 Clause 1.4.6 and Clause 4.8.3.

Thus, it's the responsibility of the CB to decide whether an on-site audit is required before approving the change in scope, based on a risk-based analysis that takes into account the following:

- FSC-STD-20-007 V3-0 Section 1: a forest management certificate provides assurance that there is no major failure in the conformity with the requirements of the applicable Forest Stewardship Standard within the scope of the certificate; and

- FSC-STD-20-007 V3-0 Clause 5.4.3: sites for inspection shall be selected based on an evaluation of the critical points of risk in the management system.

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| **Code** | INT-STD-20-007_34 |
| **Requirement (s)** | Clause 1.5 |
| **Publication date** | 21. April 2015 |

**In joint FM/CoC certificates including primary or secondary processing facilities,**
**a) Shall the number of major non-conformities for FM evaluation and COC evaluation be considered cumulative or will they be handled separately within the same certificate?**
**b) In the main evaluation and re-evaluation, will a major non-conformity at processing unit result in a precondition for joint FM/COC certificate or only a pre-condition for COC part of the scope?**
**c) In a surveillance evaluation, will four major non-conformities for FM evaluation and one major non-conformity for COC evaluation constitute a suspension of the entire FM/COC certificate?**

a) This is a single certificate and therefore major non-conformities for FM evaluation and CoC evaluation shall be considered cumulative.
However, suspension is defined as a temporary invalidation of the FSC certification for all or part of the specified scope of attestation. Consequently suspension of a part of the scope would be possible if all major non-conformities relate only to one part of the scope (FM or CoC).
b) A major non-conformity at any part of the scope will result in a precondition for the certificate.
c) Yes, if the five major non-conformities relate to both FM and CoC evaluation, partial suspension of the scope is not possible.

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| **Code** | INT-STD-20-007_26 |
| **Requirement (s)** | Clause 1.5 |
| **Publication date** | 06. June 2014 |

**For situations where it is allowed to include processing facilities in the scope of joint FM/CoC certificates, can FSC CoC multisite also be applied (if all other conditions are met)?**

Yes, in situations where primary or secondary processing facilities can be included in the scope of an FM/CoC certificate and it is required auditing them against the applicable CoC standard(s), FSC-STD-40-003 may also be applied.
(Note: See all conditions in previous interpretation on clause 1.5 from 28th November 2013).

| Code | INT-STD-20-007_20 |
|---|---|
| Requirement (s) | Clause 1.5. |
| Publication date | 28. November 2013 |

**According to FSC-STD-20-007, primary or secondary processing facilities associated with the forest management enterprise shall be inspected for conformity with the applicable CoC standard(s), and a separate report which meets the requirements of FSC-STD-20-011 Annex 1 shall be prepared.**

**Are there any further definitions or criteria (concerning size, number of workers, quantity of processed material, permanent vs. mobile facilities, permanent or occasional workers in charge of processing) to define the "processing facility"? If so, please specify.**

No, there is no further definition or criteria in FM or CoC standards. Log cutting or de-barking units and small portable sawmills associated with the forest management enterprise are an exception to this clause and they can be evaluated as part of the ‘normal’ forest evaluation procedures. Small sawmills which are only in use temporarily or log chipping units also do not require a separate CoC evaluation and report.

| Code | INT-STD-20-007_19 |
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| Requirement (s) | Clause 1.5 |
| Publication date | 28. November 2013 |

**Can a FM/CoC certificate include primary or secondary processing facilities?**

No, primary or secondary processing facilities associated with the forest management enterprise shall be inspected for conformity with the applicable CoC standard(s), a separate report which meets the requirements of FSC-STD-20- 011 Annex 1 shall be prepared and a separate CoC certificate shall be issued.

This does not apply to log cutting or de-barking units and small portable sawmills associated with the forest management enterprise. They can be evaluated as part of the ‘normal’ forest evaluation procedures.

Exception: It's possible to exceptionally include processing facilities in the FM/CoC certificate scope, if all of the following conditions are met:

- it is owned or managed by the Organization holding the joint certificate;
- the processing plant procures all its supplies from a certified Management Unit within the scope of the certificate, i.e. it does not buy in certified timber from other certificates;
- the processing plant is audited against the applicable CoC standard(s);
- a separate CoC report is prepared meeting CoC reporting requirements;
- the AAF is calculated separately for the forest area and the processing plant.

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| **Code** | INT-STD-20-007_04 |
| **Requirement (s)** | Clause 1.5 NOTE |
| **Publication date** | 19. July 2010 |

**Would a separate CoC evaluation and report be required for mobile wood chippers, where the chips are produced in the FMU?**

No. This would not be required. FSC-STD-20-007 V3 does not include woodchips specifically. This should be treated the same as for 'small portable sawmills.'

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| **Code** | INT-STD-20-007_61 |
| **Requirement (s)** | Clause 1.5 |
| **Publication date** | 28.October 2020 |

**Would a separate CoC evaluation and report be required for small portable charcoal kilns located within the management unit?**

No, this is not required for small portable charcoal kilns processing wood from the same certified Management Unit (MU). This should be treated the same as for small portable sawmills (see note to Clause 1.5).

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| **Code** | INT-STD-20-007_35 |
| **Requirement (s)** | Sections 3, 5, 7 |
| **Publication date** | 24. July 2015; 07.Nov 2018 updated to clarify that the the interpretation applies also to multiple FM. |

**An Organization will leave an existing FM group or multiple FM valid certificate and switch to a single certificate. Shall the upcoming assessment be made according to a pre-evaluation, a main evaluation or a re-evaluation?**

Former members of groups are considered applicants for certification if they leave the group and apply for a single certificate.
A pre-evaluation may be waived, even if required by 20-007 section 3, if the upcoming assessment is done no later than 12 months of the Organization leaving the group.
In that case, the assessment shall be conducted following the requirements of a main evaluation.

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| **Code** | INT-STD-20-007_29 |
| **Requirement (s)** | Section 3 |
| **Publication date** | 06. June 2014 |

**Is there a time limit beyond which a pre-evaluation expires and another one is required?**

The results of the pre-evaluation are valid for a period of 24 months from the date of finishing the on-site audit of the pre-evaluation. After this period, a new pre-evaluation shall be carried out.

| Code | INT-STD-20-007_28 |
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| **Requirement (s)** | Section 3 |
| **Publication date** | 06. June 2014 |

**Is it accepted to have a pre-evaluation from a certification body (CB) and then a main evaluation from a different CB?**

Yes, but the second CB needs to have access to the results of the pre-evaluation and the results must still be valid (i.e. not older than 24 months). Otherwise, a new pre-evaluation is required.

| Code | INT-STD-20-007_02 |
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| **Requirement (s)** | Section 3 |
| **Publication date** | 04. July 2008 |

**Do Pre-Evaluations require on-site visits?**

The implementation of the requirements listed in FSC-STD-20-007 V3-0 Section 3 (Pre-Evaluation) requires an on-site audit to credible conduct the evaluation of the management system and the gap analysis.

| Code | INT-STD-20-007 _43 |
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| **Requirement (s)** | Section 3 |
| **Publication date** | 08. June 2017 |

**Is it allowed to use the draft of a National Forest Stewardship Standard (P&C V-5) at the pre-assessment, and the National Forest Stewardship Standard (P&C V-4) at the main evaluation (without having to repeat the pre-assessment with the old standard)? Note. This is in case the National Forest Stewardship Standard according to V5 is not approved and effective by the time a main evaluation is needed.**

Yes, in this case it is allowed to use the draft National Forest Stewardship Standard (P&C V-5) at pre-assessment, and then the National Forest Stewardship Standard (P&C V-4) at main assessment.

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| **Code** | INT-STD-20-007_31 |
| **Requirement (s)** | Clause 3.1.1 |
| **Publication date** | 08. October 2014 |

**A certificate holder certified to the Controlled Wood standard for Forest Management Enterprises (FSC-STD-30-010) is seeking to upgrade to a Forest Management certificate. The certificate meets the requirements in Clause 3.1.1 for a mandatory pre-evaluation. Would it be possible to waive the pre-evaluation based on the level of preparedness from the Controlled Wood certificate and proceed directly to the Forest Management main evaluation?**

Yes, we consider the Controlled Wood certificate as a sufficient guaranty that the major gaps or likely problems regarding the requirements of the standard(s) have been identified and that there is a familiarity between the certification body, forest management enterprise and the requirements of the standard to be used in the main evaluation. Therefore, it may replace it. However, this is optional and pre-evaluations may still be conducted at the discretion of the certification body or the company.

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| **Code** | INT-STD-20-007_08 |
| **Requirement (s)** | Clause 3.1.1 |
| **Publication date** | 08. December 2011 |

**What is the definition of 'Large' (enterprises) in FM Certification?**

Clause 3.1.1 refers to the following as 'large':

a) Plantations larger than 10,000 ha;
b) All non-plantation forest types larger than 50,000 hectares, unless the whole area meets the requirements for classification as a "low intensity managed forest".

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| **Code** | INT-STD-20-007_15 |
| **Requirement (s)** | Annex 1. Clause 3.4. |
| **Publication date** | 11. September 2013 |

**In an FM Group comprised of SLIMF FMUs grouped in a Resource Management Unit (RMU), what is the basis for sampling: the FMUs or the RMU?**

The RMU concept applies to sets of SLIMFs managed by the same managerial body applying the same forest management concept. The RMU may be used as the basis for sampling. Sampling within an RMU shall be conducted in accordance to Clause 5.4.2 in a main- and re-evaluation and in accordance to Clause 6.3 in a surveillance evaluation. Consequently, it is up to the auditor(s) to select the sites for evaluation, provided that a sufficient variety and number of sites within the RMU are visited.

| Code | INT-STD-20-007_46 (also published with code INT-STD-20-001_24) |
|---|---|
| Requirement (s) | Sections 3, 5 and 7 |
| Publication date | 24. January 2018 |

**FM group members (sub-group A) will leave an existing FM group (B) with a valid certificate and switch to / re-establish a separate group certificate for A, staying with the same certification body. A hold a group certificate in the past before merging with B.**

**a) Shall the upcoming assessment be made according to a pre-evaluation, a main evaluation or a re-evaluation?**
**b) Are peer reviews required for A, who have been certified since 15 years and who were peer-reviewed 15 years ago?**

a) Former members of groups are considered applicants for certification if they leave the group and apply for a new certificate.
As the pre-evaluation is conducted to determine the applicant's readiness for their main evaluation, in this scenario a pre-evaluation may be waived, even if required by FSC-STD-20-007 Section 3, if the upcoming assessment is done no later than 12 months of the group members leaving the group.
In that case, the assessment shall be conducted following the requirements of a main evaluation.
b) Yes, the certification body is required to submit the evaluation report for peer review following the requirements in FSC-STD-20-001 V4-0 EN Section 4.4 Audit review.

| Code | INT-STD-20-007_07 |
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| Requirement (s) | Clause 5.3.1 |
| Publication date | 08. December 2011 |

**Forest types (natural/ semi-natural vs. plantation) – are these the only forest types to be used for 'like' FMUs?**

Yes. These are the only forest types. However, there are other categories to consider as 'like' FMUs.
The categories are those mentioned in FSC-STD-20-007 V3-0 Clause 5.3.1:

- Natural/semi-natural
- Plantation
- Those defined by the national standards
- Size of FMUs

| Code | INT-STD-20-007_50 |
|---|---|
| **Requirement (s)** | Clause 5.2.1 Note |
| **Publication date** | 15.June.2018 |

**According the note in clause 5.2.1, a fully documented management system is expected for large enterprises while a system based on verbal descriptions and simple documentation may be sufficient to implement the requirements of the applicable Forest Stewardship Standard for small scale or low intensity enterprises.**
**Does 5.2.1 impose additional documentation requirements for certificate holders beyond the applicable Forest Stewardship Standard?**

No, the requirements the certificate holders (CH) have to comply with have to be included in the standards and procedures targeted to the CH, such as the Forest Stewardship Standard, the Standard for Group Entities in Forest Management Groups (FSC-STD-30-005) or the Pesticides Derogation Procedure (FSC-PRO-30-001).
FSC-STD-20-007 is not targeted to CHs. The objective of this standard is to clarify the principles to be followed by certification bodies when sampling management units and sites, and integrating the observations to come to a reliable certification decision.

| Code | INT-STD-20-007_40 |
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| **Requirement (s)** | Clause 5.3.1 |
| **Publication date** | 03. June 2016 |

**Are there any possible exemptions of the requirement 5.3.1 of FSC-STD-20-007? Especially if the formation of additional set of like FMUs will lead to a concentration of resources on one FMU and thus not leading to representative sampling.**

**Can we put an FMU into another (higher) size class unless the total sample is not reduced?**

CBs are allowed to group FMU to another higher size class provided the total sample is not reduced.

| Code | INT-STD-20-007_36 |
|---|---|
| **Requirement (s)** | Clause 5.3.2 |
| **Publication date** | 24. July 2015 |

**In regard to FSC-STD-20-007, 5.3.2, why do certification bodies (CBs) need to calculate the sampling based on the whole number of forest management units (FMU) in the scope of certificate, instead of on the number of FMUs within the set of ‘like” FMUs? It increases a lot the sampling in each set and it is not clear why the number of FMUs from one set should influence the sampling number in another set.**

We accept that for multiples FMUs the calculation can be done considering “y” as being the number of FMUs within the set of ‘like” FMUs.

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| **Code** | INT-STD-20-007_44 (also published with code INT-STD-30-005_08) |
| **Requirement (s)** | Clause 5.3.5 Note |
| **Publication date** | 24. January 2018. Updated on 20.March 2018. |

**FSC-STD-30-005 introduce concept 'landscape level requirements' (*requirements of the applicable Forest Stewardship Standard that are implemented at the level of the group entity in a forest management group (e.g. protection of representative samples of ecosystems, protection of high conservation values)*), and a note in FSC-STD-20-007 Clause 5.3.5 says: '*Responsibilities for meeting the applicable criteria shall not be 'traded' between different members*'**
**These two standard clauses seem to be contradictory.**

**a) Can set-aside areas be shared between members in a group?**

**b) What happen if a member decides to leave the group and join another group if that member constitute a large part of the common set-aside area?**

**c) What happens if the member is a member in several groups?**

a) As a general rule, each group member shall comply with the requirement of maintaining set-aside areas, in each Management Unit.
Only in the case of SLIMF groups, set-aside requirements can be met at the entity level provided that the group has established such division of responsibilities in the management system between the group entity and the group members.
SLIMFs below 50 ha can meet set-aside requirements outside the group, provided that the requirements in INT-STD-01-001_09 are met.

b) The group has to constitute new set-aside area(s) to remain in conformity with the set-aside area requirements. A shift to new areas needs to be evaluated and approved by the certification body.

c) A group member (forest owner or forest manager who participates in a group scheme) can belong to different Group entities).However, not with the same Management Unit (as per Clause 4.1.10 in 20-001 FSC-STD-20-001 V4-0). Therefore, in this context this scenario would be irrelevant.

| Code | INT-STD-20-007_45 |
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| **Requirement (s)** | Clauses 5.3.5 and 5.3.6 |
| **Publication date** | 24. January 2018. Updated on 20.March 2018. |

**We understand that the evaluation of FSC FM standards is as per management unit not at group level. However there is a note* under INT-STD-01-001_09 giving the feeling that it can be at the group level.**
**Could you clarify whether aggregating the 10% Conservation Area Network at the group level is possible?**
***Note: This interpretation does not eliminate the option for SLIMF operations (according to FSC-STD-01-003) to meet the requirement of min. 10% Conservation Area Network at the level of the group entity within a group certification scheme (see: FSC-STD-20-007, clause 5.3.6).**

As a general rule, each group member shall comply with the requirement of maintaining a minimum 10% Conservation Area Network, in each Management Unit..

Only in the case of SLIMF groups, this requirement can be met at the group entity level, if the group has established such division of responsibilities in the management system between the group entity and group members.

Moreover, SLIMFs below 50 ha can meet set-aside requirements outside the group, provided that the requirements in INT-STD-01-001_09 are met.

| Code | INT-STD-20-007_37 |
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| **Requirement (s)** | Clause 6.1.1 |
| **Publication date** | 14. December 2015 |

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?

In the case of a demonstrated security risk for the life or health of auditors, the Certification Body may apply for derogation from PSU to replace an on-site audit by a desk audit. The application shall include:

a) Certificate code of the company;
b) Copy of open non-conformities to be checked in the audit;
c) Evidences of security risks confirmed through verifiable public sources (e.g. an official travel warning);
d) Other additional information, as required by FSC.

Derogation applications will be evaluated on a case by case basis.

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| **Code** | INT-STD-20-007_05 |
| **Requirement (s)** | Clause 6.3.1 |
| **Publication date** | 08. December 2011 |

**Can a CB claim the same field period for a surveillance and a re-evaluation and write two reports? Does it make a difference if it is a SLIMF?**

No. A surveillance visit and a re-evaluation visit cannot take place at the same time, firstly as they have a different scope and secondly since surveillance needs to occur annually (meaning once a year) between the main audit and the re-evaluation. The main audit take place in year zero and the re-evaluation takes place in year five. A certificate can only be extended through a re-evaluation.

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| **Code** | INT-STD-20-007_23 (also published under FSC-STD-30-005 with code INT-STD-30-005_05) |
| **Requirement (s)** | Clause 6.3.3 |
| **Publication date** | 19. February 2014 |

**a) There are contradictory definitions for stratification of group members according to size:**
**FSC-STD-30-005 Clause 8.3 requests the group entity to separate between large members above 1000 ha and small members below 1000 ha.**
**At the same time, according to Clause 8.4, the group entity shall use the same stratification the certification body (CB) but FSC-STD-20-007 identifies four different size classes for stratification.**

**b) There is a problem with indicator 8.4 and 8.5 of FSC-STD-30-005: they request the group entity to do an internal monitoring of members different to the external monitoring. If there is only one member in one size class this is not possible and a sampling does not result in a sample, but in one member every year.**

**c) In addition for FMU < 100 ha, which consequently have the lowest risk, the audit intensity would be significantly higher than for larger forests.**

a) There is no contradiction. Clause 8.4 states that for monitoring purposes the group entity should use the same stratification into sets of ‘like’ FMUs as defined by the CB in their evaluation. Should indicates advice, it is not mandatory.
However, compliance with the requirements in FSC-STD-30-005 and FSC-STD-20-007 is possible following these steps:

1. Separating the members above and below 1000 ha.

2. Doing a further division of each group between <100 ha and 100 – 1000 ha (for members below 1000 ha) and between 1000 – 10000 ha and >10000 ha (for members >1000 ha.)

b) Clause 8.5 states that the group entity should visit different members in their annual monitoring than the ones selected for evaluation by the CB (…). Should is a recommended way, not a requirement if it is not possible because there is one member per class. If there are alternatives the group entity should not visit the same members.
c) FSC-STD-20-007 Clause 6.3.3 provides with specific sampling rules for groups or sub-groups of SLIMFs with less than 100 members that comply with the clause.

| Code | INT-STD-20-007_14 |
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| Requirement (s) | Annex 1; Clause 6.3.3 |
| Publication date | 26. August 2013 |

**How are the two step approach and the definition of levels to be implemented? If size sets within the group are obligatory, there will be one set for each size class, then how can I do a two step approach in this situation? Am I allowed to do a sample only in one size class?**

**Or does this apply only for different sets within the same size class, e.g. group members managing plantations and group members managing natural forest?**

**If a sample within each size class is required, another problem occurs: If 20 members are within the size class 1.000-10.000 ha and only 1 member is smaller, the sampling intensity will become much higher in the lower size class. I have to visit the one member every year.**

**The same applies the other way round: 20 members between 100 and 1.000 ha, one member 1.100 ha. The sample of 0'2 SRT one member will result in one, I have to audit this member every year instead of every five years.**

When evaluating FM Groups made up of small size FMUs (≤ 1,000 ha), the minimum number of units to be sampled must be calculated using the 2-step approach. All FMUs shall be divided into groups, according to their size, obtaining size-sets. The 2-step approach will then be applied to each of these size-sets, obtaining the minimum number of FMUs (or set of 'like' FMUs) to be sampled within each of the size-sets. Therefore, it is not allowed to do a sample only in one of the size-sets.

The 2-step approach shall be applied to each size-set, whether there are other sets of 'like' FMUs within these size-sets or not (see examples here).

The CB shall carry out one or more FMU level site visits annually, except for groups or sub-groups of SLIMFs with less than 100 members that comply with the requirements specified in clause 6.3.3 of the FSC-STD-20-007. In these cases, the certification body shall carry out at least one FMU level site visit at the end of the first year in which the certificate was issued, and at least one additional FMU level site visit during the period of validity of the certificate. If there are no outstanding corrective actions to be evaluated and no unresolved complaints requiring evaluation the remaining surveillance evaluations may be based on review of documentation and records specified in 6.2, and do not require FMU level site visits.

Clause 6.3.3 shall be applied at the level of sets of 'like' FMUs, once all the FMUs have been classified according to size, forest type and applicable national or regional standard.

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| **Code** | INT-STD-20-007_22 |
| **Requirement (s)** | Clause 6.3.5 |
| **Publication date** | 19. February 2014 |

**a) According to 6.3.5 in the surveillance evaluation, if new FMUs have been added to the scope of the certificate since the main evaluation, the new FMUs shall be sampled at the rate of a main evaluation.**
**Then, if a new member has been added to a group consisting of 5 members in the size class 100-1000 ha, a sampling within the new members will result in a sample of one. This is rather a full evaluation than a sample.**
**In this case, would it be necessary to calculate the sample separately for old and new members or, if the number of members is below 5 per stratum, is possible to group them together in one stratum to allow sampling?**
**b) How long will this separate calculation be maintained after the new members joined the group? Will they remain in the new stratum until the next main evaluation? Or will they be assigned to the strata of the old members after being sampled at the rate of a main evaluation in the first year?**

a) The new FMUs shall be sampled at the rate of a main evaluation, regardless of the number of members per stratum. The sampling rule can only been changed in the revision of the standard.
b) Members added to the certificate since the last main evaluation can be assigned to the strata of old members after they have been sampled at the rate of a main evaluation once.

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| **Code** | INT-STD-20-007_16 |
| **Requirement (s)** | Clause 6.3.5 |
| **Publication date** | 28. November 2013 |

**FSC-STD-20-007 requires that new FMUs (e.g. group members or newly acquired FMUs) added to the scope of the certificate since the main evaluation shall be sampled at the rate of a main evaluation.**
**Shall they also be sampled at the rate of a main evaluation, if they have previously been certified under another group scheme or an individual certificate?**

New FMUs added to the scope of an existing certificate that have been previously certified (within the last 6 months) may be sampled at the rate as for annual surveillance, instead of the rate of the main evaluation.

| Code | INT-STD-20-007_48 |
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| **Requirement (s)** | Clause 6.3.5 |
| **Publication date** | 20.March 2018 |

**Existing certified groups have decided to merge to form one common group under the head of one former group.**
**FSC-STD-20-007, clause 6.3.5 mention "new members", without precisely mentioning their former status (certified/uncertified). Furthermore, the critical points of risk in the management system at management unit (MU) level are expected to be low as they were already part of groups with a similar structure before.**
**What is the correct method to calculate the sampling rate in case two or more long-time FSC FM certified groups merge to form a new FSC FM group?**

If the new management units (MUs) are added to the scope of an existing group certificate (with a certified group entity and group management system) and they have been certified within the last 6 months, they may be sampled at the rate as for annual surveillance, instead of at the rate of the main evaluation.

If merging results in a new group (with a new group management system), the new MUs shall be sampled at the rate of a main evaluation, since former group members are considered applicants for certification when leaving a group to apply for a new certificate.

| Code | INT-STD-20-007_52 (also published with code INT-STD-30-005_09) |
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| **Requirement (s)** | Clause 6.3.5 |
| **Publication date** | 02. August 2018 |

**According to the sampling rules for new Management Units (MU) which have been added to the scope of certificate since the last evaluation, new MUs shall be sampled at the rate of a main evaluation (see also interpretations INT-STD-20-007_16, INT-STD-20-007_22 and INT-STD-20-007_48).**
**Shall certification bodies evaluate the new MUs against all applicable requirements of the applicable Forest Stewardship Standard?**

In the case of group certification, the certification body or the group entity shall evaluate every applicant for membership of the group and ensure that there are no major nonconformities with applicable requirements of the Forest Stewardship Standard, and with any additional requirements for membership of the group, prior to being granted membership of the group.
NOTE: for applicants complying with SLIMF eligibility criteria for size, the initial evaluation may be done through a desk audit.

| Code | INT-STD-20-007_54 |
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| **Requirement (s)** | Clause 6.3.5, Annex 1 Clause 2.4 |
| **Publication date** | 12. 02. 2019 |

**FSC-STD-20-007 Annex 1 Clause 6.3.5 requires that new management units (MUs) added to the scope of the certificate since the main evaluation are sampled at the rate of a main evaluation.**
**Annex 1, Clause 2.4 requires that large and medium size management units (MU) within the group are visited on-site by the certification body at least once in a 5 years certificate period.**

**If new large or medium size members are added to the scope of the certificate prior to the last surveillance audit, does the sampling at the rate of a main evaluation apply or shall each of them be visited on-site in the last surveillance audit in conformance with Annex 1, Clause 2.4?**

Both clauses are applicable but Clause 2.4 in Annex 1 has the higher demand that needs to be fulfilled. Therefore, large or medium size members added to the group before the last surveillance audit shall be visited on site by the certification body in the audit.

| Code | INT-STD-20-007_60 |
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| **Requirement (s)** | Clause 6.3.5 and Clause 6.3.6 |
| **Publication date** | 05.October 2020 |

**In relation with the publication of updated list of small and low intensity managed forests (SLIMF) group members, would it be acceptable that a list of SLIMF group members is published after the annual audit (alternatively to on a quarterly basis)?**

Yes, it is acceptable to publish a list of SLIMF group members after the annual audit, or alternatively on a quarterly basis. However, national and international data protection regulations shall be observed and they shall not be violated.

| Code | INT-STD-20-007_32 |
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| **Requirement (s)** | Clause 6.3.7 |
| **Publication date** | 08. October 2014 |

**a) In clause 6.3.7, what is the interpretation of “during the period of validity of the certificate”?**

**b) Is it necessary to monitor all aspects of the Forest Stewardship Standard in the surveillance audits from year one to four or could we also consider the re-evaluation audit as a part of this period?**

a) The period of the validity of a certificate includes main evaluation plus at least four annual surveillance evaluations. This clause refers to the surveillance evaluations.
b) Yes, it is necessary. The re-evaluation is not part of the period of validity of a certificate. It is the start of a new cycle, equivalent to the main evaluation. Therefore, all indicators have to be evaluated during the surveillance evaluations within one cycle.

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| **Code** | INT-STD-20-007_10 (also published under FSC-STD-30-005 with code INT-STD-30-005_01) |
| **Requirement (s)** | Clause 6.3.7. |
| **Publication date** | 31. January 2012 |

**Regarding the internal monitoring of Forest Management Groups, defined in the FSC-STD-30-005, clause 8.1.ii requires that compliance with all requirements of the FSC standard has to be confirmed during the annual internal audit. Clause 8.2 is not clear to me and seems to contradict 8.1. Does the word criteria in 8.2 apply to the criteria of the FSC P&C?**

The FSC-STD-30-005 states:

8.1 The Group entity shall implement a documented monitoring and control system that includes at least the following:
i. Written description of the monitoring and control system;
ii. Regular (at least annual) monitoring visits to a sample of Group members to confirm continued compliance with all the requirements of the applicable Forest Stewardship Standard, and with any additional requirements for membership of the Group.

8.2 The Group entity shall define criteria to be monitored at each internal audit and according to the group characteristics, risk factors and local circumstances.

The Group members shall comply with all FSC applicable requirements, but there is no need to audit all these requirements annually during an internal monitoring or an annual surveillance.

The Group entity may focus its surveillance during a particular annual surveillance evaluation on specific elements of the applicable Forest Stewardship Standard, with the provision that all aspects of the Forest Stewardship Standard are monitored during the period of validity of the certificate.

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| **Code** | INT-STD-20-007_53 |
| **Requirement (s)** | Clause 6.3.7 |
| **Publication date** | 03. December 2018 |

**With the implementation of the National Forest Stewardship Standards (NFSS) based on version 5 of the FSC-STD-01-001 *FSC Principles and Criteria*, the number of criteria to be monitored during the period of validity of the certificate as required by FSC-STD-20-007 Clause 6.3.7 has increased significantly. For a certificate that has one or two surveillances left, it will be difficult to monitor all of them in the remaining period. How should certification bodies proceed in this situation?**

The certification bodies shall make a best attempt to cover the remaining criteria in the remaining period of validity of the certificate.
If this is not feasible and there are just one or two surveillance evaluations left, a risk-based approach shall be taken focusing on the most relevant issues in the management unit. The approach taken shall be justified in the certification report.
In the next certification cycle, the certification body shall monitor all aspects of the Forest Stewardship Standards (NFSS) according to FSC-STD-20-007 Clause 6.3.7.

| Code | INT-STD-20-007_58 |
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| **Requirement (s)** | Clause 6.3.7<br>INT-STD-20-007_49, INT-STD-20-007_53<br>FSC-PRO-60-006 V2-0, Clause 8.3<br>FSC-PRO-60-007 V1-1 Clause 12.2<br>FSC-STD-20-001 V4-0 Clause 4.8.2 |
| **Publication date** | 20. May 2020 |

**a) In a case where there is not a specified transition period indicated in the National Forest Stewardship Standard (NFSS) or Interim National Standard (INS), what should be the deadline to audit against the requirements of the new revised standard?**

The default length of the transition period is one-year after the effective date, as indicated in FSC-PRO-60-006 V2-0, Clause 8.3 and FSC-PRO-60-007 V1-1 Clause 12.2.
The transition period and deadlines to audit against new standards are communicated by FSC International together with the publication and effective date of new national standards. If in doubt, please contact forestmanagement@fsc.org

**b) In case of surveillance audit is performed against the new revised NFSS or INS, shall all the new indicators be assessed before the end of the validity period of the certificate or only the indicators of the mandatory surveillance criteria as per INT-STD-20-007_49?**

The indicators under the mandatory surveillance criteria listed in INT-STD-20-007_49 shall be assessed at each surveillance.

Certification bodies are not required to prioritize the new indicators when conducting surveillance audits against the new revised NFSS or INS, but have to audit them before the end of the certification cycle (see FSC-STD-20-007 Clause 6.3.7). See INT-STD-20-007_ 53 for cases where this is not feasible.

| Code | INT-STD-20-007_49 |
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| Requirement (s) | Clauses 6.3.8. |
| Publication date | 15. June 2018 |

**FSC-STD-20-007 Clause 6.3.8 provides the minimum criteria according to FSC Principles and Criteria V4 whose indicators shall be evaluated at each surveillance evaluation.**
**Which are the equivalent criteria according FSC Principles and Criteria V5-2?**

For the following types of operations, the certification body shall at minimum evaluate at each surveillance all indicators of the following sets of criteria from the applicable Forest Stewardship Standard (according to FSC Principles and Criteria V5-2) in addition to the elements as defined in Clause 6.3.7:

a) Plantations larger than 10 000 ha:
Criteria 1.6; 2.3; 4.4; 4.5; 7.6; 10.2; 10.3; 10.6; 10.7 and 10.12.

b) All non-plantation forest types larger than 50,000 hectares, unless the whole area meets the requirements for classification as a “low intensity managed forest” (see FSC-STD-01-003 SLIMF eligibility criteria)
Criteria 1.4; 1.6; 2.3; 3.2; 3.4; 4.4; 4.5; 5.2; 6.4; 6.6; 7.6; 8.2 and 9.4.

c) FMUs containing high conservation value attributes, unless the whole area meets the requirements for classification as a “small forest” (see FSC-STD-01-003 SLIMF eligibility criteria)
Criteria 6.4; 6.6; 9.4 and 10.3

| Code | INT-STD-20-007_51 |
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| Requirement (s) | Clauses 6.3.8.a |
| Publication date | 15. June 2018 |

**For group certification must all the mandatory criteria (2.3, 4.2, 4.4, 6.7, 6.9, 10.6, 10.7, 10.8) be audited at every surveillance if the total area in the set is >10000 ha, if the set is only comprised of small SLIMF members spread throughout a wide geographical area?**
**Background: we have a large mixed SLIMF / non-SLIMF group. There are only 5 non-SLIMF members, but the plantation SLIMF set comprises 965 members with 13410 ha. The total area of group is 17900 ha.**

Yes. According to Clause 5.3.1: “*The CB shall classify the FMUs included in the scope of the evaluation as sets of ‘like’ FMUs for the purpose of sampling.(...)*”. Once classified in sets of ‘like’ FMUs, the sampling and procedure rules are to be applied.
Therefore, Clause 6.3.8.a is to be applied at the set of ‘like’ FMUs level. In the case described, there would be two sets of ‘like’ FMUs according to the size:
1) 965 SLIMF MU plantation with a total of 13410 ha
2) 5 non-SLIMF MU with a total of 4490 ha
The first set of ‘like’ FMUs would have to be evaluated to be in compliance with the criteria specified in Clause 6.3.8.a.

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| **Code** | INT-STD-20-007_13 |
| **Requirement (s)** | Clauses 6.3.8.b, 5.3.1, 5.3.4 |
| **Publication date** | 27. June 2013 |

**For group certification, does the 50,000 hectare threshold (6.3.8.b) apply at the FMU level or the total area included in the certificate scope?**

**As an example there is a group certificate that contains both SLIMF and non-SLIMF FMUs. The certificate includes 35 FMUs, 20 FMUs are medium sized (1,000-10,000 ha) and 15 are small SLIMF FMUs. The total area in the scope is 50,786 ha and the largest FMU is 8,345 ha. In this case all of the FMUs in the scope of the certificate are small to medium sized. Is the intent of 6.3.8.b really to place the additional cost burden on small and medium enterprises in group certificates associated with the annual evaluation of the specified mandatory criteria?**

According to Clause 5.3.1: "The CB shall classify the FMUs included in the scope of the evaluation as sets of 'like' FMUs for the purpose of sampling.(...)". Once classified in sets of 'like' FMUs, the sampling and procedure rules are to be applied.

Therefore, <u>Clause 6.3.8.b is to be applied at the set of 'like' FMUs level.</u>

In the case described, there would be two sets of 'like' FMUs according to the size:

1) 20 FMUs of medium size (1,000-10,000 ha)
2) 15 small SLMIF FMUs

None of these sets of 'like' FMUs would have to be evaluated to be in compliance with the criteria specified in Clause 6.3.8.b.

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| **Code** | INT-STD-20-007_12 |
| **Requirement (s)** | Sections 7, 5 |
| **Publication date** | 15. May 2012, amended 14. March 2016, amended 12. February 2019 |

**Regarding the change of ownership of a certified Organization to another proprietary under the same certification body, what should the new owner do to keep the certificate?**

If the new owner wants to keep the same certificate, an audit according to the requirements of a surveillance evaluation shall be carried out by the Certification Body. As a precautionary measure this audit shall take place no later than 3 months after the change. The new owner shall be responsible for all pending conditions issued before the change.
In this case, the original expiry date of the certificate is maintained.

If the new owner wants a new certificate with a new five year timeline, a main evaluation according to Clause 5 in FSC-STD-20-007 shall be carried out by the Certification Body.

| Code | INT-STD-20-007_56 |
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| **Requirement (s)** | FSC-STD-20-007 sections 7 and 5<br>INT-STD-20-007_12<br>FSC-PRO-20-003 Sections 2 and 3<br>FSC-STD-20-001 Clause 1.4.6 |
| **Publication date** | 19. June 2019, |

**Is it possible to perform a transfer of certificate from one to several new certificates (and possibly several CBs) without a gap in certification status, in the case when existing certified forest is parted and sold?**

This question combines 2 aspects:

a) A change in scope (ownership and management unit allocation), and
b) A potential transfer of certification to new CBs.

**Scenario A: Change in scope (CB remains the same)**

This case does not constitute a 'transfer' in the sense of FSC-PRO-20-003 V1-0, but a change in scope according to FSC-STD-20-001 V4-0 Clause 1.4.6. Any change in scope needs to be evaluated by the CB and a new certification decision needs to be taken to grant the change.

The requirements regarding the 'change in ownership' are established in INT-STD-20-007_12.

Regarding the changes of the management units (reduced area) it's the prerogative of the CB to decide the measures needed to evaluate this change on a case by case basis.

Based on the results of the change of scope evaluation, a seamless continuation of the certification status may be possible.

**Scenario B: Change in scope and in CB**

This case combines a 'transfer' in the sense of FSC-PRO-20-003 V1-0 AND a change in scope according to FSC-STD-20-001 V4-0 Clause 1.4.6.

The succeeding CB therefore needs to conduct a transfer audit according to FSC-PRO-20-003 V1-0 Clause 3.2.f) in combination with a change in scope evaluation according to requirements outlined in Scenario A (above).

Based on the results of the transfer audit and the change of scope evaluation, a seamless continuation of the certification status may be possible.

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| **Code** | INT-STD-20-007_06 |
| **Requirement (s)** | Clause 8.2 |
| **Publication date** | 08. December 2011 |

**In the introduction to the P&C FSC-STD-01-001 V4-0 it states ’FSC is not about perfection’. Can this be used as justification for auditors not raising Non Conformities?**

No. An imperfection is a non conformity. The rules are set out in FSC-STD-20-007 for issuing certificates whilst there are non conformities and the closing out of such ‘imperfections’ is part of the certification process. Such imperfections then cannot be ignored.

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| **Code** | INT-STD-20-007_57 |
| **Requirement (s)** | FSC-STD-20-007 V3-0 Clause 2.2<br>FSC-STD-20-007 V3-0 Clause 8.1<br>FSC-STD-20-007 V3-0 Clause 8.3 |
| **Publication date** | 24 September 2019 |

**National Forest Stewardship Standards and Interim National Standards may contain indicators that impose conformity requirements related to separate Annexes, such as laws and regulations, list of rare and threatened species, High Conservation Value frameworks etc.**

1) **How shall Certification Bodies (CBs) evaluate these Annexes?**

   All aspects of National Forest Stewardship Standards and Interim National Standards are normative, including the scope, effective date, references, terms and definitions, notes, and the annexes, unless otherwise stated in the NFSS. When an indicator refers to an Annex, the conformity assessment shall cover both the indicator and the corresponding requirements in the Annex, unless the Annex is explicitly categorized as ‘informative’.

2) **At what level shall corrective action requests be issued?**

   Sub-indicators in an Annex contribute to the conformity assessment at criterion level in the same way as sub-indicators listed in an indicator within the main body of the standard. Any corrective action request shall be issued in line with FSC-STD-20-007 V3-0 Clause 8.3.

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| **Code** | INT-STD-20-007_27 |
| **Requirement (s)** | Clause 8.7 |
| **Publication date** | 06. June 2014 |

**Clause 8.7 reads in part, "A non-conformity shall be considered major if, either alone or in combination with further non-conformities, it results in, or is likely to result in a fundamental failure to achieve the objectives of the relevant FSC Criterion."**
**In an FM standard where a criterion only contains one indicator, if a non-conformance is issued against the indicator, should this automatically be graded as a major?**

Non-conformities at the indicator level have to be analyzed and classified as minor or major. A major non-conformity with the one indicator leads to a major non-conformity at the criterion level. A minor non-conformity with the one indicator leads to a minor non-conformity at the criterion level.

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| **Code** | INT-STD-20-007_25 (also published under FSC-STD-20-011 with code INT-STD-20-011_09) |
| **Requirement (s)** | Clause 8.8 |
| **Publication date** | 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.

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| **Code** | INT-STD-20-007_38 |
| **Requirement (s)** | Clause 8.10 |
| **Publication date** | 14. March 2016. Updated in 05. October 2020 to align with INT-STD-20-001 |

**What can be considered "beyond the control" of the responsible forest manager?**

The following situations are considered typical as being beyond the control of the Certificate Body and/ or certificate holder:
- Natural disaster;
- Epidemic;
- Armed conflict;
- Other cases of force majeure at the certificate holder;

New or significantly changed requirements in revised normative document (see Clause 12.3 of FSC-PRO-01-001).
In these situations, the decision whether to extend a Minor CAR for a maximum period of one year lies with the CB. Furthermore, in line with FSC Global Strategy's new approach to community forestry (FSC Global Strategy point 1.1.2), in the case of community managed operations /smallholders, additional exceptional situations (e.g., economic circumstances) may be considered "beyond the control" of the responsible forest manager. In these situations, the decision whether to extend a Minor CAR for one year has to be approved by FSC on a case by case basis.

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| **Code** | INT-STD-20-007_03 |
| **Requirement (s)** | Clause 8.10, 8.11 |
| **Publication date** | 04. July 2008 |

**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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| **Code** | INT-STD-20-007_24 (also published under FSC-STD-20-011 with code INT-STD-20-011_05) |
| **Requirement (s)** | Clause 8.10.1 |
| **Publication date** | 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.

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| **Code** | INT-STD-20-007_33 |
| **Requirement (s)** | Clause 8.11 |
| **Publication date** | 14. November 2014 |

**If a field evaluation is needed to evaluate whether an FM major non-conformity has been corrected, what is be the timeline to perform this evaluation?**

The certification body shall determine whether the corrective action has been appropriately and fully implemented within its designated timeline. In this case, three months.
This may be extended once for a maximum of another three months if full implementation of the corrective action was not possible due to circumstances beyond the control of the responsible forest manager

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| **Code** | INT-STD-20-007_39 |
| **Requirement (s)** | Clause 8.15 |
| **Publication date** | 11. May 2016 |

**a) Is there a threshold number of minor CARs which prevent a certificate from being issued?**
**b) If not, how is Clause 8.15 interpreted?**
**c) Does PSU have any opinion on what approach should be used to ensure consistency?**
**d) What is a "large number"?**

a) No, there is no generic threshold number of minor CARs which prevent a certificate from being issued. The number of minor CARs constituting a major failure need to be assessed based on the extent to which different elements of the criterion have been complied with.
b) See above our response to point a.
c) PSU is not restricting the operations of the CBs. They may have different means for assessing the conformity with the criterion.
d) See above our response to point a.

| | |
|---|---|
| **Code** | INT-STD-20-007_21 |
| **Requirement (s)** | Clause 8.13 |
| **Publication date** | 18. February 2014 |

**Is it allowed to reclassify the grade of a non-conformity from major to minor prior to the issuance of an initial FSC FM certificate?**
**Example: During the pre-evaluation of a forest organization a major non-conformity is identified. During the subsequent main assessment the audit finds that the major non-conformity is still present. During follow-up non-conformance evaluation audit prior to certificate issuance, the audit finds that the organization has implemented sufficient corrective actions such that the non-conformity is no longer considered a major non- conformity, but rather minor gaps are still present that meet the criteria of a minor non-conformity. In this situation, can the initial major non-conformity identified in the assessment be reclassified to a minor and a certificate issued?**

As long as a major CAR has not been established by formal decision making process, non-conformities that are addressed in the audit process can be regraded, either to minor to major as major to minor. This does not qualify as a downgrading in the sense of our requirements.
Once a major CAR has been formally established, downgrading is no longer possible.

| Code | INT-STD-20-007_59 |
|---|---|
| Requirement (s) | Clause 8.19 |
| Publication date | 2. June 2021 |

**How to distinguish between “member failure” and “group failure” connected to the forestry contractor's performance in a forest management group?**

The non-conformity related to a forestry contractor’s performance is considered to be a “member failure”, if the group entity has fulfilled all related responsibilities regarding administration, management planning, training, monitoring, quality control etc. as specified in FSC-STD-30-005 V2-0 *Forest Management Groups*. If the group entity has failed to conform with FSC-STD-30-005, it constitutes a “group failure”.

Examples:

1. The certification body identifies during an evaluation that there is a non-conformity related to the lack of use of personal protective equipment (PPE) by a forestry contractor in the group. Two of the possible scenarios that could happen are:
    a. The forestry contractor knows about the requirement to wear PPE but has intentionally not conformed with the requirement. In this case, the non-conformity would be issued to the forestry contractor and it would be a ‘member/contractor failure’.
    b. The group entity has not informed the forestry contractor about the requirement to use the PPE. In this case, the non-conformity would be issued to the group entity and would be a ‘group failure’.
2. The certification body identifies during an evaluation that there is a non-conformity related to the lack of preservation of an endangered species´ habitat within a management unit during the harvesting operations, which are being implemented by a forestry contractor in the group. Two of the possible scenarios that could happen are:
    a. The forestry contractor knows about the requirement to preserve the endangered species´ habitat when harvesting; the forestry contractor also knows about the presence of such habitat. However, the forestry contractor has intentionally not conformed with the requirement. In this case, the non-conformity would be issued to the forestry contractor and it would be a ‘member/contractor failure’.
    b. The forestry contractor knows about the requirement to preserve the endangered species´ habitat when harvesting; the forestry contractor has not been informed about the presence of such habitat in the management unit. In this case, the root cause for the non-conformity is the lack of planning and information to the forestry contractor, so it would be issued to the group entity and it would be a ‘group failure’.

| Code | INT-STD-20-007_01 |
|---|---|
| **Requirement (s)** | Clause 8.20 |
| **Publication date** | 04. July 2008 |

**Does Clause 8.20 cover situations where a forest owner/manager claims that compliance with FSC requirements is not possible because of allegedly dysfunctional legislation?**

Yes, but in this case the forest owner/manager shall support the evaluation by the certification body with a written legal opinion by an independent legally recognized attorney-at-law. This evaluation shall further include the FSC International Center and the FSC National/Regional Office. If a legal opinion cannot be provided, the non-compliance shall be treated as usual; see FSC-STD-20-007 V3-0 Section 8.

| Code | INT-STD-20-007_41 |
|---|---|
| **Requirement (s)** | Clause 8.20 |
| **Publication date** | 01. July 2016 |

**Should certification bodies (CB) issue a major Corrective Action Request (CAR) to certificate holders (CH) when the irresolvable conflict between the applicable standard and national legislation causes a nonconformity with one or more requirements in the standard?**

When a conflict is established between FSC certification requirements and national legislation that prevents the CH from fulfilling one or more requirements of the applicable standard, CBs shall attempt to resolve the conflict between the affected parties and including National Offices or Standards Development Groups, where they exist. CBs should involve the FSC Policy and Standards Unit as deemed appropriate. If the conflict cannot be resolved, and the nonconformity with the requirement(s) results in, or is likely to result in a fundamental failure, then CBs shall issue a major CAR.

| Code | INT-STD-20-007_42 |
|---|---|
| **Requirement (s)** | Annex 1. |
| **Publication date** | 16. November 2016 |

**Do we need to use Annex 1 of FSC-STD-20-007 v3 for auditing multiple FMUs?**

No, Clause 5.3.2 states that Annex 1 shall be used for sampling of groups. Sampling of multiple FMUs at Main Assessment shall be based on formula X= 0.8 * □y (y= all FMUs in the scope of certification). Surveillance evaluation of multiple FMUs must be conducted according to clause 6.3.6.

| Code | INT-STD-20-007_43 |
|---|---|
| **Requirement (s)** | Annex 1. Section 3 |
| **Publication date** | 24.January 2018 |

**What is the sampling requirement for low intensity managed Management Units (MU) in group certification?**

The intensity of the forest operations does not affect sampling requirements. Certification bodies shall classify the MUs as sets of like MUs as described in clause 5.3.1 and the sampling formulas in Annex 1 for the corresponding sizes will be applied.

## FSC-STD-20-007 (V4-0) FOREST MANAGEMENT EVALUATIONS

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|---|---|
| **Code** | INT-FSC-STD-20-007_65 |
| **Requirement (s)** | Scope, Clauses 8.2.1 and 8.2.2 |
| **Publication date** | 16. November 2023 |

**Can two types of management units of the same forest owner (e.g., the state) be certified under a single certification with multiple management unit, even if two different types of managerial control over these MUs exist (e.g., State Forest Service and Ministry of Environment)?**

Yes, management units belonging to the same forest owner, but having different management objectives and different managerial bodies, may be certified under a single legal entity managing multiple management units, provided that the legal entity acts as The Organization and assumes the overall responsibility of The Organization as defined in the section 5. Responsibility for Compliance in <FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship>.

| | |
|---|---|
| **Code** | INT-FSC-STD-20-007_64 (also published under FSC-STD-60-002 with code INT-FSC-STD-60-002_02) |
| **Requirement (s)** | Clause 8.2 |
| **Publication date** | 09. October 2023 |

**Can an approved and published Forest Stewardship Standard be used for evaluation prior to its effective date?**

Yes, an approved and published Forest Stewardship Standard can be used for evaluation after its publication date and prior to the effective date provided both The Organization and the certification body mutually agree to it.
However, attestation of certification shall be issued after the effective date.

| Code | INT-FSC-STD-20-007_67 |
| --- | --- |
| **Requirement (s)** | Clause 17.1 |
| **Publication date** | 29. February 2024 |

**For various reasons, all data required for completing the evaluation report may not be available to the certification body. Does such situation constitute a non-conformity to the certificate holder, or to the certification body? If so, which clause or indicator is applicable?**

Failure in providing data to the certification body, which is required for demonstrating conformity with an indicator in the Forest Stewardship Standard (FSS) and other applicable normative documents constitutes non-conformity to the certificate holder.

Failure in completing the evaluation report with the information provided by the certificate holder and any additional information required by FSC-STD-20-007, Annex 4 constitutes a non-conformity to the certification body according to Clause 17.1 in FSC-STD-20-007 V4-0.

Note: As per FSC-STD-20-001 V4-0, the certification agreement requires the client to:

- conform with any conditions set by the certification body for granting or maintaining certification (Clause 1.2.3 b).
- agree, that the certification body, FSC and ASI have the right to access confidential information, examine documentation deemed necessary, and access to the relevant equipment, location(s), area(s), personnel, and bodies providing outsourced services to clients (Clause 1.2.3 q).

| Code | INT-STD-20-007_63 (Also published in Ecosystem Interpretations under code INT-PRO-30-006_06) |
| --- | --- |
| **Requirement (s)** | FSC-STD-20-007 V4-0 Clause 18.1<br>FSC-STD-20-007a Clause 2.2<br>FSC-STD-20-007b Clause 2.1<br>FSC-STD-20-012 V1-1 Clauses 10.13.1 and 10.11.2<br>FSC-STD-20-011 Clause 12.3, 13.4 a)<br>FSC-PRO-30-006 Clause 1.5.1 |
| **Publication date** | 27. February 2023 |

**As French will be included as a new official language of FSC as result of Motion 01/2020 *Addition of French as FSC's Third Official Language* passing at the 9th FSC General Assembly, until the change in the FSC Statutes is made and becomes effective, are certification bodies allowed not to translate the evaluation reports and public summaries of evaluation reports into English or Spanish, when the report is available in French?**

Yes, FSC will be including French as an official language into its Statutes at the earliest convenience. Until then, certification bodies may already submit forest management, chain of custody and controlled wood evaluation reports and/or public summaries, and Ecosystem Services Certification Documents in French.

| Code | INT-FSC-STD-20-007_68 |
|---|---|
| Requirement (s) | Annex 4. Table 8. Information element 20, subsection e<br>ADVICE-20-007-20 Implementation of FM digital reporting |
| Publication date | 01. January 2025 |

**The FM Digital Audit Reporting (DAR) template requires the entry of the forest zone (tropical, subtropical, temperate, boreal) in Section 7.02. To ensure consistent reporting by certification bodies, how does FSC define these zones?**

FSC does not have its own definition of forest zones (also referred to as climatic domains). For the purpose of the evaluation report, FSC is adopting the definitions of the Food and Agriculture Organization (FAO) published in the Global Ecological Zone (GEZ) framework outlined in Part 1a of the Terms and Definitions for the 2025 Global Forest Resources Assessments.
For the evaluation report, certification bodies shall follow the definitions provided in the Table of page 9 in Part 1a, under ‘Climatic Domain’, but only to the EZ Level1 (Domain).

Sources:
FAO, 2023. “Terms and Definitions - FRA 2025.” Forest Resources Assessment (FRA) Working Paper 194. Rome, Italy: Food and Agriculture Organization of the United Nations.

GIS data of the GEZ map are available at:
http://foris.fao.org/static/data/fra2010/ecozones2010.jpg

| Code | INT-FSC-STD-20-007_66 |
|---|---|
| Requirement (s) | Annex 4. Table 8. Information element 65 |
| Publication date | 11. January 2024 |

**Are non-conformities required to be presented in the public summary?**

Yes, a list of any conditions and subsequent actions taken by The Organization to correct non-conformities is required to be included in the public summary report.
This shall include the description of the major or minor non-conformities identified to which the conditions are related.

## FSC-STD-20-007a (V1-0) FOREST MANAGEMENT EVALUATIONS ADDENDUM – FOREST CERTIFICATION REPORTS

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|---|---|
| **Code** | INT-STD-20-007a_03 |
| **Requirement (s)** | FSC-STD-20-007a (V1-0) Box 1, Clause 1.1.0;<br>Also relevant for FSC-STD-20-007b (V1-0) Box 1, Clause 1.3.9. |
| **Publication date** | 03. April 2020 |

**Are rights-of-ways that are located on a certified Management Unit (MU) subject to FSC pesticide reporting requirements? Does the situation change if the easement areas are excised from the scope of the certificate?**

Yes, a right-of-way or other easement that is located within the boundaries of a certified MU is subject to FSC pesticide reporting. The names and quantities of pesticides applied, and size of area treated must be included in the certificate holder's certification report summary of quantitative pesticides data. If the areas are excised from the scope of the certificate following FSC-POL-20-003, then the certificate holder is not required to report pesticide application in these areas.

NOTE: An easement is the right to use another person's land for a stated purpose. It can involve a general area of the property or a specific portion. A right-of-way is a type of easement that gives someone the right to travel across property owned by someone else.

| | |
|---|---|
| **Code** | INT-STD-20-007a_05 |
| **Requirement (s)** | Box 1, Clause 1.1. r) |
| **Publication date** | 09. October 2023 |

**Field 7.13 of Digital Audit Report template (replanted forest area) is defined as the area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems, which corresponds to Box 1, 1.1. r) in FSC-STD-20-007a.**
**Does Box 1, 1.1. r) in FSC-STD-20-007a V1-0 require to report replanted areas only for natural / semi-natural forests or does it refer to any kind of forest where artificial regeneration is applied, including plantations?**

Requirements in Box 1, 1.1. r) in FSC-STD-20-007a V1-0 refer to the area in the production forest (i.e. forest from which timber may be harvested) regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems. Production forest may be natural forest, semi-natural forest, or a plantation.

| Code | INT-STD-20-007a_02 |
| --- | --- |
| **Requirement (s)** | Box 1 Clause 3.3.5; Box 2 Clause 1.2.6 |
| **Publication date** | 22. May 2019 |

**FSC-STD-20-007a Box 1 Clause 3.3.5 states that the certification report shall contain ‘’*Consultation with stakeholders including a list of institutions/individuals informed about the evaluation and a list of individuals who were interviewed by auditors or who contributed information in writing*”**

**Does this mean that the certification report has to contain the names of individuals?**

No, personal data (including names of individuals) are not required to be stated in the certification report (nor in the public summary report) and would in any case require prior and informed consent of the stakeholder.

It is only required to include a general description of the stakeholder who was interviewed or who shared information with the auditors in writing, such as “forest worker”; “employee of a contractor”; “inhabitant of a community adjacent to the FMU”; “representative from the local administration”.

Where the identification of individuals is deemed necessary to follow up on communication with the stakeholder, the certification body may record personal data for internal use, but only upon prior and informed consent of the stakeholder.

Certification reports and public summary reports shall not violate applicable data protection legislation.

| Code | INT-STD-20-007a_04 |
| --- | --- |
| **Requirement (s)** | Box 1 Clause 4.2; |
| **Publication date** | 03. July 2023 |

**a) Can the reporting requirements of FSC-STD-20-007a, Box 1, 4.2 be implemented on the Resource Management Unit (RMU) instead of Management Unit (MU) level?**
**b) Can the evaluation and reporting requirements of FSC-STD-20-007a, Box 1, 4.2 be implemented for sets of small and low intensity managed forests (SLIMF) MUs in the case of a mixed SLIMF and non SLIMF group?**

a) No, the purpose of RMU is sampling, not reporting. Reporting has to be based on individual MUs except for the case stated in Box1, Clause 4.2 (FSC-STD-20-007 V3-0) and Annex 4, Clause 62 (FSC-STD-20-007 V4-0).
b) No, FSC-STD-20-007a, Box 1, clause 4.2 states that observations shall be presented separately for each MU evaluated in the case of group evaluations, unless all the MUs within the scope of the certificate meet the eligibility criteria as SLIMFs.

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|---|---|
| **Code** | INT-STD-20-007a_01 |
| **Requirement (s)** | Clause 6.4 |
| **Publication date** | 11. May 2016 |

**Does EVERY sampled group member (non-SLIMF) HAVE to be assessed in surveillance for compliance with EVERY Criterion/Indicator audited during an annual assessment?**

Not every sampled group member (non-SLIMF) has to be assessed in surveillance for compliance with EVERY Criterion/Indicator audited during an annual assessment with the exception of those Criteria/Indicators mentioned in Clause 6.3.8 of FSC-STD-20-007 V3-0.

# FSC-STD-20-007b (V1-0) FOREST MANAGEMENT EVALUATIONS ADDENDUM – FOREST CERTIFICATION PUBLIC SUMMARY REPORTS

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|---|---|
| **Code** | INT-STD-20-007b_05 |
| **Requirement (s)** | Clause 3.1 and 3.2 |
| **Publication date** | 03. April 2020 |

**Shall the forest certification public summary reports and their annual updates remain in FSC data base and not be removed at next certification cycle, or in case of suspension of certificate holder?**

Yes. The forest certification public summary reports and their annual updates shall remain in FSC data base and shall not be removed at next certification cycle, or in case of suspension of the certificate holder.

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|---|---|
| **Code** | INT-STD-20-007b_03 |
| **Requirement (s)** | Clause 3.2 |
| **Publication date** | 14. March 2016 |

**Is the deadline of ninety (90) days also valid for required translations into an official FSC language?**

Translations shall be published no later than thirty (30) days after the publication of the annual updates.

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|---|---|
| **Code** | INT-STD-20-007b_04 |
| **Requirement (s)** | Clause 3.2 and clause 8.1 |
| **Publication date** | 8. June 2017 |

**We do on-site closing meeting usually two weeks after the last day in field. Shall updates of the public summary report be made publicly available on the FSC database of registered certificates (www.fsc-info.org) ninety (90) days after the on-site closing meeting as per FSC-STD-20-007b Clause 3.2 or ninety (90) days after the last field day as per Clause 8.1?**

The intention and requirements in both clauses are the same: the closing meeting is part of the audit process and usually takes place on the last field day. In this regard, given the intent of both requirements, the ninety (90) days timeline commences on the last field day of the audit, regardless of when the certification body holds the closing meeting.

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|---|---|
| **Code** | INT-STD-20-007b_02 |
| **Requirement (s)** | Clause 7.3 |
| **Publication date** | 07. October 2014 |

**Entering SLIMF members in the FSC database is optional and in some countries national legal restrictions do not allow publication of contact data or geographical data.**
**However, any buyer of certified products will have to verify, that the invoicing group member is currently certified under the group scheme. This can only be done if respective reference is given in the database entry of the group.**
**How shall buyers verify the certified status of a SLIMF group member to accept the timber as verified (ref. to FSC-STD-40-004) if the name of the supplier is not published in the FSC database?**

The buyer shall contact the Group entity to confirm that the supplier is a member of the group and has not been suspended or withdrawn. The contact details of the Group entity can be found in the FSC Certificate Database.

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|---|---|
| **Code** | INT-STD-20-007b_01 |
| **Requirement (s)** | Clause 7.3 |
| **Publication date** | 06. June 2014 |

**a) SLIMFs group members are excluded from the requirement to provide an up-to-date list of group members in the public summary report. Are certification bodies (CBs) required to enter group member information for SLIMF FMUs into the FSC database for group members that only have SLIMF FMUs?**
**b) Is it acceptable to upload an attachment to the database for very long lists of group members vs. making entry of each individual?**

a) Entering SLIMF members in the FSC database is optional. However, we encourage including this information for transparency, to inform which forests are certified and to allow stakeholders to provide comments, unless national legal restrictions do not allow publication of this kind of information
b) Yes, it is acceptable to provide the information on FM group members as an attachment to the database entry.

| Code | INT-STD-20-007b_06 |
| --- | --- |
| **Requirement(s)** | Clause 7.3<br>FSC-STD-30-005 V2-0 Chapter 19<br>INT-STD-20-007b_02 |
| **Publication date** | 24. June 2021, updated on 14 July 2021 |

**Entering the names of forestry contractors that are included into the scope of FM/CoC group certificate is not explicitly required in the FSC-STD-20-007b. How shall buyers verify the certified status of a forestry contractor to accept the material as certified, if the name of the supplier is not published in the FSC database?**

Certification bodies shall include an up-to-date list of all forestry contractors included in the scope of the certificate in the public summary report, including, for each contractor: Name and contact details.

Certification bodies shall record contractors' details in the FSC database in the same way they record member information.

## FSC-STD-20-012 (V2-0) CONTROLLED FOREST MANAGEMENT EVALUATIONS

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|---|---|
| **Code** | INT-STD-20-012_01 (also published with code INT-POL-01-007_01, INT-STD-30-010_01 and INT-PRO-01-007_01) |
| **Requirement (s)** | FSC-STD-20-012 V2-0 Definitions<br>FSC-POL-01-007 V1-0 Scope<br>FSC-STD-30-010 V3-0 Transition end date, Scope, indicators 54.2.2 and 54.2.3.<br>FSC-PRO-01-007 V1-0 Chapter 3, Sections 2, 18, 24, 25, Clauses 17.4.a; 17.4.d.i and Annex 5 |
| **Publication date** | 09. September 2024 |

**a) Which remedy actions is the CW/FM producer certified against <FSC-STD-30-010 V2-0 FSC Controlled Wood Standard for Forest Management Enterprises> required to complete for the past conversions, based on the indicators 54.2.2 and 54.2.3 in <FSC-STD-30-010 V3-0 Controlled Forest Management> and on the requirements in <FSC-PRO-01-007 Remedy Framework>,**

**iii. before the transition end date (31 Dec 2025) of V3-0 of <FSC-STD-30-010 Controlled Forest Management>; and**

**iv. before the step-up evaluation (see the definition in <FSC-STD-20-012 Controlled Forest Management Evaluations>)?**

**b) Is a CW/FM producer, which has converted natural forests to plantations between 1 December 1994 and 31 December 2020 required to restore these planted areas in a 1:1 ratio back to the natural forest?**

a) The CW/FM producer which has converted natural forest in the past and is subject to the indicators 54.2.2 or 54.2.3 of <FSC-STD-30-010 V3-0 Controlled Forest Management>, shall:

iii. contact the Alternative Dispute Resolution & Remedy Team at FSC International at remedy@fsc.org and enter into an agreement with FSC in conformity with Chapter 3, Section 2 of the <FSC-PRO-01-007 Remedy Framework> before the end of the transition period of 31 Dec 2025, and

iv. have an approved Remedy Plan in accordance with Chapter 3, Sections 24 and 25 of <FSC-PRO-01-007 FSC Remedy Framework> in place. The remedy process shall have reached the Initial Implementation Threshold for the environmental and social remedy during the 5-year CFM certification period, before the producer is eligible for entering the step-up evaluation for the full forest management certification.

NOTE: The CW producer which was not involved in conversion but which has acquired Management Units where conversion has taken place between 1 December 1994 and 31 December 2020, shall demonstrate restitution of priority social harms and partial remedy of environmental harms in conformity with the indicator 54.2.3 in <FSC-STD-30-010 V3-0 Controlled Forest Management>, unless the acquirement was completed by a CW/FM certificate holder before the effective date of <FSC-POL-01-007 V1-0 Policy to Address Conversion> (1 July 2023), as specified in the scope of that policy.

b) Yes, in the case where the CW/FM producer has converted natural forests to plantations according to indicator 54.2.2 in <FSC-STD-30-010 V3-0 Controlled Forest Management> the remedy action shall be proportionate (1:1) to the size of the converted area and equivalent to the nature of environmental harm caused by the conversion, as

stated in the Chapter 3, Clause 17.4.d.i of the <FSC-PRO-01-007 FSC Remedy Framework>.

- The selection of the remedy site is specified in the Chapter 3, Clause 17.4a of the <FSC-PRO-01-007 FSC Remedy Framework>, stating that the first priority for the selection is the actual site of conversion.

The remedy action may be either restoration, or conservation as indicated in Chapter 3, Section 18 of the <FSC-PRO-01-007 FSC Remedy Framework>.

## FSC-STD-30-005 (V1-1) FSC STANDARD FOR GROUP ENTITIES IN FOREST MANAGEMENT GROUPS

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|---|---|
| **Code** | INT-STD-30-005_10 |
| **Requirement (s)** | A. Scope |
| **Publication date** | 22 May 2019 |

**Under FSC-STD-30-005, is it possible to have a group entity that manages both, units managed under FSC-STD-30-010 (CW for FM enterprises) and units managed under a full FSC FM standard?**

<u>Scenario 1: General considerations of CW in group management</u>

Is it possible to manage CW groups under the requirements of FSC-STD-30-005 V1.1 and under FSC-STD-30-010 V2.0 (FSC Controlled Wood Standard for Forest Management Enterprises)?

Yes, in general, the management of CW groups under FSC-STD 30-005 V1.1 is possible, as it is not explicitly excluded from the scope of group management and there is no other normative document addressing this issue.

<u>Scenario 2: One group management system (group entity) managing a CW group and a FM group separately</u>

Is it possible that one group management system ("group entity") manages a pure CW group and a pure FM group separately?

No, it may be the same legal entity but it cannot be the same group entity (one group entity would be for the CW group and another group entity for the full FM group). This is to say, it can be the same legal entity but formally they operate as two group entities.

<u>Scenario 3: Managing a mixed FM-CW group under one group entity</u>

Is it possible that a group entity manages a mixed FM-CW group?
No, the group members have to be organized in two separated groups and have separate management systems, separate certificates and conform with the respective standard requirements in the applicable CW and FM standards

| Code | INT-STD-30-005_08 (also published with code INT-STD-20-007_44) |
|---|---|
| **Requirement (s)** | D. Terms and definitions |
| **Publication date** | 22. January 2018 |

**FSC-STD-30-005 introduce concept 'landscape level requirements' (*requirements of the applicable Forest Stewardship Standard that are implemented at the level of the group entity in a forest management group (e.g. protection of representative samples of ecosystems, protection of high conservation values)*), and a note in FSC-STD-20-007 Clause 5.3.5 says: '*Responsibilities for meeting the applicable criteria shall not be 'traded' between different members*'**
**These two standard clauses seem to be contradictory.**

**a) Can set-aside areas be shared between members in a group?**

**b) What happen if a member decides to leave the group and join another group if that member constitute a large part of the common set-aside area?**

**c) What happens if the member is a member in several groups?**

a) As a general rule, each group member shall comply with the requirement of maintaining set-aside areas, in each Management Unit.
Only in the case of SLIMF groups, set-aside requirements can be met at the entity level provided that the group has established such division of responsibilities in the management system between the group entity and the group members.
SLIMFs below 50 ha can meet set-aside requirements outside the group, provided that the requirements in INT-STD-01-001_09 are met.

b) The group has to constitute new set-aside area(s) to remain in conformity with the set-aside area requirements. A shift to new areas needs to be evaluated and approved by the certification body.

c) A group member (forest owner or forest manager who participates in a group scheme) can belong to different Group entities). However, not with the same Management Unit (as per Clause 4.1.10 in 20-001 FSC-STD-20-001 V4-0). Therefore, in this context this scenario would be irrelevant.

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|---|---|
| **Code** | INT-STD-30-005_04 (also published under FSC-STD-20-007 with code INT-STD-20-007_17) |
| **Requirement (s)** | Part 1 |
| **Publication date** | 28. November 2013 |

**Regarding to special or adapted requirements for Type II groups:**

**1. Can CBs certify RMUs as single FMU certificate?**
**2. If 30-005 is applicable, which are the requirements for RMUs (group entity but also group members) if group members have almost no rights and responsibilities?**

1. No, the RMU can be used as the basis for sampling as if it were a single FMU certificate, but it has to comply with the rest of requirements for groups and be certified as a group.

2. RMUs shall comply with all the applicable requirements in FSC-STD-30-005 (V1-0).

| | |
|---|---|
| **Code** | INT-STD-30-005_06 |
| **Requirement (s)** | Clause 1.1 |
| **Publication date** | 06. October 2014 |

**Is it possible that two independent legal entities serve as Group entity (having equal rights, having signed the contract for certification jointly and both having signed a Trademark License Agreement)?**

No, the Group entity shall be one independent legal entity or an individual acting as a legal entity.

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| **Code** | INT-STD-30-005_03 |
| **Requirement (s)** | Clause 2.1 |
| **Publication date** | 26. August 2013 |

**Can CBs evaluate quantitative requirements related to landscape level requirements (i.e. requirement to maintain certain percentage of forest area as strict reserves) at the level of sets of like FMUs in the case of SLIMF groups comprised of very small FMUs?**

Yes, as long as the group has established such division of responsibilities in the management system between the group entity and the group members.

The evaluation shall be carried out by the certification body according to the management system of the group. In this case, if the group has agreed that complying with the requirement of maintaining set-aside areas will be the responsibility of the group entity, it shall be evaluated accordingly, this is, at the group entity level (or level of sets of like FMUs).

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| **Code** | INT-STD-30-005_15 |
| **Requirement (s)** | Clauses 2.1, 2.1.1, 2.1.2 and 9.1.a) |
| **Publication date** | 6 May 2022 |

**Can a Village Committee in China be treated as a Forest management group member - instead of individual farmers, villagers or households, for the evaluation against the applicable requirements of FSC-STD-30-005?**

Yes, a Village Committee in China can be treated as a Forest management group member instead of individual farmers, villagers or households, if the Village Committee has been formally registered by Group Entity to represent individual farmers or villagers in accordance with the Group rules.

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| **Code** | INT-STD-30-005_07 |
| **Requirement (s)** | Clauses 3.1, 3.4 |
| **Publication date** | 05. October 2015 |

**a) A FM Group member does conversion of forest to non-forest land and the membership is correctly terminated by the Group entity because this kind of conversion is not allowed in FSC. After some time the forest owner seeks FSC-certification in another Group. The previously converted area is now a quarry area and non-forest land in their forestry plan. Is it acceptable to rejoin certification after this kind of land conversion?**

**b) If a Group certification agreement is terminated by the Group entity by whatever reason, and the forest owner wants to join another Group. Is it totally up to the new group entity to evaluate the forest owner or are there some time limits or other requirements that makes it impossible to rejoin a new group?**

a) If the converted area was larger than 10% or 10.000 ha of the forest areas under the Organization's responsibility in the past 5 years or affecting HCVFs, this would be considered a violation of the Policy for Association.
The described situation suggest a lack of commitment of this forest owner with the FSC Principles and Criteria. According to criterion 1.6 (P&C V4), the CB shall ensure that Forest managers demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.

b) According to FSC-STD-30-005, clause 3.4, the Group entity or the certification body shall evaluate every applicant for membership of the Group and ensure that there are no major nonconformities with applicable requirements of the Forest Stewardship Standard, and with any additional requirements for membership of the Group, prior to being granted membership of the Group. There are no further restrictions or timelines to be considered.

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| **Code** | INT-STD-30-005_09 (also published with code INT-STD-20-007_52) |
| **Requirement (s)** | Clause 3.4 |
| **Publication date** | 02. August 2018 |

**According to the sampling rules for new Management Units (MU) which have been added to the scope of certificate since the last evaluation, new MUs shall be sampled at the rate of a main evaluation (see also interpretations INT-STD-20-007_16, INT-STD-20-007_22 and INT-STD-20-007_48).**
**Shall certification bodies evaluate the new MUs against all applicable requirements of the applicable Forest Stewardship Standard?**

In the case of group certification, the certification body or the group entity shall evaluate every applicant for membership of the group and ensure that there are no major nonconformities with applicable requirements of the Forest Stewardship Standard, and with any additional requirements for membership of the group, prior to being granted membership of the group.
NOTE: for applicants complying with SLIMF eligibility criteria for size, the initial evaluation may be done through a desk audit.

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| **Code** | INT-STD-30-005_02 |
| **Requirement (s)** | Clause 4.2 |
| **Publication date** | 10. April 2012 |

**In FM Groups, where a Resource Manager is managing part or one of several properties owned by an owner, is the owner (group member) required to make a commitment to adhere to the FSC P&C or comply with the Policy for Association on land which is outside the Resource Manager's management and outside the scope of the certificate? Note the Resource Manager signs the TLA, not the owners.**

Yes, the owner (group member) is required to make a commitment to comply with all applicable certification requirements.

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| **Code** | INT-STD-30-005_11 |
| **Requirement (s)** | Clause 4.2 |
| **Publication date** | 10. July 2019 |

**Can different management units (MUs) with different ownership form a group member?**

No, each individual forest owner is considered a group member, but different MUs with different ownership can be represented by the same resource manager.

Note: sampling and auditing of groups including different size classes and Resource Management Units (RMUs) is prescribed in FSC-STD-20-007 (V3-0) Annex 1.

| Code | INT-STD-30-005_01 (also published under FSC-STD-20-007 with code INT-STD-20-007_10) |
|---|---|
| **Requirement (s)** | Clauses 8.1, 8.2, 6.3.7 |
| **Publication date** | 31. January 2012 |

**Regarding the internal monitoring of Forest Management Groups, defined in the FSC-STD-30-005, clause 8.1.ii requires that compliance with all requirements of the FSC standard has to be confirmed during the annual internal audit. Clause 8.2 is not clear to me and seems to contradict 8.1. Does the word criteria in 8.2 apply to the criteria of the FSC P&C?**

The FSC-STD-30-005 states:

8.1 The Group entity shall implement a documented monitoring and control system that includes at least the following:
i. Written description of the monitoring and control system;
ii. Regular (at least annual) monitoring visits to a sample of Group members to confirm continued compliance with all the requirements of the applicable Forest Stewardship Standard, and with any additional requirements for membership of the Group.

8.2 The Group entity shall define criteria to be monitored at each internal audit and according to the group characteristics, risk factors and local circumstances.

The Group members shall comply with all FSC applicable requirements, but there is no need to audit all these requirements annually during an internal monitoring or an annual surveillance.

The Group entity may focus its surveillance during a particular annual surveillance evaluation on specific elements of the applicable Forest Stewardship Standard, with the provision that all aspects of the Forest Stewardship Standard are monitored during the period of validity of the certificate.

| Code | INT-STD-30-005_12 |
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| **Requirement (s)** | FSC-STD-30-005 V1-1, Section D definitions, Clause 8.3 |
| **Publication date** | 10. July 2019 |

**Can a group scheme, where responsibilities for conformance to standard requirements are differentiated depending on who performs the forestry activity, be considered a type II group?**

No, a group with a differentiation of responsibilities is considered a Type I group. Only when a Resource Manager has the overall responsibility for ensuring conformity with the applicable Forest Stewardship Standard, a group can be considered Type II.

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| **Code** | INT-STD-30-005_05 (also published in FSC-STD-30-005 with code INT-STD-20-007_23) |
| **Requirement (s)** | Clauses 8.4, 8.5 |
| **Publication date** | 19. February 2014 |

**a) There are contradictory definitions for stratification of group members according to size:**
**FSC-STD-30-005 Clause 8.3 requests the group entity to separate between large members above 1000 ha and small members below 1000 ha.**
**At the same time, according to Clause 8.4, the group entity shall use the same stratification the certification body (CB) but FSC-STD-20-007 identifies four different size classes for stratification.**

**b) There is a problem with indicator 8.4 and 8.5 of FSC-STD-30-005: they request the group entity to do an internal monitoring of members different to the external monitoring. If there is only one member in one size class this is not possible and a sampling does not result in a sample, but in one member every year.**

**c) In addition for FMU < 100 ha, which consequently have the lowest risk, the audit intensity would be significantly higher than for larger forests.**

a) There is no contradiction. Clause 8.4 states that for monitoring purposes the group entity should use the same stratification into sets of 'like' FMUs as defined by the CB in their evaluation. Should indicates advice, it is not mandatory.
However, compliance with the requirements in FSC-STD-30-005 and FSC-STD-20-007 is possible following these steps:

1. Separating the members above and below 1000 ha.

2. Doing a further division of each group between <100 ha and 100 – 1000 ha (for members below 1000 ha) and between 1000 – 10000 ha and >10000 ha (for members >1000 ha.)

b) Clause 8.5 states that the group entity should visit different members in their annual monitoring than the ones selected for evaluation by the CB (…). Should is a recommended way, not a requirement if it is not possible because there is one member per class. If there are alternatives the group entity should not visit the same members.
c) FSC-STD-20-007 Clause 6.3.3 provides with specific sampling rules for groups or sub-groups of SLIMFs with less than 100 members that comply with the clause.

## FSC-STD-30-005 (V2-0) FSC STANDARD FOR GROUP ENTITIES IN FOREST MANAGEMENT GROUPS

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| **Code** | INT-STD-30-005_16 |
| **Requirement (s)** | B Scope |
| **Publication date** | 07. November 2022 |

**The Forest Management Groups Standard does not specify the minimum number of members required to constitute a group. Is a forest management group, which constitutes of only one group member, eligible for FSC certification according to FSC-STD-30-005? For example, in the event of a client wishing to establish a group, they may commence with only one group member with the intention of adding further members once certification has been obtained.**

Yes, a forest management group, which constitutes of only one group member, is eligible for FSC group certification as long as the requirements in FSC-STD-30-005 are met by the group entity
This should usually be a temporary situation and the group should intend to add further members.

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| **Code** | INT-STD-30-005_18 |
| **Requirement (s)** | Clause 3.3 – Note 2 and Clause 11.1 |
| **Publication date** | 16. March 2023 |

**a) Is grouping of small and low intensity managed forest (SLIMF) group members into a Resource Management Unit (RMU) mandatory, in cases when the definition of RMU is applicable?**
**b) Can a certification body agree with the group entity that a member is treated as separate management units, although the group entity has assumed the responsibility to ensure conformity in its group management system in line with clause 11.1 of FSC-STD-30-005?**

a) No, the decision whether to group management units (MUs) into Resource Management Units (RMUs) or not, rests with the group entity.
b) Yes, in case the group entity has decided to treat each Management Unit (MU) separately and not group the MUs into an RMU.

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| **Code** | INT-STD-30-005_17 |
| **Requirement (s)** | Clauses 4.2 and 4.2.1 |
| **Publication date** | 07. November 2022 |

**Clauses 4.2 and 4.2.1 of FSC-STD-30-005 V2-0 *Forest Management Groups* refer to Criterion 6.5 of the FSC Principles and Criteria V5-2. Are these clauses 4.2 and 4.2.1 applicable in countries where the Forest Stewardship Standard (FSS) is based on the FSC Principles and Criteria V4-0?**

Yes. Criterion 6.5 in the FSC Principles and Criteria V5-2 combines Criteria 6.4 and 10.5 of the FSC Principles and Criteria V4-0.
Therefore, Clauses 4.2 and 4.2.1 in FSC-STD-30-005 V2-0 apply to C6.4 and C10.5 in countries where the FSS is based on the FSC Principles and Criteria V4-0.

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| **Code** | INT-STD-30-005_19 |
| **Requirement (s)** | Clause 12.2 |
| **Publication date** | 24. August 2023 |

**In the framework of a group certificate, can products be sold in the name of persons who belong to a group member (manager, owner or one of the owners of the Management Unit) instead of the name of the group member itself as listed on the certificate and in the FSC database?**

No. Sales of certified products can only be made in the name of a person or organization covered by the scope of certification.
A legally recognized representative may sell products in the name of an organization or person that is covered by the scope of certification and that they are acknowledged to represent. The group entity shall ensure that the invoices include all relevant information as required by the applicable Forest Stewardship Standard.

# FSC-STD-30-010 (V3-0) CONTROLLED FOREST MANAGEMENT

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| **Code** | INT-STD-30-010_01 (also published with code INT-POL-01-007_01, INT-STD-20-012_01 and INT-PRO-01-007_01) |
| **Requirement (s)** | FSC-STD-30-010 V3-0 Transition end date, Scope, indicators 54.2.2 and 54.2.3.<br>FSC-STD-20-012 V2-0 Definitions<br>FSC-POL-01-007 V1-0 Scope<br>FSC-PRO-01-007 V1-0 Chapter 3, Sections 2, 18, 24, 25, Clauses 17.4.a; 17.4.d.i and Annex 5 |
| **Publication date** | 09. September 2024 |

**c) Which remedy actions is the CW/FM producer certified against <FSC-STD-30-010 V2-0 FSC Controlled Wood Standard for Forest Management Enterprises> required to complete for the past conversions, based on the indicators 54.2.2 and 54.2.3 in <FSC-STD-30-010 V3-0 Controlled Forest Management> and on the requirements in <FSC-PRO-01-007 Remedy Framework>,**

**v. before the transition end date (31 Dec 2025) of V3-0 of <FSC-STD-30-010 Controlled Forest Management>; and**

**vi. before the step-up evaluation (see the definition in <FSC-STD-20-012 Controlled Forest Management Evaluations>)?**

**d) Is a CW/FM producer, which has converted natural forests to plantations between 1 December 1994 and 31 December 2020 required to restore these planted areas in a 1:1 ratio back to the natural forest?**

c) The CW/FM producer which has converted natural forest in the past and is subject to the indicators 54.2.2 or 54.2.3 of <FSC-STD-30-010 V3-0 Controlled Forest Management>, shall:

v. contact the Alternative Dispute Resolution & Remedy Team at FSC International at remedy@fsc.org and enter into an agreement with FSC in conformity with Chapter 3, Section 2 of the <FSC-PRO-01-007 Remedy Framework> before the end of the transition period of 31 Dec 2025, and

vi. have an approved Remedy Plan in accordance with Chapter 3, Sections 24 and 25 of <FSC-PRO-01-007 FSC Remedy Framework> in place. The remedy process shall have reached the Initial Implementation Threshold for the environmental and social remedy during the 5-year CFM certification period, before the producer is eligible for entering the step-up evaluation for the full forest management certification.

NOTE: The CW producer which was not involved in conversion but which has acquired Management Units where conversion has taken place between 1 December 1994 and 31 December 2020, shall demonstrate restitution of priority social harms and partial remedy of environmental harms in conformity with the indicator 54.2.3 in <FSC-STD-30-010 V3-0 Controlled Forest Management>, unless the acquirement was completed by a CW/FM certificate holder before the effective date of <FSC-POL-01-007 V1-0 Policy to Address Conversion> (1 July 2023), as specified in the scope of that policy.

d) Yes, in the case where the CW/FM producer has converted natural forests to plantations according to indicator 54.2.2 in <FSC-STD-30-010 V3-0 Controlled Forest Management> the remedy action shall be proportionate (1:1) to the size of the converted area and equivalent to the nature of environmental harm caused by the conversion, as

stated in the Chapter 3, Clause 17.4.d.i of the <FSC-PRO-01-007 FSC Remedy Framework>.

- The selection of the remedy site is specified in the Chapter 3, Clause 17.4a of the <FSC-PRO-01-007 FSC Remedy Framework>, stating that the first priority for the selection is the actual site of conversion.

The remedy action may be either restoration, or conservation as indicated in Chapter 3, Section 18 of the <FSC-PRO-01-007 FSC Remedy Framework>.

## FSC-STD-60-002 (V1-0) STRUCTURE AND CONTENT OF NATIONAL FOREST STEWARDSHIP STANDARDS

| **Code** | INT-STD-60-002_01 |
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| **Requirement (s)** | Sections 1, 9 |
| **Publication date** | 10. April 2012 |

**A potential client has 7 FMUs. Six of them are in the region where the Great Lakes St-Lawrence Standard would apply. One FMU is in the same region but because of the altitude the forest type changes and it falls into the Boreal forest type where the Boreal Standard would normally apply.**

**The client wants to have only one certificate. Since 90% (6 FMUs) fall under the Great Lakes St-Lawrence Standard, would it be OK to include the remaining FMU under the same standard since it represents only 10 % of the whole territory?**

No, it is not possible to audit the remaining FMU against the same standard as the rest of FMUs. Each FMU shall be evaluated according to the applicable standards. There can still be one certificate provided it is clear which standard has been used to evaluate every FMU.

| **Code** | INT-FSC-STD-60-002_02 (also published under FSC-STD-20-007 with code INT-FSC-STD-20-007_64) |
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| **Requirement (s)** | Clause 8.2 |
| **Publication date** | 09. October 2023 |

**Can an approved and published Forest Stewardship Standard be used for evaluation prior to its effective date?**

Yes, an approved and published Forest Stewardship Standard can be used for evaluation after its publication date and prior to the effective date provided both The Organization and the certification body mutually agree to it.
However, attestation of certification shall be issued after the effective date.

# FSC-STD-60-004 (V1-0) INTERNATIONAL GENERIC INDICATORS

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| **Code** | INT-STD-60-004_01 |
| **Requirement (s)** | Clauses 6.5.5, 6.7.1 |
| **Publication date** | 06. October 2015 |

**Are riparian zones eligible to be counted in the minimum of 10% Conservation Area Network (IGI 6.5.5)?**

By default, riparian zones do not qualify to be included in the Conservation Area Network. Riparian zones may however be included, if those areas fully meet the definitions of representative sample areas, conservation zones, protection areas, connectivity as exemplified by wildlife corridors, providing the riparian zones are not disproportionately represented in the Conservation Area Network.
Riparian zones "created" or planted for purely functional roles, e.g. erosion control should be excluded.

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| **Code** | INT-STD-60-004_02 |
| **Requirement (s)** | FSC-STD-60-004 International Generic Indicators (IGI) 7.5.1 and 8.4.1<br>FSC-STD-01-001 V5-2 Definition of Interested stakeholder |
| **Publication date** | 23. July 2020 |

**FSC-STD-60-004 IGI 7.5.1 states that a summary of the management plan in a format comprehensible to stakeholders including maps and excluding confidential information is made publicly available at no cost. FSC-STD-60-004 IGI 8.4.1 states that a summary of the monitoring results in a format comprehensible to stakeholders including maps and excluding confidential information is made publicly available at no cost.**

**a) Shall The Organization provide the information of all the MUs located across the country to an individual based on the definition of "Interested stakeholders" in the FSC-STD-01-001 V5-2?**

Yes, the concept of stakeholder used in FSC-STD-60-004 Clauses 7.5.1 and 8.4.1 includes ´´interested stakeholders´´. The Organization shall make the information of all the MUs in the scope of the certificate across the country available to the interested stakeholders.

**b) What is the extent and scope of the definition of "Interested stakeholder"?**

An ''Interested stakeholder'' can be any individual, group of individuals, or entity that has shown an interest, or is known to have an interest, in the activities of a Management Unit. See the full definition in FSC-STD-01-001 V5-2

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| **Code** | INT-STD-60-004_03 (Also published in Ecosystem Interpretations under code INT-PRO-30-006_04) |
| **Requirement (s)** | FSC-STD-60-004 V2-0. Principle 5, Annex C.<br>List of national standards that include Annex C<br>FSC-PRO-30-006 |
| **Publication date** | 05. October 2020 |

**When a National Forest Stewardship Standard (NFSS) includes an Annex C for the verification of Ecosystem Services (ES) claims, should this annex be used for relevant certification activities or should the FSC-PRO-30-006 Ecosystem Services Procedure be used instead?**

FSC-PRO-30-006 prevails in all cases.
In the revision of FSC-STD-60-004 *International Generic Indicators* from V1-0 to V2-0, the ecosystem services requirements in Annex C were transferred into Part II of FSC-PRO-30-006. Organizations shall comply with the applicable requirements of Parts I, II, III, and IV of FSC-PRO-30-006 when they want to demonstrate the positive impact of their forest management on ecosystem services and use FSC ecosystem services claims.

## FSC-STD-60-004 (V2-1) INTERNATIONAL GENERIC INDICATORS

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| **Code** | INT-STD-60-004_04 (Also published under FSC-STD-20-001 with code INT-STD-20-001_46; FSC-STD-40-004 with code INT-STD-40-004_66; FSC-PRO-01-008 with code INT-PRO-01-008_01) |
| **Requirement (s)** | Indicators 1.6.1, 2.6.1 and 4.6.1 |
| **Publication date** | 14 December.2023 |

**Do the principles of the FSC Dispute Resolution System allow entities handling complaints to include and apply processes for handling persistent or vexatious complaints?**

Yes, Clause 1.3 of <FSC-PRO-01-008 V2-0 Processing Complaints in the FSC Certification Scheme> on procedural fairness relates to the criteria to be used by the entity handling complaints in the FSC system to make decisions about the inadmissibility of complaints. In particular, the entity handling complaints should ensure that any individual or organization has access to the FSC dispute resolution system for the purposes for which it is designed. Accordingly, the entity handling complaints shall ensure that a complaint is addressed to the correct entity according to the lowest-level principle, meets all formal requirements, is well-founded and is not abusive. These criteria enable stakeholders to be assured of a timely and effective dispute resolution system with a view to obtaining remedy.

Accordingly, entities handling complaints in the FSC system may include and apply processes as part of their complaints procedure for handling complaints that are persistent or vexatious in order to ensure the continued functioning of their operations and complaints processes, and to protect the health and well-being of their staff.

Scope

This interpretation is applicable to complaints procedures managed by:

a) FSC in relation to <FSC-PRO-01-008 Processing Complaints in the FSC Certification Scheme> and <FSC-PRO-01-009 Processing FSC Policy for Association Complaints>;

b) Certification bodies in relation to Clause 1.9 of <FSC-STD-20-001 V4-0 General requirements for FSC accredited certification bodies>;

c) Certificate holders in relation to:

   i. Clause 1.7 of <FSC-STD-40-004 V3-1 Chain of Custody Certification> (for chain of custody);

   ii. IGI 1.6.1, 2.6.1 and 4.6.1 of <FSC-STD-60-004 V2-1 International Generic Indicators> (for forest management).

When the entity handling the complaints in the FSC system is applying this interpretation, it shall consider the following:

**1. Definitions**

**Persistent complaint**:

A complaint:

a) that has already been resolved and closed; or

b) that has been submitted to any other entity handling complaints in the FSC system and are still under investigation; or

c) that is similar to a previously submitted complaint, with no or minor additions/variations and the complainant insists be treated as a new complaint.

**Vexatious complaint**:

A complaint:

a) without reasonable or probable cause; or

b) without good grounds or merit; or

c) meant to cause trouble and harm, namely malicious; or

d) meant to harass e.g., use of insulting and threatening language.

NOTE: this definition is adapted from: Garner BA and Black HC, Black's Law Dictionary, Thomson Reuters 2014

**2. Basic principles**

2.1 The presumption should always be that a complaint is made in good faith and that the abuse of the complaints and appeals mechanism is exceptional.

2.2 The concept of 'abuse' should be understood as the harmful exercise of the complaints mechanism for purposes other than those for which it is designed.

2.3 Every complaint shall be assessed for admissibility. Even if someone has made persistent or vexatious complaints in the past, it shall not be assumed that any other complaint they make will also be persistent or vexatious.

2.4 FSC does not tolerate violence and harassment in any form, whether direct or indirect by any party involved in a complaint.

**3. Procedural requirements**

3.1 The entity handling complaints in the FSC system shall assess and classify whether a complaint is 'persistent' or 'vexatious'.

3.2 A complaint classified as 'persistent' or 'vexatious' is considered inadmissible and can be rejected.

3.3 The decision on the inadmissibility of a complaint because of its persistent or vexatious nature shall be taken by the person/s having overall authority and responsibility for resolution of complaints.

3.4 The decision shall be recorded and communicated to the complainant within (2) weeks of making the decision.

3.5 The decision shall be communicated to their next higher level oversight body e.g. CB, ASI, FSC within (2) weeks of making the decision.

**4. Additional options for consequences**

4.1 If the complaint handling entity identifies the continuous submission of persistent and/or vexatious complaints by a complainant, the entity may impose further measures to prevent the abuse of the complaints mechanism. These additional consequences shall be proportionate to the abusive conduct of the complainant.

4.2 These consequences may include but are not limited to:

a) Placing limits on the number and duration of contacts with staff per week or month;
b) Offering a restricted timeslot for necessary contacts;
c) Limiting the complainant to one method of contact access channel (telephone, letter, email etc);
d) Providing a single point of contact;
e) Only considering a certain number of issues in a specific period with a request to prioritize;
f) Responding to the overall issue rather than each and every enquiry or complaint that has been classified as persistent and/or vexatious;
g) Considering complaints that have been classified as persistent and/or vexatious as stakeholder comments and addressing them during the next audit.

NOTE: Access to the complaint mechanism is to be ensured and therefore blocking a complainant is not allowed.

In most cases such consequences should apply for a limited period of time, e.g. between three and six months but in exceptional cases may be extended. In such cases the restrictions should be reviewed on a regular basis

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| **Code** | INT-STD-60-004_05 |
| **Requirement (s)** | FSC-STD-60-004 V2-1 International Generic Indicators (IGI), Indicator 3.1.2 (7), 4.1.2(7), 9.1.3 and 9.4.2. C9.1 and C9.4<br>FSC-GUI-30-003 V2-0 FSC Guidelines for the Implementation of the Right to Free, Prior and Informed Consent (FPIC)<br>FSC-GUI-30-009 V1-0 HCV Guidance for forest managers, Figure 10<br>FSC-GUI-30-010 V1-0 IFL Guidance for forest managers, Section 3.2<br>ADVICE-20-007-18 V3-0, Footnote 3<br>INT-DIR-20-007_17<br>INT-DIR-20-007_18 |
| **Publication date** | 16. January 2025 |

**Can The Organization make corrections to the Global Forest Watch (GFW)-based Intact Forest Landscape (IFL) maps within their management unit at any time when new evidence of previous human influence is detected ?**

Yes, corrections may be done when inaccuracies in IFL maps are detected in assessing the presence and status of IFLs (C9.1), or in monitoring the status of IFLs (C9.4), with the following preconditions:

1. An Organization that was certified before 1st January 2017 may correct the GFW-based IFL maps available on 1st January 2017. This applies both to the baseline assessment (C9.1) and monitoring assessments (C9.4).

2. An Organization that was certified thereafter, may correct the latest GFW-based IFL maps that were available at the date the certification was granted. This applies both to the baseline assessment (C9.1) and monitoring assessments (C9.4).

3. Assessment of the presence and status of IFLs shall conform with the IFL definition and Global Forest Watch inventory methodology https://intactforests.org/method.html, which has been further specified in Section 3.2 in FSC-GUI-30-010 as follows:

"*Areas with evidence of certain types of human influence are considered disturbed and consequently not eligible for inclusion in an IFL, including:*

- *Timber production areas, agricultural lands and human settlements with a buffer zone of 1 km;*
- *Primary and secondary forest roads and skid trails, with a buffer zone of 1 km on either side;*
- *Areas, where industrial activities occurred during the last 30-70 years, such as logging, mining, oil and gas exploration and extraction, peat extraction, etc.*

*Areas with evidence of low-intensity and old disturbances are treated as subject to "background" influence and are eligible for inclusion in an IFL. Sources of background influence include local shifting cultivation activities, diffuse grazing by domestic animals, low-intensity selective logging for non-commercial purposes, and hunting.''*

*3.1* "*Timber production areas*" refer to areas impacted by forestry operations, rather than areas zoned or intended for timber production - which may still remain an IFL for as long as it is not harvested.

*3.2* "*Human settlements*" of low intensity traditional habitation by Indigenous Peoples that maintains forest intactness are eligible to be included in an IFL.

*3.3* Evidence of industrial activities during the past 30-70 years may include, for example, documents related to harvesting (harvest plan, permissions from public authorities, selling and shipment documents); verified information on the land use history (old land-use plans including agriculture, mining, roads for commercial connections, non-indigenous settlements); interviews with the local communities, scientific surveys and publications on the region, and field verification (=ground truthing).

4. Assessment of the presence and status of IFLs shall be based on culturally appropriate engagement with affected rights holders, affected and interested stakeholders and experts as specified in the IGI 3.1.2 (7), IGI 4.1.2 (7), IGI 9.1.3 and IGI 9.4.2, considering FPIC Guidelines and engagement steps presented in the HCV Guidance (FSC-GUI-30-009, Figure 10).

5. Updated IFL maps shall be validated by the certification body and added to the forest management plan using geoprocessing tools, or manually. The maps shall be incorporated into the next forest certification public summary report, together with the map showing the overlap with GFW defined IFL (www.globalforestwatch.org) and the Management Unit. The Organization can start using the updated IFL maps once the Certification Body has validated them and recorded their validation.

| Code | INT-STD-60-004_06 |
|---|---|
| **Requirement (s)** | FSC-STD-60-004 V2-1<br>FSC-GUI-V1-0 |
| **Publication date** | 22. June 2026 |

**In situations where several Intact Forest Landscapes (IFL) overlap with a Management Unit (MU), can The Organization meet the core area threshold for the respective overlapping areas by designating a single core area equivalent to the overall required hectarage in only one of the IFLs located within the MU?**

Yes, an aggregation of the overall required core area hectarage in one or a selection of the overlapping IFLs is possible, provided that such an aggregation:

a) produces higher conservation benefits compared to 60-004 designating proportionate core areas per all the overlapping IFLs,
b) does not lead to an underrepresentation of ecosystems present across the total IFL area overlapping with the Management Unit, and
c) does not reduce any IFLs below the 50,000 ha threshold in the landscape.

## FSC-STD-60-006 (V1-2) PROCESS REQUIREMENTS FOR THE DEVELOPMENT AND MAINTENANCE OF NATIONAL FOREST STEWARDSHIP STANDARDS

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| **Code** | INT-STD-60-006_03 |
| **Requirement (s)** | Clause 4.3.e |
| **Publication date** | 16. March 2023 |

**Is a disassociated individual, or a representative of a disassociated organization or its corporate group eligible to be a member of a Standard Development Group (SDG)?**

No, a disassociated individual, or a representative of a disassociated organization or its corporate group is not eligible to be a member of an SDG because "Members of Standards Development Groups shall be selected on the basis of their: …(e) understanding of and support for FSC's mission and vision" (FSC-STD-60-006 V1-2 Clause 4.3e).

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|---|---|
| **Code** | INT-STD-60-006_02 |
| **Requirement (s)** | Clause 10.5.f |
| **Publication date** | 15.June 2018 |

**Are Standard Development Groups required to conform to Clause 10.5 f) if the 'pre-approval' draft has been developed in one of the official languages of FSC?**

No, in such cases, the 'pre-approval' draft can be submitted to PSU without the need for translation (also see FSC-STD-60-002 V1-0 Clause 7.1).

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| **Code** | INT-STD-60-006_01 (also published under FSC-PRO-01-001 with code INT-PRO-01-001_01) |
| **Requirement (s)** | Clause 13.1<br>NOTE: This interpretation will be added as a new section to FSC-STD-60-006 in the next revision. |
| **Publication date** | 14. March 2016 |

**Which body is responsible to give formal and binding interpretations of National Forest Stewardship Standards?**

Interpretation of National Forest Stewardship Standards:

- Requests for interpretation of National Forest Stewardship Standards may originate from accredited Certification Bodies (CBs), Certificate Holders (CHs) or interested stakeholders in the country (or region) covered by the scope of the Forest Stewardship Standard.

- The Interpretation request(s) shall be made on specific issues in the Forest Stewardship standard. It should include clear and correct reference to the indicator(s) for which the interpretation is requested, some background information and suggested response.

- Interpretation request(s) shall be sent to FSC National Office (NO) or registered Standards Development Groups (SDG) for processing where these bodies exist.

Where they do not exist, interpretation requests shall be sent to the FSC Policy and Standards Unit (PSU).

- NOs or registered SDGs shall be responsible for developing interpretation(s) to their Forest Stewardship Standards.
- Before addressing the interpretation request, the NO or registered SDG shall first seek if there is an existing interpretation(s) addressing the issue in the Forest Stewardship Standards interpretation database available in the FSC IC website.
- If there is already an approved interpretation(s) on the issue it shall be adopted as appropriate.
- All Interpretation(s) developed by NOs or registered SDGs shall be sent to the FSC PSU for formal approval and publishing in the FSC IC website.

**NOTE:** Interpretation(s) are only valid after the review and approval of the FSC PSU. It is the responsibility of the NO or the registered SDG to analyze any requests or need for interpretation of Forest Stewardship Standards.

- Interpretation(s) developed by NOs or registered SDGs shall be presented to the FSC PSU as illustrated in Box1.

Box 1.

**FORMAT FOR INTERPRETATIONS**

**Keyword(s)**: [*name a few key words that define/classify the enquiry]*

**Enquiry**: [*formulate the interpretation request as a question; background may be included]*

**Proposed Interpretation**: [*propose a response]*

**Normative Reference**: [*the FSC Forest Stewardship Standard and indicator the enquiry refers to]*

- NO or registered SDGs, shall decide on the process to develop and consult on interpretation(s) prior to submitting it to the FSC PSU.

**NOTE**: The process shall be designed in relation to the scale and controversy of the issue, considering the requirements set out in this standard and shall uphold FSC values of stakeholders' engagement.

- FSC PSU shall process interpretation requests from NO or registered SDG in line with its internal procedure (section 3 of the *PSU Enquiry Procedure; PSU-PRO-10-201 V1-1EN*).
- The FSC PSU shall evaluate the proposed interpretation(s) and respond within thirty (30) days

- If interpretation(s) are approved they shall be registered in the PSU interpretation database and the NO or SDG shall be informed accordingly.

- All approved interpretation(s) shall be published by the NO or SDG and national stakeholders informed accordingly.

# DIRECTIVES

## FSC-DIR-20-007 FSC DIRECTIVE ON FSC FOREST MANAGEMENT EVALUATIONS

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| **Code** | INT-DIR-20-007_05 (also published under FSC-STD-01-001 with code INT-STD-01-001_06) |
| **Requirement (s)** | ADVICE-20-007-03 |
| **Publication date** | 26. August 2013 |

**We have two clients, which are certified under single certificates.**
**These two companies are owners of a part of their lands and concessionaires of the second part, comprised of small owners' concessions.**
**The small owners have contractually given full operational, administrative and responsibilities to these companies to manage the forest for 30 years, there is no ambiguity about the concession status of their lands.**
**Now these two companies want to enter into an FSC certification group that will be managed by a third company (Type I group, shared responsibilities). This third company is the mother company of these 2 forest companies.**
**We think that they can be considered as classical group members managing their own lands and concessions.**

**Shall each small owner be considered/become a group member?**

No, owners don´t have to become group members, as long as the manager has explicit authorization from the owner to manage the forest in compliance with the FSC P&C.

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| **Code** | INT-DIR-20-007_10 |
| **Requirement (s)** | ADVICE-20-007_05 |
| **Publication date** | 15. June 2018 |

**When can the scope of a forest management certificate include Non-Timber Forest Products (NTFP)?**

The certification body may include Non-Timber Forest Products (NTFP) into the scope of certificate only when NTFP were evaluated against an approved National Forest Stewardship Standard (NFSS) with relevant NTFP indicators or a NTFP interim CB standard, which meets the requirements specified in ADVICE-20-007-05.

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|---|---|
| **Code** | INT-DIR-20-007_11 |
| **Requirement (s)** | ADVICE-20-007_05 |
| **Publication date** | 15. June 2018 |

**When is a FSC-approved National Forest Stewardship Standard qualified for Non-Timber Forest Products (NTFP) evaluations where the purpose is to get certified status for NTFP?**

A FSC-approved National Forest Stewardship Standard (NFSS) is qualified for Non-Timber Forest Products (NTFP) evaluations when its scope explicitly mentions the possibility to apply the standard for certification of a particular NTFP and includes specific indicators for those NTFPs.

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| **Code** | INT-DIR-20-007_12 |
| **Requirement (s)** | ADVICE-20-007_05 |
| **Publication date** | 15. June 2018 |

**When is an Interim National Standard (Principles and Criteria V5-2) qualified for Non-Timber Forest Products (NTFP) evaluations where the purpose is to get certified status for NTFP?**

An approved Interim National Standard is qualified for Non-Timber Forest Products (NTFP) evaluations in case when its scope explicitly mentions the possibility to apply the standard for certification of a particular NTFP and includes specific indicators for those NTFPs.

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| **Code** | INT-DIR-20-007_09 |
| **Requirement (s)** | ADVICE-20-007_05 |
| **Publication date** | 24. July 2015 |

**a) Is it possible to promote Christmas tree seeds from FSC certified forests with the FSC trademarks?**
**b) Can any FSC claim be made to Christmas trees grown from FSC certified seeds in a non-FSC certified plantation?**

a) Yes, provided that this non-timber forest product (NTFP) has been evaluated against a standard prepared or adapted in the country for this NTFP or a NTFP interim CB standard, which meets the requirements specified in ADVICE-20-007-05.
b) No, because the plantation has not been evaluated against FSC requirements.

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| **Code** | INT-DIR-20-007_06 |
| **Requirement (s)** | ADVICE-20-007-05, Advice 4 |
| **Publication date** | 06. June 2014 |

**According to ADVICE-20-007-05, non-timber forest products (NTFPs) shall be subject to evaluation against a standard prepared or adapted in the region for that NTFP or a NTFP interim CB standard, which meets the requirements specified in the advice note.**
**Christmas trees are defined as NTFP by FSC-STD-40-004a (N6.3.1).**
**However, there are approved National Forest Stewardship Standard that explicitly allow the certification of Christmas trees although no NTFP specific indicators have been defined. Can Christmas trees be evaluated against this National Standards?**

If the Christmas trees come from natural forests (eg. natural regeneration, tree tops) , they can be evaluated against the applicable National Forest Stewardship Standard.
If they come from short rotation plantations, Advice-20-007-05 shall be applied.

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| **Code** | INT-DIR-20-007_02 |
| **Requirement (s)** | ADVICE-20-007-05 |
| **Publication date** | 04. May 2012 |

**Can FSC claim be applied to seedlings produced from seeds originating from FSC certified FMUs and grown in nurseries included in the scope of a valid FSC certified FM certificate.**

Yes, seedlings produced from seeds originating from FSC certified FMUs and grown in nurseries within FSC certified FMUs that comply with FSC P&C may be claimed as 'FSC certified' following the normal guidance for certification and labelling of non-timber forest products.

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| **Code** | INT-DIR-20-007_01 (also published under FSC-STD-20-007 with code INT-STD-20-007_09) |
| **Requirement (s)** | ADVICE-20-007-05 |
| **Publication date** | 31. January 2012 |

**Can a Certification Body (CB) certify a young plantation as Forest Management (FM) only (instead of FM/CoC (Chain of Custody))?**

No, plantations must have an FM/CoC certificate. They are considered as commercial operations and the aim of the forest management is to sell timber. According to FSC-STD-20-007, "...Forest products must be covered by a valid Chain of Custody certificate, or by a joint Forest Management/Chain of Custody certificate, in order to be eligible to carry the FSC Logo and to enter into further chains of custody".

In accordance with Advice-20-007-05 in FSC-DIR-20-007, whenever the aim of the forest management is to sell timber, non timber forest products or ecosystem services, there is need to have a CoC certificate or a joint FM/CoC certificate issued by an FSC-accredited certification body which includes the specified product(s) within its scope.

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| **Code** | INT-DIR-20-007_13 |
| **Requirement (s)** | ADVICE-20-007-05 |
| **Publication date** | 03. December 2018 |

**Where a company is interested in certifying a non-timber forest product (NTFP) but the National Forest Stewardship Standard (NFSS) does not include specific indicators for the certification of this particular NTFP and there is no specific standard for NTFP certification in the country, how shall the certification body (CB) proceed to be able to issue a certificate for this product?**

The certification body shall proceed according to the following scenarios:

| Scenarios | Based on Principles & Criteria V4 | Based on Principles &Criteria V5 |
|---|---|---|
| **Country with National Forest Stewardship Standard (NFSS) or Interim National Standard (INS) in V5** | The certification body cannot develop or adapt a NTFP standard based on P&C V4. | The certification body shall develop an INS for NTFP based on the NTFP indicators in Generic Forest Stewardship Standard (GFSS) in conformance with clause 2.4.1 of FSC-PRO-60-007 *Structure, Content and Development of Interim National Standards*.<br><br>In countries with NFSS this may only occur with the prior approval of the SDG, FSC National Board or PSU (in order of priority).<br><br>The NTFP Standard shall be submitted to PSC (via PSU) for decision making.<br><br>The NTFP standard shall be integrated into the INS or NFSS, in the next regular revision. |
| **Country with National Forest Stewardship Standard (NFSS) or CB** | <u>OPTION 1</u><br>a) If the CB has a generic NTFP standard based on FSC Principles & Criteria V4 approved by ASI, the certification body shall make | <u>OPTION 2</u><br>The certification body shall develop an INS for NTFP based on the NTFP indicators in Generic Forest Stewardship Standard (GFSS) in |

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| **Standard in V4.**<br><br>There are two options in this scenario. Option 2 should be the priority option for CBs. | the local adaptation to the particular NTFP.<br>If there is a SDG registered by PSU in the country, the approval of the SDG to make this local adaptation is not required but recommended.<br>PSU will conduct a quality check, but no formal approval from FSC or the PSC is required.<br><br>*b)* If the CB has no generic NTFP standard based on FSC Principles & Criteria V4 approved by ASI, the certification body shall develop a generic NTFP standard in conformance with FSC-STD-20-002 (V3-0) EN *Structure, Content and Local Adaptation of Generic Forest Stewardship Standards.*<br>The generic NTFP standard shall be submitted to PSU for decision making.<br>Once approved, the certification body shall make the local adaptation to the particular NTFP. | conformance with clause 2.4.1 of FSC-PRO-60-007 *Structure, Content and Development of Interim National Standards.*<br><br>The NTFP Standard shall be submitted to PSC (via PSU) for decision making. | |
| **Country with no National Forest Stewardship Standard (NFSS) or CB Standard** | The certification body cannot develop or adapt a NTFP standard based on P&C V4. | The certification body shall develop a complete INS in conformance with FSC-PRO-60-007 *Structure, Content and Development of Interim National Standards* which incorporates also NTFP indicators for the NTFP.<br><br>The INS shall be submitted to PSC (via PSU) for decision making. | |

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| **Code** | INT-DIR-20-007_19 |
| **Requirement (s)** | ADVICE-20-007-05<br>FSC-STD-40-004a;<br>INT-DIR-20-007_11; INT-DIR-20-007_13 |
| **Publication date** | 11. May 2026 |

**Under what conditions can NTFPs (e.g., honey, seed oil, bark) be sold with FSC claims under FM certification?**
**Specifically:**

- **Whether explicit inclusion in the FSS scope is required, and**
- **Whether product classification or origin (e.g., by-product of timber) affects eligibility.**

**1. Product classification**

According to FSC-STD-40-004a, product classifications are normative and cannot be altered or reassigned. For example, bark is classified as "N1 Bark under NTFPs" and cannot be reclassified as "W19 Other wood products."

**2. Certification scope and eligibility for FSC claims**

If a specific NTFP is not included within the scope of an approved FSS, it would not be eligible for certification under the current version of that standard. While some FSSs include NTFP-related indicators (for example, under provisions addressing monitoring or harvesting), the extent and level of detail of such coverage vary across standards. The presence of general forest management indicators does not automatically extend the scope of certification to additional product categories that are not explicitly covered by the standard.

**3. By-products of timber harvesting**

The origin of a product as a by-product of timber harvesting does not determine its eligibility for FSC certification.

According to FSC-STD-40-004a, wood products and NTFPs are treated as distinct product categories, and materials such as bark remain classified as NTFPs even when they are produced during timber operations. Therefore, such by-products do not automatically inherit FSC-certified status and shall independently meet the requirements applicable to NTFPs, including being explicitly included within the certification scope.

**4. Possible pathway for urgent inclusion of NTFPs**

The appropriate approach to include specific NTFPs in FSC certification is through the revision of the FSS, including both the certification scope and the applicable provisions. However, in cases where there is a justified and urgent need, a derogation request to FSC International may be considered as an interim measure. Such a request shall propose:

- The inclusion of the specific NTFP(s) within the scope of the applicable FSS; and
- Where necessary (i.e., for honey and game), the addition of relevant indicator(s) to ensure adequate coverage of their production.

**5. General expectations for NTFP certification**

Where NTFPs are included within the scope of certification, it is expected that:

- The production of the NTFP(s) is reflected in the certificate holder's management plan;

- The products are identifiable, segregated from non-certified sources, and traceable; and
- Harvesting and production conform to applicable FSS requirements, including relevant environmental and social safeguards (e.g., IGI 5.2.4).

**6. Conclusion**

- If specific NTFPs are not included in the scope of the applicable FSS, they cannot be sold with FSC claims under FM certification, regardless of management requirements.
- Reclassification of NTFPs as wood products is not permitted.

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| **Code** | INT- DIR-20-007_08 |
| **Requirement (s)** | ADVICE-20-007-10 |
| **Publication date** | 18. January 2015 |

**According to Advice-20-007-10, plantations under an FM certificate can not be converted to non-forest use, unless the requirements in Criterion 6.10 (P&C V4-0) are met.**
**At the 2014 General Assembly, Motion 2014#7 changed the P&C V5-0 to allow conversion of plantations to non-forest use, if the plantations were not established on sites directly converted from natural forest.**
**As this is the intent of FSC membership, can the changes resulting from Motion 2014#7 be applied before the P&C V5 comes into effect?**

No, changes resulting from Motion 2014#7 shall only be applied once the IGIs are approved and the version 5 of P&C comes into effect. Until then, if a plantation site was previously in non-forest use, it may not be converted back to non-forest use unless the requirements in Criterion 6.10 (P&C V4-0) are met.
Note. This interpretation has been reconfirmed by the FSC Board of Directors in August 2015

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| **Code** | INT-DIR-20-007_03 |
| **Requirement (s)** | ADVICE-20-007-15, Advice 1 |
| **Publication date** | 19. July 2013 |

**The title of the Advice Note FSC-ADV-20-007-15 refers to "...*areas converted from natural forest to plantations between 01 November 1994 and 01 April 2013*".**

**However, Advice 1 of the Advice Note states: "*In order to certify MUs in situations as described above, the Organization shall split the existing MU containing post-1994 conversion plantations into 2 or more subunits to separate the post-1994 plantation areas from the potentially certifiable areas.*"**

**Does this mean that the Advice can also be applied to post 01 April 2013 conversions?**

No, the Advice cannot be applied for conversions after 01 April 2013.

The Advice Note is to be applied to MUs with areas converted between 01 November 1994 and 01 April 2013 only.

| Code | INT-DIR-20-007_07 |
|---|---|
| **Requirement (s)** | ADVICE- 20-007-016 |
| **Publication date** | 13. November 2014 |

**Can the existing Advice-20-007-016 *Wind turbines establishment within FSC certified areas* be extended to hydroelectric power stations?**

No, the Advice-20-007-016 is targeted to the wind turbines only and cannot be extended to hydroelectric power stations.

| Code | INT-DIR-20-007_14 |
|---|---|
| **Requirement (s)** | ADVICE- 20-007-016 |
| **Publication date** | 13. November 2014, Updated on 10 July 2019 to clarify the scope |

**Can the existing Advice-20-007-016 Wind turbines establishment within FSC certified areas be extended to other clean/renewable energy infrastructure development, such as hydroelectric power stations, transmission line corridors for hydro power and solar farms?**

No, the Advice-20-007-016 is targeted to the wind turbines only and cannot be extended to other clean/renewable energy infrastructure development

| Code | INT-DIR-20-007_04 |
|---|---|
| **Requirement (s)** | ADVICE-20-007-016 |
| **Publication date** | 20. August 2013 |

**Where an approved National Standard allows conversion not in the circumstances permitted by Advice-20-007-016, does the Advice Note prevail over an FSC approved National Standard or vice versa?**

The Advice Note FSC-ADV-20-007-16 on wind turbines prevails over any FSC National Standard.

| Code | INT-DIR-20-007_15 |
|---|---|
| **Requirement (s)** | ADVICE-20-007-018 V1-0, FSC-STD-20-007 Clause 6.3.8 |
| **Publication date** | 10. July 2019 |

**Are certification bodies (CBs) required to evaluate the whole of Principle 9 in order to assess Advice Note 20-007-18 at every surveillance audit for countries with Intact Forest Landscapes (IFLs)?**

No. Only the Advice Note 20-007-18 itself and the Criterion 9.4 must be evaluated in every surveillance audit. In addition to that, CBs are expected to apply a risk-based approach in targeting the evaluations to ensure certificate holder's full conformity with applicable FSC requirements.

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| **Code** | INT-DIR-20-007_16 |
| **Requirement (s)** | ADVICE-20-007-018 V1-0,<br>FSC-STD-01-001 V5-2; Criterion 5.2,<br>FSC-STD-60-004 V2-0 Criterion 5.2 Instructions for standard developers<br>National standards based on FSC Principles and Criteria V4 and V5 |
| **Publication date** | 3. April 2020. Update on 20. May 2020 to update reference to requirements |

**ADV-20-007-18 v1-0 requires FSC Forest Management (FM) certificate holders with Intact Forest Landscapes (IFL) to protect 80% of IFLs on their certified Management Units(MU) from forestry activities (harvesting is prohibited). As harvesting is prohibited within this area, are certificate holders required to exclude this area when calculating AAC for their MU(s) under FSC-STD-01-001 V5-2; criterion 5.2?**

Yes, the IFL area required to be protected by ADV-20-007-18 v1-0 shall be excluded from total area used to calculate AAC for FSC certified MUs.

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| **Code** | INT-DIR-20-007_17 |
| **Requirement (s)** | ADVICE-20-007-018 V1-0 Clause 1.3<br>FSC-GUI-30-010 Intact Forest Landscapes Guidance for Forest Managers, Chapter 3.2 Steps to Assess Intact Forest Landscapes<br>FSC-STD-20-007b Forest management evaluations addendum – Forest certification public summary reports |
| **Publication date** | 20. May 2020 |

ADVICE-20-007-018 V1-0 Clause 1.3 states that , **"***Global Forest Watch IFL maps…or a more recent IFL inventory using the same methodology, … shall be used in all regions as a baseline***''**

**a) Can certificate holders conduct "a more recent Intact Forest Landscape (IFL) inventory'' within the Management Unit?**

Yes, they can, if they are subject to the requirements of the Advice Note. This interpretation does not apply to certificate holders subject to requirements of an approved national standard that includes national IFL indicators.

**b) What does "using the same methodology'' mean in this context?**

Certificate holders are expected to use the best available remote sensing data validated by ground truthing, when they have technical and financial resources to do so. However, certificate holders may update the IFL boundaries using also other forms of best available information, such as historical harvesting doucumentation combined with sales invoices, maps and external data provided by independent organizations, scientists and experts. Presence of IFL can be assessed based on Section 3.2 in FSC-GUI-30-010, which states:

"*Areas with evidence of certain types of human influence are considered disturbed and consequently not eligible for inclusion in an IFL, including:*

- *Timber production areas, agricultural lands and human settlements with a buffer zone of 1 km;*
- *Primary and secondary forest roads and skid trails, with a buffer zone of 1 km on either side;*
- *Areas, where industrial activities occurred during the last 30-70 years, such as logging, mining, oil and gas exploration and extraction, peat extraction, etc.*

*Areas with evidence of low-intensity and old disturbances are treated as subject to "background" influence and are eligible for inclusion in an IFL. Sources of background*

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| *influence include local shifting cultivation activities, diffuse grazing by domestic animals, low-intensity selective logging for non-commercial purposes, and hunting.''*<br><br>**NOTE:** The definition for IFL given in http://www.intactforests.org/concept.html differs from the FSC IFL guide. The difference originates from the terms " low-intensity selective logging'' and "unpaved trails'' which needed further clarification to be understood correctly. These two terms were discussed in a Workshop in Brazil in Nov 2017 and thereafter between FSC High Conservation Value Technical Working Group, World Resource Institute and Global Forest Watch, which resulted the wording above.<br><br>**NOTE:** "*Timber production areas*" refer to areas impacted by forestry operations, rather than areas zoned or intended for timber production - which may still remain an IFL. "*Human settlements*" of low intensity traditional habitation by Indigenous Peoples that maintains forest intactness are eligible for inclusion in an IFL.<br><br>**c) Who validates the updated IFL maps and when can the certificate holder start using them ?**<br><br>Updated IFL maps shall be validated by the certification body and added to the forest management plan using geoprocessing tools, or manually. The maps shall be incorporated into the next forest certification public summary report, together with the map showing the overlap with GFW defined IFL (www.globalforestwatch.org) and the Management Unit. The certificate holder can start using the updated IFL maps once the Certification Body has validated them and recorded their validation. |

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| **Code** | INT-DIR-20-007_18 |
| **Requirement (s)** | ADVICE-20-007-018 V1-0,<br>Clause 1.3 |
| **Publication date** | 07. November 2022 |
| **Clause 1.3. states that "*Global Forest Watch IFL maps http://www.globalforestwatch.org, or a more recent IFL inventory using the same methodology, such as Global Forest Watch Canada, shall be used in all regions as a baseline*".**<br><br>**a) Global Forest Watch (GFW) is repeatedly updating the IFL maps in its website, and usually in 3-year cycles for the tropical areas. Which of those maps shall The Organization use as a baseline for identifying the IFL area within the management unit?**<br>**b) If there is evidence that an area classified as IFL was already impacted by industrial activities during the last 30 -70 years and should not have been considered as IFL in the first place, is The Organization required to wait for new versions of the GFW maps to update their IFL baseline?**<br>**c) Does The Organization have to recalculate the IFL area impacted by their forest management operations when a new GFW IFL map is published?**<br><br>a) The Organizations, which were certified before 1st January 2017, shall use the map which was available on 1st January 2017.<br>The Organizations, which were certified after 31st December 2016, shall use the latest updated maps available at the date of the first main evaluation.<br>b) No, if new evidence shows that areas classified as impacted by forest management operations should not have been considered IFL areas in the first place, The Organization may update their IFL baseline map accordingly and it is not required to manage those areas as IFLs.<br>c) No, the baseline map established according to section a) (above) applies. | |

# PROCEDURES

## FSC-PRO-01-007 (V1-0) FSC REMEDY FRAMEWORK

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|---|---|
| **Code** | INT-PRO-01-007_01 (also published with code INT-POL-01-007_01, INT-STD-30-010_01 and INT-STD-20-012_01) |
| **Requirement (s)** | FSC-PRO-01-007 V1-0 Chapter 3, Sections 2, 18, 24, 25, Clauses 17.4.a; 17.4.d.i and Annex 5<br>FSC-POL-01-007 V1-0 Scope<br>FSC-STD-30-010 V3-0 Transition end date, Scope, indicators 54.2.2 and 54.2.3.<br>FSC-STD-20-012 V2-0 Definitions |
| **Publication date** | 09. September 2024 |

**a) Which remedy actions is the CW/FM producer certified against <FSC-STD-30-010 V2-0 FSC Controlled Wood Standard for Forest Management Enterprises> required to complete for the past conversions, based on the indicators 54.2.2 and 54.2.3 in <FSC-STD-30-010 V3-0 Controlled Forest Management> and on the requirements in <FSC-PRO-01-007 Remedy Framework>,**

**i. before the transition end date (31 Dec 2025) of V3-0 of <FSC-STD-30-010 Controlled Forest Management>; and**

**ii. before the step-up evaluation (see the definition in <FSC-STD-20-012 Controlled Forest Management Evaluations>)?**

**b) Is a CW/FM producer, which has converted natural forests to plantations between 1 December 1994 and 31 December 2020 required to restore these planted areas in a 1:1 ratio back to the natural forest?**

a) The CW/FM producer which has converted natural forest in the past and is subject to the indicators 54.2.2 or 54.2.3 of <FSC-STD-30-010 V3-0 Controlled Forest Management>, shall:

i. contact the Alternative Dispute Resolution & Remedy Team at FSC International at remedy@fsc.org and enter into an agreement with FSC in conformity with Chapter 3, Section 2 of the <FSC-PRO-01-007 Remedy Framework> before the end of the transition period of 31 Dec 2025, and

ii. have an approved Remedy Plan in accordance with Chapter 3, Sections 24 and 25 of <FSC-PRO-01-007 FSC Remedy Framework> in place. The remedy process shall have reached the Initial Implementation Threshold for the environmental and social remedy during the 5-year CFM certification period, before the producer is eligible for entering the step-up evaluation for the full forest management certification.

NOTE: The CW producer which was not involved in conversion but which has acquired Management Units where conversion has taken place between 1 December 1994 and 31 December 2020, shall demonstrate restitution of priority social harms and partial remedy of environmental harms in conformity with the indicator 54.2.3 in <FSC-STD-30-010 V3-0 Controlled Forest Management>, unless the acquirement was completed by a CW/FM certificate holder before the effective date of <FSC-POL-01-007 V1-0 Policy to Address Conversion> (1 July 2023), as specified in the scope of that policy.

b) Yes, in the case where the CW/FM producer has converted natural forests to plantations according to indicator 54.2.2 in <FSC-STD-30-010 V3-0 Controlled Forest Management> the remedy action shall be proportionate (1:1) to the size of the converted area and equivalent to the nature of environmental harm caused by the conversion, as stated in the Chapter 3, Clause 17.4.d.i of the <FSC-PRO-01-007 FSC Remedy Framework>.

- The selection of the remedy site is specified in the Chapter 3, Clause 17.4a of the <FSC-PRO-01-007 FSC Remedy Framework>, stating that the first priority for the selection is the actual site of conversion.

The remedy action may be either restoration, or conservation as indicated in Chapter 3, Section 18 of the <FSC-PRO-01-007 FSC Remedy Framework>.

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| **Code** | INT-PRO-01-007_02 (also published with code INT-POL-01-007_02) |
| **Requirement (s)** | FSC-PRO-01-007 V1-0 FSC Remedy Framework Chapter 3, Clause 2.2 and 30.6<br>FSC-POL-01-007 V1-0 Policy to Address Conversion Scope, Point 3<br>FSC-POL-01-004 V2-0 Policy for the Association of Organizations with FSC  Definitions for Direct Involvement and Indirect Involvement |
| **Publication date** | 29. January 2025 |

**a) Can an organization pursuing remedy for conversion of natural forest be responsible for partial remedy for a certain period of time when they had no involvement and full remedy for a certain time period when the organization had involvement, with the conversion taking place between 31 December 1994 and 31 December 2020?**

Yes, whether an organization is responsible for full or partial remedy depends on whether there was direct or indirect involvement of the company in the conversion, or not (see the Definitions for Direct Involvement and Indirect Involvement in FSC-POL-01-004 V2-0).

**b) May an organization which is part of a corporate group as defined by FSC-PRO-01-007 FSC Remedy Framework currently associated with FSC with no involvement in the conversion of a Management Unit (MU) sign the Remedy Agreement under Chapter 3, 2.1 of FSC-PRO-01-007 FSC Remedy Framework on behalf of The Organization when The Organization is part of the same corporate group?**

Yes, The Organization may permit a different organization which is part of the corporate group to sign the Remedy Agreement on their behalf if the corporate group is associated with FSC. The signatory in the corporate group shall assume the ultimate responsibility for the plan, implementation, and delivery of conservation and restoration outcomes and social benefits as described in 2.4 of FSC-PRO-01-007 FSC Remedy Framework.

NOTE: The association of the corporate group provides a safeguard that the organization in the corporate group is aligned with FSC’s core values and has not committed significant conversion as defined by the Policy for Association V2.

**c) If the associated corporate group signs the remedy agreement, shall they remedy all conversion across all MUs in the corporate group, or may they pursue remedy for individual MUs?**

The associated corporate group may select individual MUs to be remedied to become eligible for forest management certification and is not required to pursue remedy in all MUs in the corporate group.

d) **If The Organization held FSC forest management certification at the time the Policy to Address Conversion became effective, does the exception indicated in the point 3 in the Scope of that Policy still apply if the remedy agreement is signed by an organization in the corporate group on their behalf?**

Yes, if the Management Unit held FSC forest management certification at the time the Policy to Address Conversion became effective, remedy is not required to be carried out for the Management Unit if the legal entity signing the remedy agreement had no involvement in the conversion.

e) **Does The Organization's FSC forest management certification need to remain continuously valid from the time the Policy to Address Conversion became effective until it or its corporate group enters into a remedy agreement to take advantage of the exemption in point 3 in the Scope of Policy to Address Conversion?**

Yes, the certification must remain continuously valid for the exception to apply, unless there is a Remedy Agreement in place with FSC under 2.1 of FSC-PRO-01-007 FSC Remedy Framework and a remedy process is underway.

## FSC-PRO-30-011 CONTINUOUS IMPROVEMENT PROCEDURE

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| **Code** | INT-PRO-30-011_01 |
| **Requirement (s)** | FSC-PRO-30-011 V1-1 Clause 7.1 |
| **Publication date** | 17. October 2024 |

**Does the role of the local expert within the audit team, as proposed by the Continuous Improvement Procedure (CIP), constitute a conflict of interest?**

The role of a local expert within the audit team does not constitute a conflict of interest if the following conditions are met:

1. The local expert does not act as an auditor and is not involved in providing consultancy and direct support to help the client conform with the FSC standard requirements (Source: Definition of local expert, FSC-PRO-30-011 V1-1), AND
2. The local expert is not involved in reviewing audit results or making certification decisions (Source: Clause 1.5.11, FSC-STD-20-001 V4-0).

## FSC-PRO-60-006 DEVELOPMENT AND TRANSFER OF NATIONAL FOREST STEWARDSHIP STANDARDS TO THE FSC PRINCIPLES AND CRITERIA (5-1)

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| **Code** | INT-PRO-60-006_01 |
| **Requirement (s)** | FSC-PRO-60-006 V2-0 Clause 8.4. |
| **Publication date** | 23. July 2020 |

**Does this clause require certificate holders (CH) to be evaluated against the new national forest stewardship standard (NFSS) in the first audit that follows the effective date, especially when the transition period is not aligned with the calendar year which forms the basis for FM audits?**

No, a CH can choose whether the first audit following the effective date should be conducted against the old or new version of the NFSS, as long as they have been evaluated against the new version before the end of the transition. Therefore, if a CH decides to have the first audit against the old standard, a second audit within the transition period shall be conducted against the new version in order to maintain the certificate.

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