Forest Stewardship Council®

FSC FORESTS FOR ALL FOREVER™

DER-STD-20-011_13 V2-0 Undertaking CoC Evaluations Remotely in the Middle East

Normative reference	FSC-STD-20-011 V4-3, clause 6.2 FSC-STD-20-011 V4-2, clause 2.7 c) ADVICE-20-011_10
Scope	☒ Generic (applicable by all certificate holders) ☐ Specific (applicable only upon individual request and FSC confirmation)
Approval	V1-0: 10 September 2026 V2-0: 13 November 2026
Effective date	V1-0: 10 September 2026 V2-0: 13 November 2026
Period of validity	V1-0: 31 December 2026 V2-0: 30 June 2027
Rationale	On 10 March 2026, FSC published DER-STD-20-011_05, permitting certain chain of custody (CoC) evaluations to be conducted remotely in the Middle East. The rationale was that military strikes had occurred in the region, and there was a risk of ongoing reprisal attacks, escalation across the region, and deterioration of local security situations. This affected the ability of auditors to travel to the affected geographical areas to perform physical inspections of sites. DER-STD-20-011_05 was valid until 10 September 2026. However, high-level travel restrictions continue to apply to the geographic areas listed below. International SOS advises deferring all inbound travel to some areas, and only conducting business-critical travel to others. Accordingly, FSC decided to grant V1-0 of this new Derogation (DER-STD-20-011_13), valid until 31 December 2026, on the same terms as the previous derogation. Due to ongoing security concerns in the region, on 13 November 2026, FSC decided to publish an updated version (V2-0) of this Derogation. The updated version makes two changes: • The period of validity is until 30 June 2027 (i.e. a 6-month extension from V1-0); and • The scope of the derogation has been extended to main evaluations in **limited circumstances only** (see terms outlined in 'FSC Conclusion' below.
FSC Conclusion	FSC grants the request for remote audits to replace on-site surveillance evaluations (for all organizations), main evaluations (in limited circumstances only),and re-evaluation assessments (for low-risk organizations) for certificate holders with operational sites located in the following list of geographical areas: • Bahrain

- Iran
- Iraq
- Israel and the Occupied Palestinian Territories, including the West Bank and the Gaza Strip
- Jordan
- Kuwait
- Lebanon
- North Sinai
- Oman
- Palestinian Territories
- Qatar
- Saudi Arabia
- South Sinai
- Syria
- United Arab Emirates
- Yemen

Preconditions for Main Evaluations
For applicants that meet either of the following criteria, the certification body (CB) may undertake the main evaluation remotely:

a) The applicant is a trader without physical possession; or
b) The applicant is a trader with physical possession where storage or logistic activities are outsourced (e.g. port storage or forwarding), provided that there is no risk of mixing.

This derogation is not applicable to main evaluations where the applicant does not meet either of the above criteria.

Preconditions for Re-evaluation Assessments
For organizations with 'low' risk (see Annex A), the CB may undertake the re-evaluation assessment remotely.

The CB shall conduct a risk assessment for each organization according to the scenarios/factors provided in **Annex A** to determine the option of conducting remote audits for re-evaluation assessments.

The risk assessment is to be undertaken at the level of a single site and not at the certificate level. For multi-site certificates, the risk assessment shall be undertaken for each participating site (or for each site selected by sampling) prior to the re-evaluation assessment audit.

When an organization falls into more than one risk category, the CB shall adopt the precautionary approach and apply the higher risk category.

For organizations that would be considered 'medium' or 'high' risk (see Annex A), CBs shall provide additional requested information to FSC for a separate derogation to be considered for re-evaluation assessments on a case-by-case basis.

The additional information to be provided to FSC for assessment should include, but is not limited to:

- Certification scope;
- FSC product groups;
- FSC sales (Annual Volume Summary);
- FSC stock on-site.

Annex A: Risk determination for undertaking remote re-evaluation assessments

Scenario	Low risk	Medium risk	High risk
Traders	• without physical possession • with physical possession, but restricted to storage/trading in finished and labelled products	• With physical possession and trading in unfinished/non-labelled products	
Primary and secondary producers/ processors/printers and related services	• Exclusively handling certified products made of single input material (e.g., whole site deals with FSC 100%) • All inputs to production are eligible inputs according to Table B in FSC-STD-40-004, only transfer system is used and physical segregation is not required	• Use of either percentage or credit system with/without multiple product groups	• High complexity with management and uses of all control systems.
Non-eligible input entering the supply chain	• Risk mitigated by temporal separation of material	• Risk mitigated by identification of material • Risk mitigated by physical separation of materials if mitigation can be verified by real time video	• Risk mitigated by physical separation of materials
Contractors/outsourcing activities	• Low risk contractors o*r* High-risk contractors with low risk categorization as per Clause 9.3 of FSC-STD-20-011	• Low risk contractors but with identified risk of improper additions or mixing by the contractors at the contracting facility	• High risk contractors as defined in Clause 9.2 of FSC-STD-20-011
Sourcing reclaimed materials	• Supplier audit program undertaken by another FSC accredited CB	• Reclaimed material classification can be demonstrated through objective evidence upon receipt.	• Supplier audit program undertaken by organization *and* reclaimed material classification through objective

			evidence not possible.
Sourcing CW through implementation DDS as per requirements of FSC-STD-40-005 standard	• Low risk of origin, *and* • Low risk of mixing	• Specified risk for origin (mitigation measures do not require field level verification) *and* • Low risk of mixing	• Specified risk for origin (mitigation measures require field level verification) o*r* • Specified risk of mixing that can be mitigated only by physical separation.
Group and multi-site certification **(Central office requirements may be evaluated in the same manner as a single site)**	• Normal risk** participating site	• High risk participating site* which meets remote audit requirements for reclaimed materials sourcing, CW sourcing and for contractors	• High risk participating site*.
Other risk factors		• Custom manufactured products with individual conversion factors • Project certification	• Unresolved complaints/disputes regarding the organization's conformity to the requirements of FSC standards

***High-risk participating site**: A participating site operating a controlled wood verification program or due diligence system according to FSC-STD-40-005, a supplier audit program for reclaimed materials according to FSC-STD-40-007, or high-risk outsourcing to a non-FSC-certified contractor.

****Normal risk participating site:** A participating site that does not conduct any of the activities considered 'high risk' above.