Standard Addendum

FSC REGULATORY MODULE – CHAIN OF CUSTODY EVALUATIONS

FSC-STD-20-011r V1-1

FSC FORESTS FOR ALL FOREVER™

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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 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 FSC Regulatory Module.

Using the FSC Regulatory Module

The FSC Regulatory Module benefits organizations by translating the EUDR's legislative requirements into certification requirements. This is useful for organizations required to comply with the EUDR, 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 supply chains for products that will eventually be placed (or made available) on the European Union market, may wish to become certified against the FSC 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.

Additional requirements for FSC-accredited certification bodies to conduct chain of custody evaluations in this standard addendum include additions to evaluation requirements, evaluation at the level of the operational site, surveillance evaluation, certification decision, evaluation of controlled wood, evaluation of the organizations' due diligence system under chain of custody, and reporting requirements.

While certification bodies evaluate conformity to the requirements of the FSC Regulatory Module, the ultimate decision regarding EUDR compliance rests with relevant competent authorities.

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A. SCOPE

This standard addendum is for voluntary use by certification bodies to evaluate organizations applying for or holding FSC Chain Of Custody Certification as per <FSC-STD-40-004 Chain of Custody Certification> (and, if applicable, <FSC-STD-40-005 Requirements for Sourcing FSC Controlled Wood>), or Project Certification as per <FSC-STD-40-006 FSC Standard for Project Certification>, that wish to extend their certification scope in order to align with Regulation (EU) 2023/1115 (also referred to as the 'Regulation' or 'EUDR').

Certification bodies may choose whether to offer to evaluate the organizations' conformity to the FSC Regulatory Module. However, if a certification body chooses to offer such evaluations, the certification body must conform to the requirements in <FSC-STD-20-001 General requirements for FSC accredited certification bodies>, <FSC-STD-20-011 Chain of Custody Evaluations>, <FSC-STD-20-001r Regulatory Module – General Requirements for Certification Bodies> and this standard addendum.

Certification bodies that choose to evaluate organizations against this standard addendum must include controlled wood sourcing for chain of custody in their scope of accreditation.

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

B. REFERENCES

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

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

FSC-STD-20-001	General Requirements for FSC Accredited Certification Bodies
FSC-STD-20-011	Chain Of Custody Evaluations
FSC-STD-20-001r	Regulatory Module – General Requirements for Certification Bodies

C. TERMS AND DEFINITIONS

For the purposes of this document, the terms and definitions included in <FSC-STD-01-002 FSC Glossary of Terms>, <FSC-STD-20-001 General requirements for FSC accredited certification bodies>, <FSC-STD-20-011 Chain of Custody Evaluations>, <FSC-STD-20-001r Regulatory Module – General Requirements for Certification Bodies>, 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)].

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 an organization that:

a) is a micro or small-sized undertaking, as defined in Article 3(1) and Article (2) 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; and
c) directly places on the EU market or directly exports relevant products to the EU market that this operator itself has grown, harvested, obtained from or raised on relevant plots of land.

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

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

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

Micro, small or medium-sized enterprise (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 does not meet the definition of a downstream operator and that:

a) directly places relevant products on the EU market for the first time;
b) exports relevant products from the EU; or
c) re-imports relevant products into the EU that were previously exported from the EU (unless the relevant products were previously placed on the EU market and subject to due diligence, and subsequently placed under the customs procedure 'release for free circulation').

NOTE: The EUDR uses the term 'operator' in Article 2(15). In this standard addendum, 'upstream operator' is used to distinguish this role from downstream operators.

Other definitions

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

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 upstream 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, point (a) or (b), and 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) (Source: <FSC-STD-40-005 Requirements for Sourcing FSC Controlled Wood>).

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

Fully verified supply chain: supply chain where every certificate holder has become certified against the <FSC Regulatory Module> and establishes a product group for the purpose of controlling the Regulatory+ output claim.

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

Mitigation measure: an action that the organization shall take to mitigate the risk of sourcing material from unacceptable sources [Equivalent EUDR definition – Article 11(1)].

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

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

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

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

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

Relevant products: products listed in Annex I of the EUDR that contain, have been fed with, or have been made using relevant commodities.

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).

Verbal forms for the expression of provisions

[Adapted from *ISO/IEC Directives Part 2: Rules for the structure and drafting of International Standards*] ‘shall’: indicates requirements strictly to be followed in order to conform with the standard.

‘should’: indicates that among several possibilities one is recommended as particularly suitable, without mentioning or excluding others, or that a certain course of action is preferred but not necessarily required. A ‘should requirement’ can be met in an equivalent way provided this can be demonstrated and justified.

‘may’: indicates a course of action permissible within the limits of the document.

‘can’: is used for statements of possibility and capability, whether material, physical or causal.

D. ABBREVIATIONS

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

ADDITIONAL ACCREDITATION REQUIREMENTS FOR FSC-STD-20-011 CHAIN OF CUSTODY EVALUATIONS

1 Evaluation at the level of the operational site

1.1 The certification body's evaluation shall include a review of information obtained, including complaints, disputes, or allegations, that would point to a risk of The Organization's nonconformity to the FSC Regulatory Module[1].

1.2 The certification body's evaluation shall include a sample of purchasing and sales documentation in the scope of the FSC Regulatory Module. The certification body shall record the corresponding due diligence statement reference number(s) or declaration identifier(s) (if applicable). The sampling shall be carried out according to the scope, scale, intensity, and risk of The Organization's operation[2].

1.3 The certification body shall evaluate and confirm the plausibility of the supplementary information and evidence associated to the purchasing and sales documentation.

NOTE: To 'confirm the plausibility' means that the evidence can be corroborated by independent sources (e.g. verifiable public sources).

1.4 The certification body shall confirm that the inputs used in the product groups, covered by the FSC Regulatory Module, were supplied with a regulatory claim (if applicable).

2 Certification decision

2.1 For evaluations in the scope of the FSC Regulatory Module, major nonconformities may be caused by failure of The Organization to conform to any of the applicable requirements, including but not limited to examples provided in Box 1.

Box 1. Examples of major nonconformities for evaluation of the FSC Regulatory Module (informative guidance)

Examples of major nonconformities to the requirements of the FSC Regulatory Module include:

a) missing or incorrect information in the sales documentation (including supplementary documentation) relating to the FSC Regulatory Module (e.g. date or time range of production);

b) ineffective segregation measures resulting in mixing of regulatory material with non-eligible material;

c) false or incorrect regulatory claims on non-eligible material;

d) absence of, or failure to implement, a complaint procedure by an upstream operator;

e) evidence that The Organization has manipulated information regarding the compliance with timber legality legislation;

f) failure to provide the necessary assistance to the competent authorities.

[1] Clause 2.6 e) FSC-STD-20-011
[2] Clause 2.6 g) FSC-STD-20-011

3 Evaluation of controlled wood according to FSC-STD-40-005

3.1 The certification body shall evaluate whether the information on material and its supply chain allows The Organization to confirm the origin of the material to the plot of land and verify the time of production[3].

4 Evaluation of an upstream operator's due diligence system under chain of custody

General requirements

4.1 If The Organization meets the definition of an upstream operator, the certification body shall evaluate whether information on material and supply chains allows The Organization to:

a) confirm the origin of the material to the geolocation of the plot(s) of land (or the postal address, if applicable);

b) conduct a risk assessment, if applicable;

c) develop and implement mitigation measures mitigating or avoiding the risk(s), if applicable; and

d) review, and if necessary revise, the DDS to ensure its relevance, effectiveness, or adequacy.

NOTE: This includes evaluating whether The Organization has required its suppliers to notify it of any changes affecting risk designation or mitigation.

4.2 All records used for evaluating the DDS shall be sampled at random. When selecting documents for sampling, the certification body shall not be guided or influenced by staff of The Organization.

4.3 The certification body shall specify and justify the sampling rate of data, including, but not limited to:

a) history of nonconformities;

b) any information received by The Organization and/or the certification body that would point to a risk of nonconformity;

c) complexity and length of supply chains; and

d) participation in a fully verified supply chain.

NOTE: The history of nonconformities refers not only to those in the scope of the FSC Regulatory Module, but also to The Organization's management control, including the identified critical control points.

4.4 The certification body shall evaluate the accuracy of the data used to support The Organization's DDS and shall determine additional means of evaluation when a risk of nonconformity to the certification requirements exists.

NOTE: Field evaluations (audits at the forest level and on-site evaluations of suppliers/sub-suppliers) may be necessary to evaluate the accuracy of the data.

Risk Assessment Requirements

4.5 Where The Organization is sourcing FSC Mix or FSC Controlled Wood input materials, the certification body shall approve The Organization's DDS for the existing supply area and/or extended to new supply areas, covering the risk assessment process for the risk of origin and the risk of mixing, risk designation, and corresponding mitigation measures (where applicable).

[3] Clause 6.5 FSC-STD-20-011

4.6 Where The Organization is solely sourcing FSC 100% or FSC CFM input material, the certification body shall evaluate The Organization's DDS at each audit and assess the changes between audits.

4.7 The certification body shall approve a reviewed and revised DDS where the risk designation changes from non-negligible to negligible risk, whether or not this occurs during the annual evaluation.

Risk related to origin

4.8 The certification body shall evaluate the correct use of applicable FSC Risk Assessment(s).

4.9 The certification body shall evaluate whether The Organization's risk assessment and risk designations are adequate and justified, including whether:

a) the risk assessment follows all applicable requirements of <FSC-PRO-60-006b V2-0 Risk Assessment Framework>;

b) the sources of information used are independent, objective, and sufficient to justify risk designation;

c) the geopolitical scale of the assessment is adequate to the supply area(s);

d) the risk designation is justified and verifiable based on sources used;

e) the risk specification includes sufficient information to allow the development of adequate mitigation measures.

4.10 The certification body shall evaluate whether The Organization has reviewed and revised its risk assessment where necessary, to ensure its continued correctness and relevance.

Risk related to mixing material

4.11 The certification body shall evaluate whether the risk assessment related to the mixing of material with non-eligible inputs during transport, processing, and storage before the material reaches The Organization is adequate to the scope of the DDS and justified.

Evaluation of risk mitigation

4.12 The certification body shall evaluate the implementation and the adequacy of mitigation measures, including:

a) a sample of each type of mitigation measure for each type of risk identified in the DDS. The sampling rate shall be established and justified by the certification body according to the scope of the DDS;

b) results of internal and external audits by The Organization;

c) comments, complaints, appeals, substantiated concerns, and any information received by the certification body;

d) the process of review and revision of the DDS by The Organization.

5 Reporting requirements

NOTE: The requirements in this section are additional to Section 12, Table B of <FSC-STD-20-011 Chain of Custody Evaluations>.

5.1 As applicable, <FSC-STD-40-004r FSC Regulatory Module – Chain of Custody Certification> or <FSC-STD-40-006r FSC Regulatory Module – Project Certification> (including the version number) shall be added as an applicable FSC standard to item 2 e).

5.2 A brief description of the system though which The Organization maintains control of all product groups in the scope of the FSC Regulatory Module shall be added to the evaluation findings in item 4 a) and item 5 a).

5.3 The certification body shall describe the evaluation of the FSC Regulatory Module requirements, including at minimum:

a) a description of the DDS, where applicable;

b) information made publicly available by The Organization, or references to such information (according to Section 12 of <FSC-STD-40-004r FSC Regulatory Module – Chain of Custody Certification> or Section 11 of <FSC-STD-40-006r FSC Regulatory Module – Project Certification>). Such information shall be available for the period of validity of the certificate;

c) information about who has developed the DDS or elements of it, including whether the DDS was developed by an external party, where applicable;

d) a brief summary of the risk mitigation measures applied by The Organization, where applicable; and

e) a brief summary of findings from field evaluation(s) (including audits at the forest level and on-site evaluation of suppliers in the supply chain), with justification for the sampling rate applied, where applicable.

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