

DER-STD-40-004_02 V1-1 Delay in applicability for activities outsourced for storage, logistics, or forwarding of ‘finished and labelled’ products

Normative references	Clause 13.2, FSC-STD-40-004 V3-1; ADVICE-40-004-23 V2-0; INT-STD-40-004_30.
Scope	<input checked="" type="checkbox"/> Generic (applicable by all certificate holders) <input type="checkbox"/> Specific (applicable only upon individual request and PSU confirmation)
Approval	V1-0: 20 October 2025 V1-1: 27 May 2026
Effective date	V1-0: 22 October 2025 V1-1: 1 July 2026
Period of validity	V1-0: 30 June 2026 V1-1: 31 December 2028
Rationale	<p>Various stakeholders have reached out to FSC International with concerns that they are unable to meet the requirements in the revised ADVICE-40-004-23 V2-0 by the end of the given transition date, which is applicable to all non-FSC-certified contractors with outsourcing agreements in the scope of the chain of custody certification activities. Additionally, they have noted their concern for implementing the requirement for warehouses that store stock that is ‘finished and labelled’ but not yet sold, where the property is not owned by or under the control of the Organization. The reasoning for this difficulty relates to the resource effort and cost to implement these requirements for potentially hundreds of sites globally, in addition to there being ‘no risk of mixing’, as the products are ‘finished and labelled’.</p> <p>In the Chain of Custody Standards Revision, there is the suggestion that storage sites or logistic activities will be exempted from the requirements for outsourcing agreements, and therefore any relevant requirements related to the FSC core labour requirements, provided in ADVICE-40-004-23 V2-0. Due to this potential change in the requirements forthcoming, which will be initially consulted as part of the first draft from 15 November 2025 until 25 January 2026, FSC International is providing this derogation for the provision of storage, logistics, or forwarding services for ‘finished and labelled’ products, to provide time for the analysis of the results of the consultation. Dependent on the results of this analysis, the direction of future changes should be clearer by mid-2026, and FSC International will subsequently provide further action, such as extension of the derogation until the implementation of the new standard requirements.</p> <p>Update (V1-1)</p> <p>Based on the results of the stakeholder consultation on FSC-STD-40-004 V4-0 D1-0, FSC International have decided to extend the validity</p>

of this derogation for stakeholders until eighteen (18) months after the proposed effective date of the revised standard (31 December 2028).

FSC Conclusion FSC grants the right for a certified Organization that outsources storage, logistics, or forwarding services for 'finished and labelled' products or products marked in a way that the contractor cannot alter or exchange products (e.g., heat brand, printed materials) to delay meeting the requirements in ADVICE-40-004-23 V2-0 for any of its non-FSC-certified contractors beyond the transition end date (31 December 2025), provided that there is no risk of mixing of the labelled or marked products during the storage, logistics, or forwarding activities.
