



Standard Addendum

FSC REGULATORY MODULE – FOREST MANAGEMENT EVALUATIONS

FSC-STD-02-007r V1-1



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INTRODUCTION

The Forest Stewardship Council (FSC) has developed the FSC Regulatory Module to assist FSC certificate holders in aligning their practices with the requirements of Regulation (EU) 2023/1115 (commonly referred to as the European Union Deforestation Regulation, or the EUDR). The FSC Regulatory Module sets the framework and requirements for organizations to:

- introduce a due diligence system to support EUDR compliance, including information collection, risk assessment and risk mitigation;
- gather and transmit precise information on the origin of products, including geolocation and time of production; and
- ensure that only deforestation-free material enters the FSC chain of custody.

Voluntary add-on module

Existing FSC certificate holders with Forest Management, Chain of Custody, Project Certification, or Controlled Wood Certification can **voluntarily** choose to also become certified against the Regulatory Module.

Using the FSC Regulatory Module

The Regulatory Module benefits organizations by translating the EUDR's legislative requirements into certification requirements. This is useful for organizations required to comply with the EUDR on top of their existing certification, including organizations that are placing (or making available) relevant products on the European Union market, or exporting relevant products from the European Union (EU).

The FSC Regulatory Module can also be used by non-EU based certificate holders who would like to ensure their products can be easily placed on the EU market by operators. If every FSC-certified organization in a supply chain is certified against the FSC Regulatory Module, this increases the availability of necessary data and reduces the demand, effort, and risks associated with conducting due diligence.

The organizations that are not necessarily required to comply with the EUDR but are in the supply chains of products that will eventually be placed (or made available) on the European Union market may wish to become certified against the Regulatory Module to assist downstream entities in their supply chains.

Independent evaluation

Organizations opting to become certified against the FSC Regulatory Module will be audited by their certification body for conformity, which provides an additional layer of assurance. While certification bodies evaluate conformity with the requirements of the FSC Regulatory Module, the ultimate decision on EUDR compliance rests with relevant competent authorities.

Relevant claims

Organizations that become certified against the FSC Regulatory Module can make use of a Regulatory Claim on sales documents for certified products, and make promotional statements about conducting the EUDR-required due diligence with support from FSC's robust system.

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A. SCOPE

This standard addendum is for voluntary use by certification bodies to evaluate conformity of organizations applying for or holding FSC Forest Management (FSC FM) or Controlled Forest Management (FSC CFM) Certification to extend their certification scope in order to align with the Regulation (EU) 2023/1115 (also referred to in this standard as ‘the Regulation’, ‘this Regulation’ or ‘EUDR’).

Certification bodies may choose whether to offer to evaluate the organizations’ conformity to the FSC Regulatory Module. However, if a certification body chooses to provide this evaluation, conformity with the requirements in <FSC-STD-20-001 General requirements for FSC accredited certification bodies>, <FSC-STD-20-007 Forest Management Evaluations>, <FSC-STD-20-001r Regulatory Module – General Requirements for Certification Bodies> and this standard addendum is mandatory.

All aspects of this standard addendum are considered normative, including the scope, effective and validity dates, references, terms and definitions, footnotes, graphics and tables unless otherwise stated. Notes, information boxes and examples are not considered normative.

B. REFERENCES

The following referenced documents are indispensable for the application of this document.

For references without a version number, the latest version of the referenced document (including any amendments) applies:

FSC-STD-20-001 V4-0	General Requirements for FSC Accredited Certification Bodies
FSC-STD-20-007 V4-0	Forest Management Evaluations
FSC-STD-20-001r	Regulatory Module – General Requirements for Certification Bodies

C. TERMS AND DEFINITIONS

For the purposes of this document, the terms and definitions included in <FSC-STD-01-002 FSC Glossary of Terms>, <FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship>, <FSC-STD-60-004 International Generic Indicators>, the applicable Forest Stewardship Standard, and the following apply:

Definitions of types of organizations

Downstream operator: an organization that, in the course of a commercial activity, places on the market or exports relevant products made using relevant products, all of which are covered by a due diligence statement or by a simplified declaration [Equivalent EUDR definition – Article 2(15b)].

NOTE: In this standard addendum, downstream operators are primarily relevant to requirements for communicating due diligence statement reference numbers, declaration identifiers, and information on non-conforming products further down the supply chain.

Micro or small primary operator (MSPO): a subcategory of an upstream operator subject to the simplified regime under Article 4a of the EUDR. It is the organization that:

- a) is a natural person, micro or small undertaking within the meaning of Article 3(1) and Article 3(2), first subparagraph, of Directive 2013/34/EU, irrespective of its legal form;
- b) is established in a country, or part thereof, classified as low risk in accordance with Article 29 of the EUDR;
- c) is in the course of a commercial activity, directly places relevant products on the EU market or exports relevant products from the EU; and
- d) places on the market or exports relevant products that the organization itself has grown, harvested, obtained from, or raised on relevant plots of land or, for cattle, on establishments located in that country.

NOTE 1: This definition can apply to the organizations established in or outside the EU [Equivalent EUDR definition – Article 2(15a)].

NOTE 2: An MSPO, as a subcategory of an upstream operator, remains responsible for ensuring that relevant products comply with Article 3 of the EUDR.

NOTE 3: In the case of group certification, MSPO status shall be assessed for the legal or natural person who places the relevant product on the market or exports it, unless otherwise clarified by the EUDR, competent authorities, or FSC. A cooperative, association or group entity may qualify as an MSPO only where it meets all elements of the MSPO definition, including producing the relevant products itself and directly placing them on the EU market or exporting them. Where it does not meet the MSPO definition, it may act as an authorized representative for members that qualify as operators, provided that it is established in the EU and acts in accordance with Article 6 of the EUDR.

Micro, small or medium-sized enterprise (or ‘SME’): a micro, small or medium-sized undertaking, irrespective of its legal form, within the meaning of Article 3(1), Article 3(2) first subparagraph, and Article 3(3) of Directive 2013/34/EU of the European Parliament and of the Council. The criteria outlined in the most up-to-date version of the Directive will prevail. At the time of publication of the FSC Regulatory Module, the criteria are as follows:

- “1. In applying one or more of the options in Article 36, Member States shall define micro-undertakings as undertakings which on their balance sheet dates do not exceed the limits of at least two of the three following criteria:*
 - a) *balance sheet total: EUR 450 000;*

- b) *net turnover: EUR 900 000;*
 - c) *average number of employees during the financial year: 10.*
2. *Small undertakings shall be undertakings which on their balance sheet dates do not exceed the limits of at least two of the three following criteria:*
- a) *balance sheet total: EUR 5 000 000;*
 - b) *net turnover: EUR 10 000 000;*
 - c) *average number of employees during the financial year: 50.*
3. *Medium-sized undertakings shall be undertakings which are not micro-undertakings or small undertakings and which on their balance sheet dates do not exceed the limits of at least two of the three following criteria:*
- a) *balance sheet total: EUR 25 000 000;*
 - b) *net turnover: EUR 50 000 000;*
 - c) *average number of employees during the financial year: 250.”*

Regulatory trader: an organization in the supply chain other than the upstream operator or downstream operator that, in the course of a commercial activity, makes relevant products available on the EU market.

NOTE: The EUDR uses the term ‘trader’ in Article 2(17). FSC uses the term ‘regulatory trader’ in this standard addendum to avoid confusion with the term ‘trader’ as used in other FSC normative documents.

Upstream operator: an organization that, in the course of a commercial activity, places relevant products on the European Union market or exports relevant products from the European Union, and that does not meet the definition of a downstream operator.

NOTE: The EUDR uses the term ‘operator’ in Article 2(15). In this standard addendum, ‘upstream operator’ refers to the equivalent EUDR role in order to distinguish it from the downstream operator and the regulatory trader.

Other Definitions

Agricultural use: use of land for the purpose of agriculture, including for agricultural plantations and set-aside agricultural areas, and for rearing livestock (Source: Regulation (EU) 2023/1115, Article 2(5) on deforestation-free products).

Authorized representative: any natural or legal person established in the EU who has received a written mandate from an upstream operator to act on their behalf in relation to specified tasks with regard to the upstream operator’s obligations under this standard addendum [Equivalent EUDR definition – Article 2(22)].

Degradation: changes within a natural forest or High Conservation Value area that significantly and negatively affect its species composition, structure and/or function, and reduces the ecosystem’s capacity to supply products, support biodiversity and/or deliver ecosystem services (Source: <FSC-POL-01-007 Policy to Address Conversion>).

Due diligence statement: a document confirming the implementation of a due diligence system by the upstream operator, which encompasses information collection, risk assessment and risk mitigation measures in accordance with the EUDR. The statement affirms that the operator has conducted due diligence to ascertain that either no risk or only a negligible risk has been identified concerning the compliance of the relevant products in adherence to Article 3, Article 4(2) and Article 8 of the EUDR.

Due diligence statement reference number: the reference number assigned to a due diligence statement that has been submitted to the European Commission’s Information System pursuant to Article 33 of the EUDR.

Due diligence system (DDS): a system of measures and procedures to minimize the risk of sourcing material from unacceptable sources. A DDS contains the following three elements: obtaining information, risk assessment, and risk mitigation (when needed).

Forest: a tract of land dominated by trees (Source: <[FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship](#)>).

Geolocation: geographical location of a plot of land described by means of latitude and longitude coordinates corresponding to at least one latitude and one longitude point and using at least six decimal digits [Equivalent EUDR definition– Article 2(28)].

Mitigation measure: an action that The Organization shall take to mitigate the risk of sourcing material from unacceptable sources.

Negligible risk: a conclusion, following a risk assessment, that there is no cause for concern either that material from a specific geographical area originates from unacceptable sources, or that material is mixed with non-eligible inputs or material with a different origin in such a way that would not allow the level of risk related to origin to be confirmed as negligible.

Non-negligible risk: a conclusion, following a risk assessment, that there is cause for concern that material from unacceptable sources may have been sourced or entered the supply chain from a specific geographical area. The nature and extent of this risk is specified for the purpose of defining efficient mitigation measures.

Plot of land: land within a single real estate property, as recognized by the law of the country of production, which enjoys sufficiently homogeneous conditions to allow an evaluation of the aggregate level of risk of deforestation and forest degradation associated with relevant commodities produced on that land [Equivalent EUDR definition – Article 2 (27)].

Regulatory Claim: a claim made on sales and delivery documents based on inputs that meet the requirements of <[FSC Regulatory Module](#)>. It can only be used in combination with the FSC claims (except FSC Recycled), e.g. FSC 100% / Regulatory.

Regulatory+ Claim: a claim made on sales and delivery documents based on inputs exclusively with an FSC 100% / Regulatory+ or FSC CFM / Regulatory+ Claim and where every upstream certificate holder within a fully verified supply chain has applied the <[FSC Regulatory Module](#)>. It can only be used in combination with the FSC 100% or FSC CFM claim.

Relevant legislation of the country of production: as defined in Article 2(40) of the EUDR, the laws applicable in the country of production concerning the legal status of the area of production in terms of:

- a) land use rights;
- b) environmental protection;
- c) forest-related rules, including forest management and biodiversity conservation, where directly related to wood harvesting;
- d) third parties' rights;
- e) labour rights;
- f) human rights protected under international law;
- g) the principle of free, prior and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples;
- h) tax, anti-corruption, trade and customs regulations.

Relevant products: ‘relevant products’ refers to products listed in Annex I of the Regulation (EU) 2023/1115.

Substantiated concern: a duly reasoned claim based on objective and verifiable information regarding non-compliance with this Regulation and which could require the intervention of competent authorities [Equivalent EUDR definition – Article 2(31)].

Supply area: the geographical area from which material is sourced. The supply area does not need to be defined as a single contiguous area; it may comprise multiple separate areas that span multiple political jurisdictions including countries or multiple forest types.

Verbal forms for the expression of provisions

[Adapted from *ISO/IEC Directives Part 2: Rules for the structure and drafting of International Standards*]

- 'shall': indicates requirements strictly to be followed in order to conform with the standard.
- 'should': indicates that among several possibilities one is recommended as particularly suitable, without mentioning or excluding others, or that a certain course of action is preferred but not necessarily required. A 'should requirement' can be met in an equivalent way provided this can be demonstrated and justified.
- 'may': indicates a course of action permissible within the limits of the document.
- 'can': is used for statements of possibility and capability, whether material, physical or causal.

D. ABBREVIATIONS

DDS	Due Diligence System
EU	European Union
EUDR	Regulation (European Union) 2023/1115 on Deforestation-free Products
EUR	Euro
FPIC	Free, Prior and Informed Consent
FSC	Forest Stewardship Council
ISO	International Organization for Standardization
ME	Main Evaluation
MSPO	Micro or Small Primary Operator
MU	Management Unit
SE	Surveillance Evaluation
RE	Re-evaluation
REG	Regulatory Claim
REG+	Regulatory+ Claim
SME	Micro, Small and Medium-sized Enterprise
UN	United Nations

ADDITIONAL ACCREDITATION REQUIREMENTS FOR FSC-STD-20-007 FOREST MANAGEMENT EVALUATIONS

1 Reporting requirements

- 1.1 Additional to the minimum mandatory content of the evaluation report and public summary in Annex 4 of <FSC-STD-20-007 Forest Management Evaluations>, the certification body shall register in the reports the information elements contained in Table 1 below (Annex 4 of FSC-STD-20-007; Article 12 of the EUDR).
- 1.2 The certification body shall evaluate that The Organization provides, upon request, access to information and records related to the implementation of the FSC Regulatory Module to the competent authorities responsible for the enforcement of Regulation (EU) 2023/1115 (the EUDR).
- 1.3 The certification body shall evaluate that The Organization maintains records related to the implementation of the due diligence system, including information used for risk assessment and mitigation, for a minimum period of five (5) years.

FSC REGULATORY MODULE

Table 1. Minimum mandatory content of the evaluation report and public summary for the FSC Regulatory Module

Information elements	Evaluation type			Upstream operators		Downstream operators or regulatory traders		Public summary
	ME	SE	RE	Non-MSPO	MSPO	Non-SMEs	SMEs	
77. A summary of the due diligence system, including at least: a) a summary of: i. relevant products; ii. the quantity of the relevant products; iii. the country of production;	x	x	x	x	x			x
iv. the geolocation of plots of land where the product was produced;	x	x	x	x				x
v.								
vi. the geolocation of plots of land where the product was produced, OR where applicable for micro or small primary operators submitting a simplified declaration, the postal address of the plots of land or establishment;	x	x	x		x			x

Information elements	Evaluation type			Upstream operators		Downstream operators or regulatory traders		Public summary
	ME	SE	RE	Non-MSPO	MSPO	Non-SMEs	SMEs	
vii. the date or time range of harvesting;	x	x	x	x	x			x
viii. businesses, operators, or traders to whom the relevant products have been supplied;	x	x	x	x	x	x	x	
ix. the reference to the due diligence statement, including the due diligence reference number and verification number where applicable;	x	x	x	x				x
x. where applicable, the declaration identifier associated with a simplified declaration submitted by a micro or small primary operator;	x	x	x		x			x
xi. the category of the evaluated entity under Regulation (EU) 2023/1115 (e.g. operator, micro or small primary operator, downstream operator, regulatory trader);	x	x	x	x	x	x	x	x
b) a description of the information and evidence obtained and used to assess the risk, the conclusions of the risk assessment and the measures implemented; and	x	x	x	x	x			x
c) a description of the process of consultation of Indigenous Peoples, local communities and other customary tenure rights holders or of the civil society organizations that are present in the area of production of the relevant products.	x	x	x	x	x			x
78. Date of the evaluation of conformity with the FSC Regulatory Module.	x	x	x	x	x	x	x	x
79. Audit findings related to the FSC Regulatory Module.	x	x	x	x	x	x	x	x

Information elements	Evaluation type			Upstream operators		Downstream operators or regulatory traders		Public summary
	ME	SE	RE	Non-MSPO	MSPO	Non-SMEs	SMEs	
80. A description of any conditions and subsequent actions taken by The Organization prior to the decision to correct major or minor nonconformities with the FSC Regulatory Module that had been identified.	x	x	x	x	x	x	x	x



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