



Interpretation

# INTERPRETATIONS OF THE NORMATIVE FRAMEWORK

Controlled Wood



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**Title:** Interpretations of the Normative Framework

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## TERMS AND DEFINITIONS

### 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.

## STANDARDS

### FSC-STD-40-005 (V2-1) STANDARD FOR COMPANY EVALUATION OF FSC CONTROLLED WOOD

<b>Code</b>	INT-STD-40-005_04 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_02)
<b>Requirement (s)</b>	Applies to all requirements where the CPI is mentioned
<b>Publication date</b>	6 September 2013
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_06
<b>Requirement (s)</b>	V2-1, Categories 2, 3, 4
<b>Publication date</b>	18 May 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_14 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_10)
<b>Requirement (s)</b>	V2-1, Clause 7.1
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_16 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_11)
<b>Requirement (s)</b>	V2-1, clause 9.1
<b>Publication date</b>	10 October 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_11 V2-1 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_07)
<b>Requirement (s)</b>	V2-1, Section 11
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_05 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_03)
<b>Requirement (s)</b>	V2-1, Clause 11.1
<b>Publication date</b>	5 February 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_18 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_12)
<b>Requirement (s)</b>	V2-1, Clause 13.2, Annex 3
<b>Publication date</b>	28 October 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_08 V2-1
<b>Requirement (s)</b>	V2-1, Section 14
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_09 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_05)
<b>Requirement (s)</b>	V2-1, Annex 1
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_15 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_04)
<b>Requirement (s)</b>	V2-1, Annex 1
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_13 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_09)
<b>Requirement (s)</b>	V2-1, Annex 1
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_10 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_06)
<b>Requirement (s)</b>	V2-1, Annex 1
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_12 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_08)
<b>Requirement (s)</b>	V2-1, Annex 2
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_07
<b>Requirement (s)</b>	V2-1, Annex 2, part B, Section 2
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_03
<b>Requirement (s)</b>	V2-1, Annex 2 and 3.
<b>Publication date</b>	4 May 2012
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_01
<b>Requirement (s)</b>	V2-1, Annex 2, A.3
<b>Publication date</b>	8 December 2011
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_17
<b>Requirement (s)</b>	V2-1, Annex 3
<b>Publication date</b>	28 October 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_02 (also published under FSC-STD-30-010 with code INT-STD-30-010_01)
<b>Requirement (s)</b>	V2-1, Annex 3
<b>Publication date</b>	31 January 2012
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_19
<b>Requirement (s)</b>	V2-1, Annex 4
<b>Publication date</b>	2 July 2015
<b>Status</b>	Withdrawn

## FSC-STD-40-005 (V3-0 and V3-1) REQUIREMENTS FOR SOURCING FSC CONTROLLED WOOD

<b>Code</b>	INT-STD-40-005_20
<b>Requirement (s)</b>	V3-0
<b>Publication date</b>	03 June 2016
<b>Status</b>	Withdrawn

<b>Code</b>	INT-STD-40-005_31 (also published under FSC-STD-20-011 with code INT-STD-20-011_21)
<b>Requirement (s)</b>	V3-1, Clause 2.1 FSC-STD-20-011 V4-2, Table B
<b>Publication date</b>	04 April 2024

**Does the organization need to review potential suppliers not currently included in their DDS as part of the summary of the findings for field verification?**

If the organization chose to exclude sites at the risk assessment stage, there is no requirement under FSC-STD-40-005 V3-1 to include this information in the summary of the DDS. Potential suppliers are not yet a part of the DDS. However, if field verification undertaken as a control measure resulted in one or more supply units, suppliers or sub-suppliers being excluded from the organization's DDS, this should be stated in the summary of the organization's findings required by <FSC-STD-40-005 V3-1> sub-clause 6.2(d), as this is effectively a control measure taken to address identified risk.

<b>Code</b>	INT-STD-40-005_27
<b>Requirement (s)</b>	V3-1, Clause 4.1
<b>Publication date</b>	02 December 2020

**When FSC CW Risk Assessments have recommended and/or mandatory control measures (CMs) that do not address all the specified risks identified in the Risk Assessment, would it be sufficient for the organization to only include those recommended or mandatory control measures in its Due Diligence System (DDS)?**

No. Control measures (CMs) provided in FSC Risk Assessments (recommended or mandatory) may not always be sufficient to adequately mitigate or avoid all types of risks included in the risk assessments. This may be because either

- a) There are no CMs to mitigate particular risks in specific situations, or
- b) the CMs provided in the FSC Risk Assessments are insufficient to mitigate or avoid the risk they are intended to mitigate or avoid.

In such situations, organizations shall establish and implement additional CMs to mitigate risks where required. Control measures established by the organization shall adhere to requirements 4.2 - 4.11 and 4.13 of <FSC-STD-40-005 V3-1>.

<b>Code</b>	INT-STD-40-005_30
<b>Requirement(s)</b>	V3-1, Clause 4.1
<b>Publication date</b>	28 March 2023

**To what extent must auditors further verify or corroborate expert opinions and statements? Is it necessary to additionally audit the evidence upon which conclusions of experts are based?**

No. Experts that meet the requirements of Annex C are deemed as sufficiently qualified to provide opinions/statements regarding the status of risk for controlled wood indicators. It is therefore not necessary to provide additional detailed corroborating evidence to the auditor that support the expert's conclusions.

However, if an auditor deems a statement provided by an expert to be unreasonable or comes across information contradicting the expert's conclusions, then additional corroborating evidence should be reviewed, and a non-conformity related to expert engagement may have to be issued.

<b>Code</b>	INT-STD-40-005_34 Implementation of recommended mitigation measures
<b>Requirement (s)</b>	V3-1, Clause 4.1, 4.12, 4.13 ADVICE-40-005-27
<b>Publication date</b>	01 July 2024

**Clauses 4.12 and 4.13 describe the requirements for mandatory 'mitigation measures' (former 'control measures') in an NRA. But how should recommended mitigation measures provided in FSC Risk Assessments be implemented?**

The organization should implement the recommended mitigation measures where indicated in the applicable approved FSC Risk Assessment developed according to <FSC-PRO-60-006b Risk Assessment Framework>.

Where alternative mitigation measures are used instead of recommended mitigation measures, the requirements in Clause 4.13 b) applies to the organization.

Conversely to mandatory mitigation measures, the organization is not required to inform the responsible body (for the development of the FSC Risk Assessment) if alternative mitigation measures are used.

NOTE: The term 'should' in this interpretation follows the definition provided in the box 'verbal forms for the expression of provisions' of <FSC-STD-40-005 V3-1 Requirements for Soucign FSC Controlled Wood Standard>.

<b>Code</b>	INT-STD-40-005_33 (also published under FSC-STD-20-011 V4-2 with code INT-STD-20-011_39 and FSC-DIR-40-005 with code INT-DIR-40-005_14)
<b>Requirement(s)</b>	V3-1, clause 4.14 FSC-STD-20-011 V4-2, clauses 6.2 and 6.17 ADVICE-40-005-24
<b>Publication date</b>	04 April 2024
<p><b>Are certificate holders required to verify the effectiveness/adequacy of the control measures (CMs) in Category 3 and 4 of the US NRA when controlling materials from areas of specified risk?</b></p> <p>No. The certificate holders sourcing material from areas of specified risk and implementing mandatory control measures based on the US National Risk Assessment (NRA) are not required to verify the effectiveness/ adequacy of the control measures in Category 3 and 4.</p> <p>However, certificate holders must document the data/ information related to the implemented measures. In order to achieve the intended goals outlined in the relevant US NRA Controlled Wood Regional Meeting Report as per &lt;<a href="#">FSC-NRA-US V1-0 FSC National Risk Assessment for the conterminous United States of America</a>&gt;, the certificate holders should also provide this information to their certification body upon request.</p>	

<b>Code</b>	INT-STD-40-005_21
<b>Requirement (s)</b>	V3-1 Clause 4.8, Annex B clause 1.2
<b>Publication date</b>	16 January 2018
<p><b>Is the organization required to undertake stakeholder consultation in advance of each and every forest management activity covered by the DDS, as per Annex B, Clause 1.2 (FSC-STD-40-005 V3-1)?</b></p> <p>No, the organization is not expected to conduct stakeholder consultation in advance of each and every forest management activity. The frequency of the consultations needs to occur at a rate adequate and proportionate to the risk caused by the management activity and shall be defined by the organization.</p>	

<b>Code</b>	INT-STD-40-005_28
<b>Requirement (s)</b>	V3-1, Clause 4.9
<b>Publication date</b>	02 December 2020
<p><b>When an organization is using an FSC Risk Assessment that includes recommended, mandatory, or both recommended and mandatory control measures (CMs) for specified risk in Category 2, Category 3, or both, do they still need to use the opinion of experts to justify the adequacy of the control measures?</b></p>	

No. If an organization is implementing the recommended or mandatory control measures (CMs) for Controlled Wood categories 2 and 3 from the applicable FSC Risk Assessment, then it does not need to use the opinion of experts to justify the adequacy of the CMs. This is because the CMs were developed with the involvement and consideration of experts in the FSC Risk Assessment process.

NOTE: Clause 4.9 is only applicable in the following situations:

1. an organization is using an Extended Company Risk Assessment (ECRA), or
2. an organization is using an NRA/CNRA that has not yet been approved by FSC, or
3. an organization is using a CNRA that does not state that they are following the FSC-PRO-60-002 and/or does not include the experts consulted, or
4. an organization chooses requirement 4.13 to develop their own control measures.

<b>Code</b>	INT-STD-40-005_29
<b>Requirement (s)</b>	V3-1, Clause 4.9 and 4.11.d)
<b>Publication date</b>	23 September 2022

**1) Is applying legislation a valid control measure confirming evidence of local communities and Indigenous Peoples engagement and that their requirements are met?**

**2) Does the sentence “evidence confirming that local communities and Indigenous Peoples are engaged, and their requirements are met” mean that:**

**a) Local communities and Indigenous Peoples are either included in the development of the control measures, or;**

**b) Control measures always include interaction with local communities and Indigenous Peoples?**

1) If the legislation requires the engagement of local communities and Indigenous Peoples and requires that their needs are met, then applying that legislation may be a valid control measure.

Regardless of whether legislation is being applied or not, the evidence must exist to demonstrate that local communities and Indigenous Peoples have accepted such engagement and that the result of the engagement meets their requirements.

2) Neither are required under all circumstances.

The sentence means that either:

1) The organization shall develop and implement control measures that lead to engagement and meeting the needs of local communities and Indigenous Peoples; or

2) The organization shall develop and implement control measures that find evidence that the local communities and Indigenous Peoples are engaged, and evidence that their requirements are met.

In case 1, the organization is generating the evidence confirming engagement and requirements being met. The frequency and timing of the engagement shall be adapted to ensure that the engagement on the needs and requirements is appropriate and that the needs of the local communities and Indigenous

Peoples are met. It does not always mean that local communities and Indigenous Peoples are involved in the development of the control measures.

In case 2, the organization is gathering evidence that local communities and Indigenous Peoples are engaged, and their needs met by another relevant entity (e.g., local government).

NOTE: Clause 4.9 is relevant for justifying the adequacy of the control measures (whether implementing legislation or not). This includes assessing the sufficiency of the engagement and the means to meet the requirements of local communities and Indigenous Peoples.

<b>Code</b>	INT-STD-40-005_22
<b>Requirement (s)</b>	V3-1, Annex A, Controlled Wood Category 3 Clause 3.9 Indicator 3.2
<b>Publication date</b>	16 January 2018
<p><b>When the organization conducts stakeholder consultation to demonstrate that there is significant support to low risk designation by relevant national/regional stakeholders from the assessed supply area, consulted stakeholders may not respond. Can a lack of response to stakeholder consultation demonstrate evidence of significant support?</b></p> <p>No, the lack of a response to stakeholder consultation cannot be considered as evidence for significant support. Support to a low risk designation needs to be demonstrated by an affirmative and positive response from the stakeholders.</p>	

<b>Code</b>	INT-STD-40-005_26
<b>Requirement (s)</b>	V3-1, Annex A, Clause 3.9 Indicator 3.2d
<b>Publication date</b>	16 January 2018
<p><b>What constitutes a ‘substantial objection’ from relevant national or regional stakeholders against a low risk designation according to &lt;FSC-STD-40-005 V3-1&gt; Annex A, Clause 3.9, Indicator 3.2d?</b></p> <p>A ‘substantial objection’ against a low risk designation shall be expressed as an objection and specifies a ‘threat’ caused by forest management activities to the HCV(s). Verifiable evidence or reference to such shall be provided in the objection.</p>	

<b>Code</b>	INT-STD-40-005_23
<b>Requirement (s)</b>	V3-1, Annex A
<b>Publication date</b>	16 January 2018
<p><b>&lt;FSC-STD-40-005 V3-1&gt; Annex A Controlled Wood Category 3, Clause 3.9 (Examples of sources of information Indicator 3.1) reads:</b></p> <p><b><i>‘Forest, woodland, or mangrove ecoregions identified by World Wildlife Fund as a Global 200 Ecoregion and assessed by WWF as having a conservation status of endangered or critical. If</i></b></p>	

***the Global 200 Ecoregion comprises more than a single terrestrial ecoregion, an ecoregion within the Global 200 Ecoregion can be considered low risk if the sub-ecoregion has a Conservation Status other than ‘critical’ or ‘endangered’ ([www.worldwildlife.org/science/wildfinder](http://www.worldwildlife.org/science/wildfinder)).***

The use of the word “and” has limited the requirement to Global 200 ecoregions which are also assessed by WWF as having a conservation status of endangered or critical. Otherwise the word “or” would have been used. Therefore, does a region that has been evaluated by WWF as critically endangered no longer needs to be considered as potentially HCVF, unless it is also a Global 200 Region.

The standard requires consideration of ‘ecoregionally significant HCVs’ and does not limit the recognition of ecoregions to Global 200 ecoregions. General references provided in the standard direct to WWF sources without limitation to Global 200 ecoregions (FSC-STD-4005, Annex 1, definition of ecoregion). Therefore, information about threatened ecoregions other than the examples provided in FSC-STD-40-005 V3-1 should be taken into account. The organization shall not ignore known and available sources of information in addition to the ones listed in normative documents.

<b>Code</b>	INT-STD-40-005_35 (also published under FSC-STD-40-004 with code INT-STD-40-004_71; FSC-STD-01-004 with code INT-STD-01-004_08)
<b>Requirement (s)</b>	V3-1, Annex A, Clause 3.6 FSC-STD-40-004, V3-1, Clause 6.1 FSC-STD-01-004 V1-0, Terms and Definitions; Clause 1.1.1 b) FSC-STD-40-004r V1-0, C. Terms and Definitions FSC-STD-01-001 V5-3, Criterion 1.5 FSC-STD-60-004 V2-1, Annex A
<b>Publication date</b>	1 July 2024; Updated 1 April 2025.

**Is compliance with the relevant legislation of the country of production as per EUDR covered by FSC requirements?**

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.

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.

<b>Code</b>	INT-STD-40-005_25
<b>Requirement (s)</b>	V3-1, Annex B
<b>Publication date</b>	16 January 2018

**Can an FSC network partner provide a stakeholder list to be used by organizations and certification bodies for stakeholder consultations?**

Yes. An FSC network partner can develop a list of relevant stakeholders to be used by organizations and certification bodies for stakeholder consultations. The consent of the stakeholders for participating in consultations and for making their names public shall be obtained before their names are included in this list.

The stakeholder list developed shall be for the purpose of guidance only, unless published in FSC-PRO-60-002b by FSC, in which case the list shall be mandatory in the certification process upon publication. The list is not exhaustive and the organization is responsible for the identification of affected and interested stakeholders.

<b>Code</b>	INT-STD-40-005_32 (also published under FSC-STD-20-011 with code INT-STD-20-011_22)
<b>Requirement(s)</b>	V3-1, Annex E FSC-STD-20-011 V4-2, Clause 7.2
<b>Publication date</b>	04 April 2024

**If the organization develops a control measure based on a desk evaluation, can the certification body apply evaluation of control measures at the forest level if the examples in Annex E Table B suggest that a field-based control measure should have been developed?**

FSC-STD-40-005 V3-1 Section 4 (Risk mitigation) does not specify the type of control measures that shall be established by the organization. FSC-STD-40-005 V3-1 Annex E is informative, and contains guidance and examples, not normative requirements. However, when field-based control measures have been designed by the certification body in the system for evaluating the relevance, effectiveness, and adequacy of the DDS, according to Clause 6.2, then the certification body can apply evaluation of the control measures at the field level.

<b>Code</b>	INT-STD-40-005_24 (also published under FSC-STD-30-010 V2-0 with code INT-STD-30-010_11)
<b>Requirement (s)</b>	V3-1
<b>Publication date</b>	16 January 2018, amended on 02 September 2021

**In the CW/FM standard, under High Conservation Value Forests (HCVFs), what is the definition of ‘old-growth forest’ in the Australian context? What is the minimum area for determination of ‘old-growth forest’?**

FSC-STD-AUS-01-2018 *FSC National Forest Stewardship Standard of Australia* and the Australian *The High Conservation Values (HCVs) Evaluation Framework - For the use of implementing Controlled Wood standards* Version 2-0 (2021) have defined ‘old-growth forest’ as:

“Ecologically mature forest where the effects of disturbances are now negligible.”

Where ‘mature forest’ is defined as:

“forests that contain overstorey trees typically greater than 100 years old and beginning to develop structural features typically found in older forests, including large spreading crowns, tree hollows and stages of senescence.”

In addition, FSC-STD-AUS-01-2018 *FSC National Forest Stewardship Standard of Australia* has provided the following guidance:

“Identification and assessment of HCV 3.3 [old-growth forest] should include consideration of:

- a. The degree to which it is rare and/or threatened at a global, national or regional level
- b. Its distinctiveness in terms of size and quality (including stand structural characteristics and ecological functions) in a landscape level context
- c. Geographic range.

Determining these shall be based on assessments by government agencies, peer reviewed literature, or assessments by recognised experts, and be considered at the landscape level.”

In the absence of a specific definition of old-growth forest in FSC-STD-30-010 V2-0 *FSC Controlled Wood Standard for Forest Management Enterprises* , the above definitions and guidance shall be followed to identify and assess old-growth forest in the Australian context.

Regarding the minimum area for determining old-growth forest, the Australian *The High Conservation Values (HCVs) Evaluation Framework - For the use of implementing Controlled Wood standards* Version 2-0 (2021) states that “The minimum area for Old Growth is as per the definition for Minimum Threshold for HCV Areas.”

Where the definition of ‘minimum area threshold for HCV Areas’ specifies that “In the identification of HCV Areas, the minimum size threshold will be the smallest area in which the viability and integrity of that particular designation can be maintained, based on the best available scientific information, including recognised government and expert definitions and research.”

## DIRECTIVES

### FSC-DIR-40-005 FSC DIRECTIVE ON FSC CONTROLLED WOOD

<b>Code</b>	INT-DIR-40-005_02 (also published under FSC-STD-40-005 with code INT-STD-40-005_04 and under FSC-STD-20-011 with code INT-STD-20-011_07)
<b>Requirement (s)</b>	Applies to all requirements where the CPI is mentioned
<b>Publication date</b>	6 September 2013
<b>Status</b>	Withdrawn

<b>Code</b>	INT-DIR-40-005_04 (also published under FSC-STD-40-005 with code INT-STD-40-005_15)
<b>Requirement (s)</b>	ADVICE-40-005-01
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-DIR-40-005_06 (also published under FSC-STD-40-005 with code INT-STD-40-005_10)
<b>Requirement (s)</b>	ADVICE-40-005-01
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-DIR-40-005_11 (also published under FSC-STD-40-005 with code INT-STD-40-005_16)
<b>Requirement (s)</b>	ADVICE-40-005-04
<b>Publication date</b>	10 October 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-DIR-40-005_12 (also published under FSC-STD-40-005 with code INT-STD-40-005_18)
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<b>Requirement (s)</b>	ADVICE-40-005-07
<b>Publication date</b>	28 October 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-DIR-40-005_05 (also published under FSC-STD-40-005 with code INT-STD-40-005_09)
<b>Requirement (s)</b>	ADVICE 40-005-07, ADVICE 40-005-02
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-DIR-40-005_03 (also published under FSC-STD-40-005 with code INT-STD-40-005_05)
<b>Requirement (s)</b>	ADVICE-40-005-07
<b>Publication date</b>	5 February 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-DIR-40-005_01
<b>Requirement (s)</b>	ADVICE-40-005-07
<b>Publication date</b>	16 July 2010
<b>Status</b>	Withdrawn

<b>Code</b>	INT-DIR-40-005_13
<b>Requirement (s)</b>	ADVICE-40-005-09
<b>Publication date</b>	2 March 2015
<b>Status</b>	Withdrawn

<b>Code</b>	INT-DIR-40-005_08 (also published under FSC-STD-40-005 with code INT-STD-40-005_12)
<b>Requirement (s)</b>	ADVICE-40-005-09, Clause 3 (Advice)
<b>Publication date</b>	9 July 2014
<b>status</b>	Withdrawn

<b>Code</b>	INT-DIR-40-005_10 (also published under FSC-STD-40-005 with code INT-STD-40-005_14)
<b>Requirement (s)</b>	ADVICE-40-005-17
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-DIR-40-005_09 (also published under FSC-STD-40-005 with code INT-STD-40-005_13)
<b>Requirement (s)</b>	ADVICE-40-005-18
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-DIR-40-005_07 (also published under FSC-STD-40-005 with code INT-STD-40-005_11)
<b>Requirement (s)</b>	ADVICE-40-005-19
<b>Publication date</b>	9 July 2014
<b>Status</b>	Withdrawn

<b>Code</b>	INT-DIR-40-005_14 (also published under FSC-STD-20-011 V4-2 with code INT-STD-20-011_39 and FSC-STD-40-005 with code INT-STD-40-005_33 )
<b>Requirement(s)</b>	ADVICE-40-005-24 FSC-STD-40-005 V3-1, clause 4.14 FSC-STD-20-011 V4-2, clauses 6.2 and 6.17
<b>Publication date</b>	04 April 2024

**Are certificate holders required to verify the effectiveness/adequacy of the control measures (CMs) in Category 3 and 4 of the US NRA when controlling materials from areas of specified risk?**

No. The certificate holders sourcing material from areas of specified risk and implementing mandatory control measures based on the US National Risk Assessment (NRA) are not required to verify the effectiveness/ adequacy of the control measures in Category 3 and 4.

However, certificate holders must document the data/ information related to the implemented measures. In order to achieve the intended goals outlined in the relevant US NRA Controlled Wood Regional Meeting Report as per <[FSC-NRA-US V1-0 FSC National Risk Assessment for the conterminous United States of America](#)>, the certificate holders should also provide this information to their certification body upon request.



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