Standard Addendum

FSC REGULATORY MODULE – CONTROLLED FOREST MANAGEMENT

FSC-STD-30-010r V1-1

FORESTS FOR ALL FOREVER™

FSC

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V 1-0	Initial version	1 April 2025
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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 the 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, and Controlled Wood Certification can **voluntarily** choose to also become certified against the Regulatory Module.

Using the FSC Regulatory Module

The Regulatory Module benefits the organizations by translating the EUDR's legislative requirements into certification requirements. This is useful for the organizations required to comply with the EUDR on top of their existing certification, including the 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 EU 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 regarding 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.

TABLE OF CONTENTS

A. SCOPE

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

Organizations choosing to apply this standard addendum shall demonstrate conformity with <FSC-STD-30-010 V3-0 Controlled Forest Management> and all applicable requirements of this standard addendum according to the scope of their FSC certification, and according to their type of organization as per Regulation (EU) 2023/1115. The FSC Regulatory Module is not available for use in conjunction with <FSC-STD-30-010 V2-0 FSC Controlled Wood Standard for Forest Management Enterprises>.

Which product groups does this standard addendum apply to?

This standard addendum focuses on wood and rubber. If other commodities falling under the scope of Regulation (EU) 2023/1115, such as cocoa or coffee, are included in the scope of FSC certification, The Organization is also required to demonstrate conformity for these commodities.

NOTE: Depending on its role in the supply chain, The Organization may act as an operator placing products on the EU market or provide information required by downstream operators in accordance with Regulation (EU) 2023/1115.

How to read this standard addendum?

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

B. REFERENCES

The following referenced document is 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-30-010 V3-0	Controlled Forest Management

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 nonconforming 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. in the course of a commercial activity, directly places relevant products on the European Union market or exports relevant products from the European Union; 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 organizations established in or outside the European Union [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 European Union 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 European Union 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 EU market or exports relevant products from the EU, 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: Article 2(5) of Regulation (EU) 2023/1115 on deforestation-free products).

Authorized representative: any natural or legal person established in the European Union who, in accordance with Article 6 of the EUDR, has received a written mandate from an upstream operator to submit a due diligence statement or simplified declaration on behalf of that upstream operator. The upstream operator retains responsibility for compliance of the relevant product with Article 3 of the EUDR.

NOTE: Where the upstream operator is a natural person or a microenterprise, the next downstream operator or regulatory trader further down the supply chain that is not a natural person or microenterprise may act as an authorized representative under Article 6(3) of the EUDR. The operator retains responsibility for conformity of the relevant product with Article 3 of the EUDR.

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.

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 the <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% claim 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 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 (Source: <FSC-STD-40-005 Requirements for Sourcing FSC Controlled Wood>).

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

CFM	Controlled Forest Management
DDS	Due Diligence System
EC	European Commission
EEC	European Economic Community
EORI	Economic Operators Registration and Identification
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
MSPO	Micro or Small Primary Operator
MU	Management Unit
REG	Regulatory Claim
REG+	Regulatory+ Claim
SME	Micro, Small and Medium-sized Enterprise
UN	United Nations

E. CLAUSES APPLICABLE TO DIFFERENT ORGANIZATIONS

Informative guidance

This standard addendum includes additional requirements to FSC Controlled Forest Management Certification for conformity with the FSC Regulatory Module. It covers due diligence, involving activities such as information collection, risk assessment, risk mitigation measures and creating due diligence statements, scenarios for simplified due diligence and how to deal with non-compliances.

How to find applicable requirements

Not all requirements in this standard addendum apply to all organizations. The Organization shall identify its role for each relevant product and product group, based on the definitions in Section C. 'Terms and Definitions'.

The Organization may have different roles for different relevant products, product groups, transactions, or positions in the supply chain. Where The Organization has more than one role, it shall apply all requirements applicable to each role.

For the purposes of Table 1:

1) 'Upstream operators – Non-MSPO' refers to The Organization that is an upstream operator and does not qualify as a micro or small primary operator.
2) 'Upstream operators – MSPO' refers to The Organization that qualifies as a micro or small primary operator.

Where The Organization also acts as a downstream operator or regulatory trader for products outside the scope of its forest management certification, the applicable requirements are addressed under <FSC-STD-40-004r FSC Regulatory Module – Chain of Custody Certification>.

Below is the icon key to assess the applicability of a particular requirement under this standard addendum.

Key		
✓	=	Applicable
*	=	Conditional/partially applicable
✕	=	Not applicable
-	=	Not applicable

Organizations falling outside the scope of the EUDR but opting for the use of the FSC Regulatory Module are required to select their relevant organization type. However, they are not required to conform with all the requirements of this standard addendum. Non-applicable clauses are identified in Annex 1.

Table 1. Applicability of requirements to organization types

FSC-STD-30-010r		Upstream operators	
		Non-MSPO	MSPO
1. Due Diligence – Implementation and Maintenance	1.1	✓	✓
	1.2	✓	*
	1.3	✓	✓
	1.4	✓	✓
	1.5	✓	✓

FSC-STD-30-010r		Upstream operators	
		Non-MSPO	MSPO
2. Due Diligence System – Obtaining information on input material	2.1	✓	✓
	2.2	✓	✓
	2.3	✓	✓
3. Due Diligence System – Risk Assessment	3.1	✓	*
	3.1.1	✓	*
	3.1.2	✓	*
	3.2	✓	*
	3.3	✓	*
4. Due Diligence System – Risk Mitigation	4.1	✓	*
	4.2	✓	*
	4.3	✓	*
	4.4	✓	✕
	4.5	✓	*
	4.6	✓	*
5. Due Diligence Statement	5.1	✓	✓
	5.2	✓	✓
	5.3	✓	✓
	5.4	✓	✓
	5.5	✓	✓
6. Simplified Due Diligence	6.1	✓	*
	6.2	*	*
	6.3	✓	*
	6.4	✓	*
7. Non-Compliances	7.1	✓	✓
	7.2	✓	✓
	7.3	✓	✓

1 Due diligence – implementation and maintenance

1.1 Due diligence is exercised on the products covered by the scope of this standard addendum before the product is placed on the European Union market, or exported from the European Union, in order to demonstrate that the product:

a) is deforestation-free;
b) has been produced in accordance with the relevant legislation of the country of production;
c) is covered by a due diligence statement or, where The Organization qualifies as a micro or small primary operator (MSPO), by a simplified declaration [Clause 11 of FSC-STD-30-010; Article 8(1) of the EUDR].

NOTE: For MSPO, the simplified declaration is a reporting simplification and does not remove The Organization's responsibility to ensure that relevant products comply with this standard addendum and Article 3 of the EUDR.

1.2 For The Organization operating in a country or parts thereof classified as high or standard risk in accordance with the EUDR three-tier risk system, due diligence includes:

a) the collection of information, data and documents as required by Section 2;
b) risk assessment as required by Section 3; and
c) risk mitigation measures as required by Section 4 [Clause 11 of FSC-STD-30-010; Article 8(2) of the EUDR].

NOTE 1: When the management unit (MU) is located in a country or parts thereof classified as low risk in accordance with the EUDR three-tier risk system, a simplified due diligence may be conducted (see Section 06).

NOTE 2: The MSPO are, by definition, established in low-risk countries. They are generally not required to conduct risk assessment and risk mitigation under Sections 3 and 4, unless The Organization obtains or is made aware of relevant information, including substantiated concerns, indicating a non-negligible risk that the product does not conform with this standard addendum or the EUDR.

1.3 A framework of procedures and measures, referred to as a 'due diligence system', is established and kept up to date to ensure that a relevant product placed on the market or exported is:

a) deforestation-free;
b) produced in accordance with the relevant legislation of the country of production;
c) covered by a due diligence statement or, where The Organization qualifies as an MSPO, by a simplified declaration [Clause 11 of FSC-STD-30-010; Article 12(1) of the EUDR].

NOTE: <FSC-STD-30-010 V3-0 Controlled Forest Management> and this standard addendum provide the framework of procedures and measures needed to fulfill the requirements under Clause 1.3.

1.4 The due diligence system is reviewed at least once a year and updated if there are new developments or changes that may affect the relevance, effectiveness, or adequacy of the due diligence system [Clause 11 of FSC-STD-30-010; Article 12(2) of the EUDR].

NOTE: Relevant new information, including substantiated concerns, is addressed through the applicable requirements on risk assessment, risk mitigation, simplified due diligence, and non-compliances in Sections 3, 4, 6, and 7.

1.5 Records of due diligence system reviews, updates, and supporting decisions are kept for five years and made available to the competent authorities upon request [Clause 11 of FSC-STD-30-010; Article 12(2) of the EUDR].

2 Due diligence system – obtaining information on input material

2.1 The following information, accompanied by evidence, for each product in the scope of the FSC Regulatory Module is collected, organized and kept for five years from the date of sale of the product:

a) a description, including the trade name and type of product, and in the case of wood the common and full scientific name of each species;

b) the quantity of the product expressed in:

i. for relevant products entering or leaving the European Union: kilogrammes of net mass and, where applicable, in the supplementary unit set out in Annex I to Council Regulation (EEC) No. 2658/87 against the indicated Harmonized System code; or

ii. in all other cases: in net mass or, where applicable, volume or number of items;

NOTE: A supplementary unit is applicable where it is defined consistently for all possible subheadings under the Harmonized System code referred to in the due diligence statement or, where applicable, provided as part of the simplified declaration.

c) the country of production, and where relevant, parts thereof;

d) the geolocation of all plots of land where the relevant commodities were produced, or where The Organization qualifies as a micro or small primary operator, either:

i. the geolocation of all plots of land where the relevant commodities were produced; or

ii. the postal address of all plots of land where the relevant commodities were produced, provided that the postal address clearly corresponds to the geographic location of the plots of land concerned;

e) the date or time range of harvesting (period defined by a start date and end date);

f) the name, postal address and email address of any business or person from whom The Organization has been supplied with relevant products, and where applicable name, postal address and email address of any business, downstream operator or trader to whom The Organization has supplied relevant products;

g) the FSC public summary report demonstrating conformity with the applicable <FSC-STD-30-010 V3-0 Controlled Forest Management> standard and the FSC Regulatory Module, together with applicable records where necessary, which serves as adequately conclusive and verifiable information that:

i. the product is deforestation-free;

ii. the product has been produced in accordance with the relevant legislation of the country of production, including any arrangement conferring the right to use the respective area for the purposes of the production [Clause 11.2 of FSC-STD-30-010; Article 9(1) of the EUDR].

2.2 Where geolocation is used, and where a plot of land is larger than four (4) hectares, the geolocation is compiled using polygons with sufficient latitude and longitude points to describe the perimeter of each plot of land [Clause 11 of FSC-STD-30-010; Article 2(28) of the EUDR].

2.3 Where geolocation is used, and where a plot of land is four (4) hectares or less, the geolocation is compiled using a polygon or a single point of latitude and longitude of six decimal digits [Clause 11 of FSC-STD-30-010; Article 2(28) of the EUDR].

NOTE 1: A plot of land may be the whole real estate property or only the area of production within that property, provided that the area has sufficiently homogeneous conditions to allow the risk of deforestation and forest degradation to be evaluated. Any deforestation or forest degradation on the declared plot of land disqualifies the relevant commodities and products from that plot from being placed on the market or exported.

2.4 Where The Organization qualifies as an MSPO, and uses the postal address option under requirement 2.1 d) of this standard addendum, The Organization shall collect, organize, and keep evidence demonstrating that the postal address:

a) clearly corresponds to the geographic location of all plots of land where the relevant commodity was produced;
b) is linked to the certified MU and the relevant source of origin or logging block; and
c) is linked to the product, species, quantity and date or time range of harvesting.

[Criterion 8.5 of FSC-STD-60-004; Article 4a(5) and Article 9(1)(d) of the EUDR.]

2.5 The Organization is required to verify and be able to demonstrate that the geolocation or, where applicable, the postal address collected under requirement 2.1 d) of this standard addendum is correct. Where The Organization cannot verify the required plot of land information, the product shall not be sold with the Regulatory+ claim, placed on the market, or exported as conforming with this standard addendum [Criterion 8.5 of FSC-STD-60-004; Article 4(4), Article 8, and Article 9(1)(d) of the EUDR].

3 Due diligence system – risk assessment

Applicability note: This section applies where a risk assessment is required under this standard addendum. This section does not apply where The Organization validly exercises simplified due diligence under Section 6 of this standard addendum, or where The Organization qualifies as an MSPO, unless The Organization obtains or is made aware of relevant information, including substantiated concerns, indicating that the product may not conform with this standard addendum or the EUDR, or that there is a risk of circumvention or mixing with products of unknown origin or nonconforming products.

3.1 The information collected as per Clause 2.1 of this standard addendum and any other relevant documentation is verified and analysed, and based on this information and documentation a risk assessment is conducted to determine whether there is a risk that the product intended to be sold or exported:

a) is not deforestation-free and;
b) has not been produced in accordance with the relevant legislation of the country of production [Clause 11 of FSC-STD-30-010; Article 10(1) of the EUDR].

3.1.1 The risk associated with each indicator in Annex 3 of this standard addendum is assessed and categorized as ‘negligible’ or ‘non-negligible’, accompanied by a description of the risk and applicable references [Clause 11 of FSC-STD-30-010; Article 10(1) of the EUDR].

NOTE: Conformity with the relevant clauses of the controlled forest management standard specified in Annex 3 of this standard addendum may be considered by The Organization as sufficient evidence of negligible risk for the corresponding indicator, provided that no relevant information, including substantiated concerns, indicates a non-negligible risk.

3.1.2 The risk assessment may be conducted using the simplified risk assessment template provided by FSC [Clause 11 of FSC-STD-30-010; Article 10(1) of the EUDR].

NOTE 1: The simplified risk assessment template outlines how FSC controlled forest management certification requirements address the risk indicators listed in Annex 3 of this standard addendum. It is prefilled with the risk designation and description provided there is conformity with the relevant FSC requirements.

NOTE 2: When an FSC Risk Assessment of the respective country according to <FSC-PRO-60-006b V2-0 FSC Risk Assessment Framework> for the area under assessment exists, it may be used to identify the risk designation for indicators not covered by controlled forest management certification requirements.

NOTE 3: Where relevant information, including substantiated concerns, indicates possible nonconformity, The Organization shall review whether the prefilled risk designation remains valid for the product, MU, plot of land, source of origin, or logging block concerned.

3.2 The risk assessment is documented and reviewed at least annually and whenever new information, changes in the MU, sourcing area, supply chain, risk classification, FSC Risk Assessment substantiated concerns, or other relevant development may affect the risk conclusions, the continued accuracy and relevance of risk designations is to be verified and revised if necessary [Clause 11 of FSC-STD-30-010; Article 10(4) of the EUDR].

3.3 The information referred to in Clause 3.1 of this standard addendum and the risk assessment is made available to competent authorities upon request [Clause 11 of FSC-STD-30-010; Article 10(4) of the EUDR]

4 Due diligence system – risk mitigation

Applicability note: This section applies where a risk assessment conducted under Section 3 identifies a non-negligible risk. This section does not apply where The Organization validly exercises simplified due diligence under Section 6 of this standard addendum, or where The Organization qualifies as an MSPO, unless The Organization obtains or is made aware of relevant information, including substantiated concerns, indicating that the product may not conform with this standard addendum or the EUDR, or that there is a risk of circumvention or mixing with products of unknown origin or nonconforming products.

4.1 When a non-negligible risk is identified as per Section 3 of this standard addendum, The Organization shall establish and implement effective risk mitigation measures to achieve no or only a negligible risk before placing the product on the market or exporting the product with the Regulatory+ claim [Clause 11 of FSC-STD-30-010; Article 11(1) of the EUDR].

NOTE: Risk mitigation procedures and measures may include the closure of relevant nonconformities identified or the prohibition of placing the product with the relevant claim on the market or exporting it.

4.2 Adequate and proportionate policies, controls and procedures to mitigate and effectively manage the risks of nonconformity of the product are in place [Clause 11 of FSC-STD-30-010; Article 11(2) of the EUDR].

4.3 Policies, controls and procedures as per Clause 4.2 of this standard addendum include model risk management practices, reporting, record keeping, internal control and compliance management [Clause 11 of FSC-STD-30-010; Article 11(2) of the EUDR].

NOTE: The Organization may use the FSC Controlled Forest Management Certification and this standard addendum to support conformity with Clauses 4.2 and 4.3 of this standard addendum, particularly the requirements to develop, implement and monitor a management plan. Public summaries of the evaluation reports, the simplified risk assessment template, and other elements also contribute to risk management practices, reporting, record keeping, internal control and compliance management.

4.4 For Organizations not qualifying as SMEs, policies, controls and procedures as per Clause 4.2 of this standard addendum include:

a) the appointment of a compliance officer at the management unit level;
b) an independent audit function to verify the internal policies, controls and procedures [Clause 11 of FSC-STD-30-010; Article 11(2) of the EUDR].

NOTE: The FSC Controlled Forest Management Certification provides an evaluation function by independent certification bodies, fulfilling the requirements under Claude 4.4.b) of this standard addendum.

4.5 Decisions on risk mitigation procedures and measures are documented and reviewed at least annually, revised if necessary, and made available to the competent authorities upon request [Clause 11 of FSC-STD-30-010; Article 11(3) of the EUDR].

4.6 The Organization shall be able to demonstrate how decisions on risk mitigation procedures and measures have been taken [Clause 11 of FSC-STD-30-010; Article 11(3) of the EUDR].

NOTE: The Organization may use the simplified risk assessment template provided by FSC to demonstrate how decisions on risk mitigation measures have been taken.

5 Due diligence statement and simplified declaration

5.1 A due diligence statement in accordance with Annex 2A 'Due Diligence Statement', or where The Organization qualifies as an MSPO, a one-time simplified declaration in accordance with Annex 2B 'Simplified Declaration' is submitted by The Organization to the information system established by the European Commission when due diligence has been exercised in accordance with Clause 1.1 of this standard addendum and allows The Organization to conclude that the product is deforestation-free and has been produced in accordance with the relevant legislation of the country of production prior to:

a) placing the product on the market or exporting it;
b) selling the product with the Regulatory+ claim [Clause 11 of FSC-STD-30-010; Article 4(2) of the EUDR].

5.2 The Organization shall not sell the product with the Regulatory+ claim, place it on the market, or export it until the applicable due diligence statement reference number or declaration identifier has been assigned.

NOTE: Where all information required for the simplified declaration is available in a system or database established under Union or Member State law and a declaration identifier has been assigned to The Organization, The Organization may rely on that declaration identifier instead of submitting a separate simplified declaration.

5.3 Records of due diligence statements, and simplified declarations, where applicable, submitted in accordance with Clause 5.1 of this standard addendum are kept for five years from the date of submission.

5.4 When an authorized representative is mandated to submit the due diligence statement or simplified declaration on behalf of The Organization, it is required to ensure that the following information is made available by the representative to the competent authorities upon request.

a) a copy of the mandate in an official language of the European Union;
b) a copy in an official language of the member state in which the due diligence statement or simplified declaration is handled or, where that is not possible, in English [Clause 11 of FSC-STD-30-010; Article 6 of the EUDR].

NOTE: If The Organization is a natural person or microenterprise, The Organization may mandate the next organization further down the supply chain that is not a natural person or a microenterprise to act as an authorized representative.

5.5 Sales invoices or similar documentation are kept for a minimum of five years for all products sold with a FSC Regulatory+ claim, including at minimum the information required under Clause 11 and the following requirements:

a) a description, including the trade name and type of product, and in the case of wood the common name of the species, and their full scientific name;
b) the quantity of the product expressed in:

i. for relevant products entering or leaving the European Union market: kilogrammes of net mass and, where applicable, in the supplementary unit set out in Annex I to Council Regulation (EEC) No. 2658/87 against the indicated Harmonized System code;

ii. in all other cases, net mass or, where applicable, volume or number of items.

c) the Regulatory+ claim identifying products sold in conformity with this standard addendum (i.e. FSC CFM / Regulatory+);

d) the reference number(s) of due diligence statements, or declaration identifiers associated with simplified declarations, where applicable, is/are quoted for the product [Clause 11 of FSC-STD-30-010; Article 9(1) of the EUDR].

NOTE: Inclusion of the due diligence statement reference number or declaration identifier in sales invoices or similar documentation is an FSC Regulatory+ claim control requirement. For customs purposes, the EUDR requires the reference number or declaration identifier to be made available to customs authorities for relevant products entering or leaving the European Union market, except where the exporter is a downstream operator.

5.6 The information necessary to demonstrate that due diligence was exercised and no risk or only a negligible risk was found, including the reference numbers of the due diligence statements or declaration identifiers associated with simplified declarations, where applicable, associated to the products, shall be shared with operators and traders further down the supply chain upon request when applicable [Clause 11 of FSC-STD-30-010; Article 4(7) of the EUDR].

NOTE 1: Operators, including MSPOs, are required under the EUDR to communicate the due diligence statement reference number or declaration identifier to the first downstream operators and regulatory traders, where applicable.

NOTE 2: The EUDR does not require operators to communicate verification numbers or additional due diligence information to clients. Any additional information provided for FSC Regulatory+ claim verification shall be limited to what is necessary to substantiate the claim and shall respect applicable confidentiality, data protection, and competition law requirements.

NOTE 3: Downstream operators and regulatory traders are not required under the EUDR to proactively assess whether their supplier is an operator, or to request a due diligence statement reference number or declaration identifier, unless they are aware that their supplier is an upstream operator. Where they receive a due diligence statement reference number or declaration identifier from an operator, they shall collect and retain it in accordance with their applicable EUDR obligations.

5.7 Where The Organization qualifies as an MSPO, The Organization ensures that the simplified declaration or, where applicable, the declaration identifier assigned in accordance with Article 4a(4) of the EUDR is applicable to the products sold with the FSC Regulatory+ claim, placed on the European Union market, or exported from the European Union.

5.7.1 Where major changes affect the information provided in the simplified declaration, The Organization updates the information in the simplified declaration, or submits a new simplified declaration where required by the European Commission’s Information System, the competent authority, or the applicable law. Major changes may include changes to the relevant products, Harmonized System codes, estimated annual quantity, plots of land, establishments, postal addresses, geolocations, country of production, or MSPO eligibility.

5.7.2 Where all information required for the simplified declaration is available in a system or database established under Union or Member State law, The Organization is not required to submit a separate one-time simplified declaration. In such cases, The Organization ensures that a declaration identifier has been assigned before the product is sold with the FSC Regulatory+ claim, placed on the European Union market, or exported from the European Union.

[Article 4a(3) and Article 4a(4) of the EUDR.]

6 Simplified due diligence

6.1 The Organization shall not be required to conduct a risk assessment under Section 3 or risk mitigation under Section 4 of this standard addendum, where all of the following conditions are met:

a) the management unit is located in a country or parts thereof classified as low risk in accordance with EUDR three-tier risk system; and
b) The Organization has assessed and documented the complexity of the relevant supply chain; and
c) The Organization has assessed and documented the risk of circumvention of the EUDR or this standard addendum; and
d) The Organization has assessed and documented the risk of mixing with products that are of unknown origin, non-FSC certified, from countries or parts thereof classified as standard risk or high risk, or products not assessed against this standard addendum; and
e) the assessment required under Clause 6.1 b), c) and d) concludes that there is negligible risk of circumvention or mixing [Clause 11 of FSC-STD-30-010; Article 13(1) of the EUDR].

NOTE 1: Where The Organization qualifies as an MSPO, simplified due diligence may be applied only where the conditions required under Clause 6.1 of this standard addendum are met. The MSPO remains responsible for information collection under Section 2 of this standard addendum and for the simplified declaration or declaration identifier under Section 5 of this standard addendum.

NOTE 2: The simplified declaration for MSPO is a separate reporting route and does not replace the need to demonstrate that the product is deforestation-free, legally produced, traceable, and not subject to non-negligible risk of circumvention or mixing.

NOTE 3: Simplified due diligence under Section 6 does not remove the requirement to exercise due diligence under Section 1, collect and retain information under Section 2, or maintain a due diligence system. It only means that risk assessment under Section 3 and risk mitigation under Section 4 are not required where all conditions in Clause 6.1 are met and Clause 6.4 is not triggered.

6.2 In cases where a simplified due diligence is exercised in accordance with Clause 6.1 of this standard addendum, the requirements in Sections 3 and 4 of this standard addendum do not apply, unless Clause 6.4 of this standard addendum applies.

6.3 Relevant documentation demonstrating conformity with Clause 6.1 of this standard addendum is kept for five years and made available to the competent authority upon request [Clause 11 of FSC-STD-30-010; Article 13(1) of the EUDR].

6.4 Simplified due diligence is not applied if The Organization obtains or is made aware of any relevant information and substantiated concerns submitted by stakeholders that would point to a risk that the product:

a) is not deforestation-free; or
b) has not been produced in accordance with the relevant legislation of the country of production [Clause 11 of FSC-STD-30-010; Article 13(2) of the EUDR].

7 Non-compliances

7.1 If a competent authority establishes that The Organization is not compliant with the EUDR or that it has placed on the market or exported a non-compliant product, the certification body is informed about the non-compliance immediately [Clause 11 of FSC-STD-30-010].

7.2 If The Organization obtains or is made aware of relevant new information, including substantiated concerns, indicating that a product that they have placed on the market or exported is at risk of nonconformity with the FSC Regulatory Module, the relevant competent authorities of the country(ies) involved and the organizations to whom the product has been supplied are immediately informed [Clause 11 of FSC-STD-30-010; Article 4(5) of the EUDR].

7.3 The relevant competent authority is informed in case of suspension of the FSC Regulatory Module from The Organization’s certification scope.

ANNEX 1: REQUIREMENTS FOR THE ORGANIZATIONS OUT OF THE SCOPE OF THE EUDR

Note: For the organizations that are not required to comply with the EUDR, the requirements in Table 2 are either not or partially applicable.

Table 2. Applicability of requirements for organizations not required to comply with the EUDR

Clause No.	Applicability	Clarification
1.3	Not applicable	
1.4	Not applicable	
1.5	Not applicable	
3.3	Not applicable	
5.1	Not applicable	
5.2	Not applicable	
6.3	Not applicable	
7.1	Not applicable	
7.2	Partially applicable	The relevant competent authorities are not required to be informed, only the organizations to whom the product has been supplied.
7.3	Not applicable	

ANNEX 2: DUE DILIGENCE STATEMENT AND SIMPLIFIED DECLARATION

This annex contains information to be submitted in the European Commission's Information System, where required under Section 5 of this standard addendum.

Annex 2A: applies where The Organization is required to submit a due diligence statement in accordance with Article 4(2) and Annex II of the EUDR.

Annex 2B: applies where The Organization qualifies as an MSPO and is required to submit a one-time simplified declaration, or where the information is otherwise made available through a system or database established under Union or Member State law, and a declaration identifier is assigned.

Annex 2A: Due Diligence Statement

Information to be included in the due diligence statement in accordance with Article 4(2) and Annex II of the EUDR:

1. Operator's name, address and, in the event of relevant commodities and relevant products entering or leaving the market, the Economic Operators Registration and Identification (EORI) number in accordance with Article 9 of Regulation (EU) No. 952/2013.
2. Harmonized System code, free-text description, including the trade name as well as, where applicable, the full scientific name, and quantity of the relevant product that the operator intends to place on the market or export. For relevant products entering or leaving the market, the quantity is to be expressed in kilogrammes of net mass and, where applicable, in the supplementary unit set out in Annex I to Council Regulation (EEC) No. 2658/87 against the indicated Harmonized System code or, in all other cases, expressed in net mass specifying a percentage estimate or deviation or, where applicable, volume or number of items. A supplementary unit is applicable where it is defined consistently for all possible subheadings under the Harmonized System code referred to in the due diligence statement.
3. Country of production and the geolocation of all plots of land where the relevant commodities were produced. Where the relevant product contains or has been made using commodities produced in different plots of land, the geolocation of all plots of land shall be included in accordance with Article 9(1), point (d) of the EUDR.
4. The text: 'By submitting this due diligence statement the operator confirms that due diligence in accordance with Regulation (EU) No. 2023/1115 was carried out and that no risk or only a negligible risk was found that the relevant products do not comply with Article 3, point (a) or (b), of that Regulation'.
5. Signature in the following format:
'Signed for and on behalf of:
Date:
Name and function:
Signature:'.

Annex 2B: Simplified Declaration for Micro or Small Primary Operators

Information to be included in the one-time simplified declaration in accordance with Article 4a(3) and Annex III of the EUDR:

1. Micro or small primary operator's name, address and, in the event of relevant commodities and relevant products entering or leaving the market, the Economic Operators Registration and Identification (EORI) number in accordance with Article 9 of Regulation (EU) No. 952/2013.
2. Harmonized System code and free-text description of the relevant products, including the trade name, and the one-off estimated annual quantity of relevant products intended to be placed on the market or exported, expressed in net mass specifying a percentage estimate or deviation or, where applicable, volume or number of items. For relevant products entering or leaving the market, the estimated quantity is to be expressed in kilogrammes of net mass and, where applicable, in the supplementary unit set out in Annex I to Council Regulation (EEC) No. 2658/87 against the indicated Harmonized System code. In all other cases, the estimated quantity is to be expressed in net mass specifying a percentage estimate or deviation or, where applicable, volume or number of items.
3. Country of production and the geolocation of all plots of land, or the postal address of all plots of land on which the micro or small primary operator produces relevant commodities. Where the relevant products are produced on different plots of land, the postal address or the geolocation of all plots of land shall be included in accordance with Article 9(1), point (d), of the EUDR.
4. The text: 'By this declaration, the micro or small primary operator confirms that it will exercise due diligence in accordance with Regulation (EU) 2023/1115 for the relevant products it places on the market or exports and that it will place them on the market or export them only if no risk or a negligible risk is found that the relevant products do not comply with Article 3, point (a) or (b), of that Regulation'.
5. Signature in the following format:
   Signed for and on behalf of:
   Date:
   Name and function:
   Signature:'.

NOTE: Where all information required for the simplified declaration is available in a system or database established under Union or Member State law, The Organization is not required to submit a separate one-time simplified declaration, provided that a declaration identifier has been assigned before the relevant product is sold with the FSC Regulatory+ claim, placed on the European Union market, or exported from the European Union.

ANNEX 3: INDICATORS FOR RISK ASSESSMENT

Table 3 contains the relevant clauses in <FSC-STD-30-010 V3-0 Controlled Forest Management> as per the set of indicators from <FSC-PRO-60-006b V2-0 FSC Risk Assessment Framework> applicable to The Organization's own risk assessment, except for indicator no. 26 (simplified risk assessment).

Table 3. Indicators for risk assessments and relevant criteria

No. in FSC-PRO-60-006b	Indicator	Relevant clauses in FSC-STD-30-010 V3-0
Land use and management		
1	*Land tenure rights are secured and registered according to legal requirements.*	14 (C 1.2)
2	*Land management rights are in place and registered according to legal requirements.*	14 (C 1.2) 15 (C 1.3)
3	*Forest concession licences are in place and are issued and registered according to legal requirements.*	14 (C1.2) 14 (C 1.3)
4	*Harvesting permits are in place and are issued and registered according to legal requirements.*	15 (C 1.3)
5	*Legal requirements for land-use and management planning are complied with.*	15 (C 1.3)
Taxes and fees		
6	*Legal requirements for payment of royalties, land/area taxes and fees are complied with.*	15 (C 1.3)
7	*Legal requirements for payment of value-added taxes and/or other sales taxes are complied with.*	15 (C 1.3)
8	*Legal requirements for payment of corporate taxes are complied with, including profit taxes.*	15 (C 1.3)
9	*Legal requirements for payment of trade and/or export taxes and fees are complied with.*	15 (C 1.3)
Corruption and/or document and data falsification		
10	*Legal requirements related to corruption, including bribery, fraud and conflict of interest, are complied with.*	19 (C 1.7)
11	*All forms of bribery and corruption are avoided.*	19 (C 1.7)
12	*Data and document falsification do not occur.*	19 (C 1.7)

Management activities and environmental protection		
13	*Legal requirements for management activities and related operational requirements are complied with.*	15 (C 1.3)
14	*Development and maintenance of infrastructure associated with management activities comply with applicable codes and legal requirements for the protection of environmental values.*	15 (C 1.3)
16	*Legal requirements related to biodiversity conservation, protected sites, and the protection of endemic, rare, threatened, or endangered species and their habitats are complied with.*	15 (C 1.3)
17	*Legal requirements relating to the harvesting, collection, and trade of CITES species are complied with.*	15 (C 1.3) 17 (C 1.5)
18	*The volume and impacts of waste from management activities comply with legal requirements, and are managed and minimized.*	52 (C10.12)
19	*Pollution resulting from management activities comply with legal requirements, and is controlled and minimized.*	38 (C6.3) 49 (C 10.7) 51 (C 10.10)
20	*Water resources are protected and used responsibly in compliance with legal requirements, and with the aim of ensuring long-term viability.*	15 (C 1.3) 42 (C 6.7)
21	*Negative impacts on soils from management activities are minimized and comply with legal requirements.*	15 (C 1.3)
Health and safety		
22	*Legal requirements related to occupational health and safety are complied with.*	15 (C 1.3)
24	*The use, application, storage, and disposal of chemicals in management activities addresses the protection of the environment and human health and safety and complies with legal requirements.*	15 (C 1.3)
Human and labour rights		
25	*Human rights protected under international law, as enshrined in national law, are complied with.*	21 (C 2.1) 30 (C 3.4)
26	*Harvest or trade in products do not contribute to a violation of international human rights or is not associated with armed conflicts.*	Not covered

27	*Legal requirements related to child labour and employment of young workers are complied with.*	15 (C 1.3)
29	*Legal requirements related to modern slavery, including forced and compulsory labour, are complied with.*	15 (C 1.3)
31	*Legal requirements related to the Freedom of Association, the Right to Organize and the Right to Collective Bargaining are complied with.*	15 (C 1.3)
33	*Legal requirements related to the recruitment and employment of workers are complied with.*	15 (C 1.3)
34	*Legal requirements related to the contracts and working permits, and requirements for competence certifications and other training requirements are complied with.*	15 (C 1.3)
35	*Legal requirements related to workers' wages and other payments, such as social insurance contributions and the payment of social and income taxes withheld by the employer on behalf of the worker are complied with.*	15 (C 1.3) 24 (C 2.4)
36	*Legal requirements related to working hours, overtime, rest time and time off are complied with.*	15 (C 1.3)
38	*Legal requirements related to discrimination against workers are complied with.*	15 (C 1.3)
40	*Legal requirements related to gender equality in the workplace are complied with.*	15 (C 1.3) 21 (C 2.1) 22 (C 2.2)
Third parties' rights		
42	*Legal requirements related to the rights of Indigenous Peoples are complied with.*	15 (C 1.3)
43	*The rights of Indigenous Peoples, including land tenure and management, are respected and upheld according to the principles of FPIC.*	28 (C 3.2) 30 (C 3.4)
44	*Legal requirements related to the rights of traditional peoples are complied with.*	15 (C 1.3) 33 (C 4.2)
45	*The rights of traditional peoples, including land tenure and management, are respected and upheld according to the principles of FPIC.*	33 (C 4.2)
46	*Legally recognized customary and community rights are identified and respected.*	15 (C 1.3) 27 (C 3.1) 28 (C 3.2) 32 (C 4.1)

		33 (C 4.2)
47	*The rights of local communities are respected and upheld.*	33 (C 4.2)
48	*Interaction with Indigenous Peoples, traditional peoples and local communities is conducted in a respectful and culturally appropriate manner.*	27 (C 3.1) 32 (C 4.1)
Trade and transport		
49	*Legal requirements related to the trade and transport of products are complied with.*	17 (C 1.5)
50	*Legal requirements related to applicable trade restrictions and sanctions are complied with.*	17 (C 1.5)
51	*Legal requirements related to the classification of products are complied with.*	17 (C 1.5)
52	*Legal requirements related to the export and/or import of products are complied with.*	17 (C 1.5)
53	*Legal requirements relating to offshore trading and transfer pricing are complied with.*	17 (C 1.5)
Due diligence/due care		
54	*Legal requirements relating to due diligence or due care are complied with.*	15 (C 1.3)
Conversion and forest degradation		
55	*There is no conversion from natural forest and no transformation of plantations to agricultural use since 31 December 2020.*	53 (C 6.9) 55 (C 6.11) FSC-ADV-20-007_24
57	*There is no degradation of natural forests since 31 December 2020.*	53 (C 6.9) 55 (C 6.11)

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