Consultation Questions FSC-STD-40-004

Sections	Background information & Key changes	Questions
Scope	The scope section has been revised to become clearer, and incorporate the requirements of Annex C. This section clarifies to whom and to which products the CoC certification applies. **IMPORTANT:** Informative part of Annex C and other annexes of V3-1 will be moved to a guidance document. **Key changes:** • Including normative parts of Annex C from previous version (V3-1) • Incorporating INT-STD-40-004_58 • Incorporating INT-STD-40-004_72 • Incorporating INT-STD-40-004_73 **Section 1.2 of Scope** This section clarifies the requirements for mixing non-timber forest products and wood-based products and the exemption that if NTFP and wood-based products are mixed and indistinguishable, NTFP may be uncertified (except cork, rattan and bamboo)	**Q 1a:** To what extent do you agree with the changes to the scope section? (agree, neutral, disagree) **Q 1b**: Please provide the rationale for your answer and/or any suggestions for improvement. **Q 2a:** To what extent do you agree with section 1.2 of Scope "mixing NTFP and wood-based products"? (agree, neutral, disagree) **Q 2b**: Please provide the rationale for your answer and/or any suggestions for improvement. **Q2c:** Currently, the exemption applies if the FSC label clearly indicates the FSC-certified wood. Do you think the exemption should be applicable if the claim also clearly identifies the certified wood-based material or it should be limited to the label only?
Section 1	**General** Changes in this section mainly included streamlining and adding clarity. **Workers' Rights changes**	**Q 3a:** To what extent do you agree with the changes in this section "Management system"? (agree, neutral, disagree) **Q 3b**: Please provide the rationale for your answer and/or any suggestions for improvement.

Sections	Background information & Key changes	Questions
	In the current standard, the Clauses related to FSC CLR are: 1.5, 1.6 and 1.11. As one of the key intended outcomes of this revision being to simplify and clarify, it was considered prudent to ensure all labour rights-related Clauses were grouped together, and streamlined where possible, incorporating other relevant normative references, such as interpretations and Advice Notes. Additionally, in relation to health and safety, there was discussion from the Conceptual Phase on whether to include occupational health and safety as a core labour requirement, to reflect changes by the International Labour Organization (ILO) including 'safe and healthy working environment' as a fundamental right, however there was unanimity on this. The working group discussed at length on this matter, with majority favouring its retention in Section 1. Therefore, the current standard wording has been reformulated and enhanced, including the incorporation of Motion 51/2021, to provide right to freely elect OHAS representative(s). **Key changes:** • Combining requirements for policy and self-assessment • Incorporating INT-STD-40-004_61/INT-STD-20-011_36 • Incorporating INT-STD-40-004_68 • Incorporating ADVICE-40-004-24. • Incorporating Motion 51/2021	**Q.4a.** To what extent do you agree with the restructuring of workers' rights-related clauses in Section 1, and the incorporation of the relevant interpretations and advice note? (agree, neutral, disagree) **Q.4b:** Please provide the rationale for your answer and/or any suggestions for improvement. (free text) **Q.5a:** Please select the option you prefer? a) Keep the health and safety requirements in Section 1. b) Move the health and safety requirements to Section 8 (FSC core labour requirements)? (multiple choice) **Q.5b:** Please provide the rationale for your answer and/or any suggestions of alternatives. **Q 6.** Please provide any other comments you have about the changes related to workers' rights in Section 1. (free text)

Sections	Background information & Key changes	Questions
Section 2	This section has undergone major changes. The goal of this section is to define the scope of activities of the certificate holder. **Key changes:** The certificate holder is required to define: a) Whether they are single, group or multisite certificate holder b) Which product groups are included in their scope c) What are the eligible inputs for relevant output claims Furthermore, 1) Second downgrading scenario is added for FSC Recycled (Figure 1) 2) Incorporating ADVICE-40-004-17 and the option to claim FSC Recycled as FSC Mix (Clause 2.8) 3) Allowing an output claim for combination of Controlled Wood, FSC Recycled, and claim-contributing reclaimed materials (Table 2 & 3) 4) Incorporating INT-STD-40-004_08 (NOTE 1 under Clause 2.6) 5) Incorporating ADVICE-40-004-27 and assigning 70% claim contribution for CFM material, downgrading option from FSC Mix 70% or above to FSC CFM or below 70% (Figure 1) 6) Incorporating ADVICE-40-004-26 and clear requirements for 'add-on' claims (Table 2, Clause 2.6)	**Q 7a:** To what extent do you agree with the requirements of this section "Establishment of the scope of activities"? (agree, neutral, disagree) **Q 7b**: Please provide the rationale for your answer and/or any suggestions for improvement. **Q 8a**: To what extent do you agree with downgrading scenarios in Figure 1? (agree, neutral, disagree) **Q 8b**: Please provide the rationale for your answer and/or any suggestions for improvement. **Q 9a:** to what extent do you agree with providing the option to claim FSC Recycled as FSC Mix? **Q 9b**: Please provide the rationale for your answer and/or any suggestions for improvement.
Section 3	Streamlining and moving some clauses to other section to improve the flow and logic of the standard. **Key changes:** • Incorporating INT-STD-40-004_59 (Clause 3.4)	**Q 10a:** To what extent do you agree with the changes in the section "Material sourcing"? (agree, neutral, disagree) **Q 10b**: Please provide the rationale for your answer and/or any suggestions for improvement.

Sections	Background information & Key changes	Questions
Section 4	No major change has been done on this section, only inclusion of take-back requirements **Take-back** From the conceptual phase consultation results, most participants supported the inclusion of take-back as a circularity concept within the CoC standard. This concept enables organizations to take-back FSC-certified products from their customers after the initial sale and resell them with an FSC claim. **Key changes** • three new Clauses have been introduced (4.2 – 4.4) • Key focus on product traceability and eligibility after take-back	**Take-back** **Q11a**. How feasible is the implementation of the traceability and eligibility requirements for take-back? (Feasible / Neutral / Not feasible) **Q 11b:** Please provide the rationale for your answer and/or any suggestions for improvement.
Section 5	Streamlining and moving some clauses to other section to improve the flow and logic of the standard. **Key changes:** • Traders have the option to provide annual volume summary in counting units (e.g., number of items)	**Q 12a:** To what extent do you agree with the changes in the section “FSC material and products records”? (agree, neutral, disagree) **Q 12b**: Please provide the rationale for your answer and/or any suggestions for improvement.
Section 6	**General** Streamlining and moving some clauses to other section to improve the flow and logic of the standard **Key changes:** • Incorporating INT-STD-40-004_63 (Clause 6.6) • Incorporating INT-STD-40-004_11 (Clause 6.7)	**Q 13a:** To what extent do you agree with the changes in the section “Sales”? (agree, neutral, disagree) **Q 13b**: Please provide the rationale for your answer and/or any suggestions for improvement.

Sections	Background information & Key changes	Questions
	• Incorporating INT-STD-40-004_52 (Clause 6.8) • Incorporating INT-STD-40-004_32 (Clause 6.10) • Incorporating ADVICE-40-004-15 (Clause 6.9) • Expanding the requirements to the products sold but not shipped to CHs (Clause 6.11) • Information on material coming from small and community forests will not be passed • FSC-certified products can carry other forestry certification labels	**Q 14a:** To what extent do you agree with the requirements in Clause 6.9 for "indistinguishable mix of neutral and certified material? **Q14 b:** Please provide the rationale for your answer and/or any suggestions for improvement.
Section 7	No major change in this section, reference to "timber" has been removed to make this section more exhaustive for all relevant legislation applicable to forest-based products.	
Section 8	As the inclusion of FSC CLR presented a major challenge for stakeholders from 2021, for this revision, the focus was to align and enhance, without making major changes, unless necessary and justified. The proposed changes are mainly linked to enquiries received from stakeholders (child labour, forced labour), inclusion of Motion 50/2021 to provide access to workers (freedom of association), and revised wording throughout the whole section to ensure it aligns with required drafting style (ISO). While making changes to this section, some relevant terms and definitions were also revised. **Key changes** • Redrafting child labour requirements • Provision of a conditional requirements for the use of prison labour • Inclusion of Motion 50/2021 in Freedom of Association requirements • Terms and Definitions	**Q 15a**: To what extent do you agree with the proposed key changes in Section 8 "FSC core labour requirements"? (disagree/neutral/agree) **Q15b:** Please provide the rationale for your answer and/or any suggestions for improvement. **Q 16a**: Select the option you prefer: a) inclusion of the suggested Clause 8.3.3 permitting prison labour with conditions; this provides for permission within the scope of Article 2 of ILO Convention No.29. b) absolute exclusion of any form prison labour, with a Clause providing "The

Sections	Background information & Key changes	Questions
	○ Discrimination: inclusion of 'gender' ○ Forced labour: gender-neutral wording ○ Worker: some examples to assist application in context of CoC	Organization shall not use any form of prison labour for any activities under the scope of an FSC CoC certification" or similar.." c) Neither a) nor b) **Q16b:** If you answered c) please provide your rationale for choosing neither option. (open text) **Q 17**. Please provide detail on any other changes you would like to see in Section 8 (FSC core labour requirements),and include your rationale. (open text)
Section 9	With 70% claim contribution for FSC CFM, Table 3 is also revised. **Key changes:** • Combination of FSC CFM with different claim contributing material will have the output claim of the lowest claim contributing material.	**Q 18a:** To what extent do you agree with changes in Table 3 – output claims under transfer system? **Q 18b:** Please provide the rationale for your answer and/or any suggestions for improvement.
Section 10 & 11	**Background:** In current requirements, along with other requirements, all sites that are located within the same country or in the Eurozone can apply the percentage and credit control system at the level of multiple physical sites. This means currently, cross-border credit and percentage sharing are allowed for countries that use the Euro currency. In 2020, FSC launched a pilot project in research on the application of the credit system (or percentage system) at a multi-site level, enabling cross-	**Q 19a**: To what extent do you agree with the changes to credit and percentage systems for multi-site certification? (agree, neutral, disagree) **Q 19b**: Please provide the rationale for your answer and/or any suggestions for improvement. .

Sections	Background information & Key changes	Questions
	border credit/percentage volume sharing without the transfer of physical materials. **Section(s)/ clause(s) in draft D1-0:** Clause 10.4 and 11.3 **Key changes:** • Allow the organization to establish a credit and percentage system across borders, subject to the specified requirements, including the exclusion of sites specified as “high integrity risk” (Clause 10.4 & 11.3)	
Section 12	FSC Small and Community Label has been removed due to the changes of new version of FSC-STD-50-001.	
Section 13	**General** In general, the intention of changes in this section is to provide clarity on what is required from certified and non-certified contractors. **Key changes:** • Defining the scope of outsourcing activities (what can be outsourced, Clause 13.1.1) • Exempting storage and logistic activities from outsourcing agreements if there is no risk of mixing (Clause 13.1.2) • Prohibiting outsourcing to blocked and disassociated organizations (Clause 13.1.5) • If the contractor is FSC-certified, no need for notifying the CB prior to conducting the activity (Clause 13.1.4) • Provision of further outsourcing requirements (13.2.1 c))	**Q 20a:** To what extent do you agree with the changes in the section “Outsourcing & provision of services”? (agree, neutral, disagree) **Q 20b**: Please provide the rationale for your answer and/or any suggestions for improvement. **Q 21a:** To what extent do you agree with the defined activities (Clause 13.1.1) for outsourcing? **Q 21b**: Please provide the rationale for your answer and/or any suggestions for improvement.

Sections	Background information & Key changes	Questions
	Workers' Rights On the inclusion of FSC CLR in the Chain of Custody standards, no reference to FSC CLR was provided in Section 13. In 2023, ADVICE-40-004-23 V1-0 was published with requirements for FSC CLR for contractors with outsourcing agreements. These have since been revised in 2024 with ADVICE-40-004-23 V2-0. The changes proposed in Section 13 incorporate the main parts of this Advice Note, supporting the objective of streamlining. These include adding FSC CLR as a minimum for outsourcing agreements (Clause 13.2.1 e)) and requirements related to the self-assessment and potential risk classification by the certification body in Clauses 13.2.3 - 13.2.4. Key changes • FSC CLR included in outsourcing agreement minimum criteria • Incorporating ADVICE-40-004-23 elements • Incorporating exemptions (provided in Section 1, Clauses 1.4.1-1.4.2) **Leasing** From the conceptual phase consultation results, most participants supported the inclusion of leasing in the FSC chain of custody standards. Previously, the standard focused on legal ownership transfer and did not accommodate product-as-a-service models such as leasing. To enable and regulate the leasing of FSC-certified products, six new Clauses have been introduced, with a focus on product traceability and eligibility after lease.	**Q 22a:** Do you think any activity should be added/ removed to/from the scope of outsourcing activities? **Q 22b:** Please provide the rationale for your answer and/or any suggestions for improvement. **Workers' Rights** **Q 23a**: Do you consider Clause 13.2.4 clear and easy to understand? Yes/No/Prefer not to say **Q.23b**: , please provide the rationale for your answer and/or any suggestions for improvement. (free text) **Q 24:** Please provide any other comment(s) on the changes related to workers' rights in Section 13. (free text) **Leasing** **Q25a** How feasible is the implementation of the traceability and eligibility requirements? (Feasible / Neutral / Not feasible) **Q25b:** Please provide the rationale for your answer and/or any suggestions for improvement. **Q26:** How feasible is it to establish lease agreements with non-FSC-customers for the

Sections	Background information & Key changes	Questions
		lease of certified products? (Feasible / Neutral / Not feasible) **Q27a:**How clear do you find the leasing requirements ?(Clear, neutral, not clear) **Q27b:** Please provide the rationale for your answer and/or any suggestions for improvement.
Section 14	FSC-STD-40-007 will no longer exist as a separate standard, and instead the requirements have been included under Section 14 (Sourcing reclaimed materials). Key changes: • Terms and definitions have been revised • Scope clarification: The scope of *reclaimed materials* now explicitly includes natural rubber products and textiles, with examples provided in Annex 5. • Supplier audit programme: To streamline requirements and reduce burden on certificate holders, Clause 14.6 introduces an exemption. If a supplier has already been audited by the organization's certification body or another FSC-accredited certification body, the organization may exclude that supplier from the audit sample (x). **Salvaged wood** In FSC-STD-40-004 V3-1, salvaged wood is defined as a single category covering wood materials from both within and outside the forest matrix, all subject to FSC-STD-40-005 requirements. In practice, this creates limitation or challenges for certificate holders who wish to use such materials as inputs. Salvaged materials from outside the forest matrix (e.g., urban areas) is not	**Q 28a:** To what extent do you agree with the exemption introduced for the supplier audit programme? (agree, neutral, disagree) **Q 28b:** Please provide the rationale for your answer and/or any suggestions for improvement. **Q 29:** Specify any part of the requirements that are not clear and provide suggestions for improvement. (open-ended) **Q 30a:** To what extent do you agree that non-forest salvaged wood should be considered neutral in the FSC system. (agree, neutral, disagree) **Q 30b** Please provide the rationale for your answer and/or any suggestions for improvement.

Sections	Background information & Key changes	Questions
	applicable or fall beyond the scope of FSC-STD-40-005 however they are required to be assessed as controlled wood. Therefore, the definition of salvaged wood has been revised to address this challenge. Key changes • Definitional: Two distinct salvaged wood has been defined; • Forest salvaged wood; originating from forest matrix and shall be subject to FSC-STD-40-005 requirements. • Non-forest salvaged wood - originating from outside forest matrix and is considered neutral material. **Claim contribution for non-forest salvaged wood** Some stakeholders propose that non-forest salvaged wood should be recognized as a claim-contributing input, as this material is typically recovered from waste streams or diverted from landfills. However, opposing views contend that such material is more comparable to pre-consumer wood or controlled wood, and therefore should not qualify as claim-contributing input under the FSC system. The potential risks and benefits associated with this proposal are similar to those identified for pre-consumer reclaimed wood (see attached document). Please review the risks and benefits and provide your response. **Pre-consumer reclaimed wood** Background information relevant to this consultation is provided in attachment. Kindly review the content of that document and provide your responses to Question 32 and 32 as outlined below. The proposals under consideration are presented in two parts:	**Q 31a:** To what extent do you agree that non-forest salvaged wood should be considered claim contributing inputs? (agree, neutral, disagree) **Q 31b**: Providing rational or suggestion for consideration **Q 31c:** Beyond those already identified, what other additional potential risks or benefits do you foresee? (open-ended) **Q 31d:** What potential mitigation measures should be adopted to mitigate the risks? (open-ended) **Proposal A.** **Q 32a**: To what extent do you agree with proposal **A**? (agree, neutral, disagree) **Q 32b:** Please provide the rationale for your answer and/or any suggestions for improvement. **Q 32c:** Beyond those already identified, what additional potential risks or benefits do you foresee? (open-ended) **Q 32d:** What potential mitigation measures should be adopted to mitigate the risks? (open-ended) **Proposal B**

Sections	Background information & Key changes	Questions
	A. Claim contribution for pre-consumer reclaimed wood B. Minimum approach – Recognizing pre-consumer reclaimed wood from certified inputs as claim-contributing inputs to FSC Recycled products.	**Q 33a:** To what extent do you agree with proposal **B**? (agree, neutral, disagree) **Q 33b:** Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)
Section 15 & 16	**1. CoC operation models (Question 34)** **Background:** The current eligibility criteria for the CoC operation models Sections 14, 15, and 16, of FSC-STD-40-004 V3-1), are now merged into one section for consistency and simplification. With support from definitions, the eligibility criteria requirements have the potential to be simplified. **Section(s)/ clause(s) in draft D1-0:** Section 15 **Key changes:** • Merging eligibility criteria for the CoC operation models into one (1) section. • Criteria for single CoC certification will be applied together with the definitions of **site** and **sub-site**. **2. Group certification eligibility criteria (Question 35)** **Background:** The current implementation of group CoC certification eligibility criteria requires additional procedures (FSC-PRO-40-003 and FSC-PRO-40-003a). These procedures establish requirements for countries to adjust their	**Q 34a**: To what extent do you support the change in Section 15 “CoC operation models”? **Q 34b**: Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended) **Q 35a:** To what extent do you agree with the changes to group certification eligibility criteria? **Q 35b**: Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended) **Q 36a**: To what extent do you support the change in the setup of group certification? **Q 36b**: Please provide your suggestion of change. If you disagree with the draft requirements, what alternative do you propose? **Q 37a:** To what extent do you support the revised clause 16.3.4 on auditor’s qualification?

Sections	Background information & Key changes	Questions
	thresholds in accordance with their economic conditions. However, the current structure, which includes additional requirements outside of the standard CoC certification process, adds complexity to the system. The discrepancies in group certification eligibility criteria across different countries may pose a risk to market competitiveness. The existing group certification, valued at USD 1,000,000, has been in place for 20 years. Given the changes in the global economic landscape, there is a pressing need to reevaluate this requirement. **Section(s)/ clause(s) in draft D1-0:** Clause 15.4 **Key changes:** • Revised group certification eligibility criteria; • New definitions are added: **Forest Product Turnover, Total annual turnover, Staff headcount**. • Withdrawal of FSC-PRO-40-003 and FSC-PRO-40-003a. • Incorporating INT-STD-40-003_01 and INT-STD-40-003_03. **3. Setting up of group certification (Question 36)** **Background:** Current requirements restrict a group certification to sites within the same country and limit the number of participating sites to 500. Meanwhile, sites within a multi-site certification have no such restrictions. Due to this restriction, the same central office is required to establish more than one certification. Regarding the limitation that sites must be within the same country, removing this restriction will provide further flexibility in the implementation of CoC group certification. A central office requires the necessary language	**Q 37b**: Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended) **Q 38**: Please provide any additional feedback related to multi-site/ group certification.

Sections	Background information & Key changes	Questions
	and other capacities to manage, support, and conduct annual audits of participating sites. **Key changes:** • Removing the limitation on the maximum number of participating sites. • Removing the eligibility criteria that participating sites shall be located within the same country. **4. Central office's auditor qualifications (Question 37)** **Background:** The qualifications required for central office auditors for certifications involving more than 20 participating sites and are not linked by common ownership need to be revised to align with the requirements of certification bodies and uphold the integrity of the system. The change will not affect the current auditors who are working with central offices but do not meet the newly updated requirements. The new amendment will apply only to new auditors while allowing existing auditors to continue their work in the market. **Section(s)/ clause(s) in draft D1-0:** Clause 16.3.4 **Key changes:** • Amending clause 16.3.4; • Incorporating INT-STD-40-003_02.	
Annex 1	This Annex incorporates the requirements established in ADVICE-40-004-25, with no major change from the advice note contents.	

Sections	Background information & Key changes	Questions
Annex 2	This Annex incorporates the requirements established in ADVICE-40-004-18 V2-0. **Key changes:** • False claims will have 2 classifications, deliberate or non-deliberate • CBs make the first level assessment, in case of deliberate ones, FSC/ASI need to confirm the classification • Non-deliberate False Claims will no longer result in blockage. Instead, after 3 non-deliberate False Claim incidents, they will be designated as high-risk organization and will be required to use FSC Trace. Other CHs engaging in transactions with them (the high-risk organization) will also be required to use FSC Trace. • Clear requirements for CH making False Claims vs. CHs receiving False Claims	**Q39 a:** To what extent do you agree with the changes made in Annex 2 “Addressing False Claims”? **Q39 b:** Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)
Annex 3	**Background** This Annex provides the FSC CLR self-assessment, which is currently provided in Annex D of FSC-STD-40-004 V3-1. When the FSC CLR were introduced in the Standard, this Annex provided guidance on how the self-assessment related to the requirements on policy, self-assessment and the FSC core labour requirements (Section 7 in FSC-STD-40-004 V3-1). To streamline and simplify the standard, elements of this Annex have been removed, with consideration that these are better suited to guidance material rather than in the normative document. Additionally, stakeholder enquiries on the signatory and other questions for clarity have been considered, as well as acknowledgement for contractors with outsourcing agreements to be included, from ADVICE-40-004-23. **Key Changes:**	**Q40 a:** To what extent do you agree the revised self-assessment is clear and user-friendly? (Agree/Neutral/Disagree) **Q40 b:** Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)

Sections	Background information & Key changes	Questions
	• Simplification and reduction of questions for each FSC CLR • Addition of elements related to the location and outsourcing activities • Removal of the guidance instructions prefacing the self-assessment	
Annex 4	**Key changes** • Amended timeline for Corrective Action Requests (CARs) closure to align with the changes in FSC-STD-20-001; • Introduced Clause 16.4.6 and 16.4.7, together with Section 2 of Annex 4, to align with the introduction of remote audit in FSC-STD-20-011.	
Annex 5	The annexes from FSC-STD-40-007 V2-0 have been simplified and structured into a single table for clarity. **Key changes** • Focus on key examples of eligible reclaimed materials • Non-eligible materials have been moved to the application of Section 14. • Addition of new examples such as natural rubber, textiles, cork and bamboo	**Q41:** Please provide any suggestions for improvement or other examples of forest-based reclaimed materials not included.
Terms & Definitions	The Terms and definitions section has been revised to: • Include new terms; • Remove obsolete terms; and • Revise existing terms to add clarity. **Key changes on below definitions:** • Transformation (new) • Site (revised) • Sub-site (new)	**Q42 a:** To what extent do you agree with the changes made in “Terms and Definition”? **Q42 b:** Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)

Sections	Background information & Key changes	Questions
	• Group certification (new) • Multi-site certification (new) • Worker (revised and examples included) • Outsourcing and Outsourcing agreement (revised) • Subcontractor (new) • Finished products (revised) • False claims (revised) • Non-conforming products (revised) • Leasing and leasing document (new) • Staff headcount (new) • Non-forest-salvaged wood (new) • On-site audit (new) • Remote audit (new) • Forest Salvaged Wood (revised)	

Consultation Questions FSC-STD-20-011

Sections	Background information & Key changes	Questions
Section 1	No major change in this section except the incorporation of INT-STD-20-011_12 (verification of commitment to the Policy for Association) in Clause 1 e).	
Section 2	No changes in this section.	
Section 3	No changes in this section.	
Section 4	No changes in this section.	
Section 5	No changes in this section.	
Section 6	Requirements have been streamlined with other sections. **Key change:** • Incorporating INT-STD-20-011_28 (when non-FSC certified sales record need to be reviewed) • If on-site audit was not possible due to certain defined conditions, CBs can conduct a remote audit without asking for a derogation (Clause 6.2) • Evaluation requirements for take-back and leasing (Clause 6.1 j), k).	**Q1 a:** To what extent do you agree with the changes made in section 6 “Evaluation at the level of the site”? (agree, neutral, disagree) **Q1 b:** Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)
Section 7	**Background:** Currently, the same formula applies for the sampling of ‘normal-risk’ and ‘high-risk’ participating sites. Considering that the current formula should be sufficient to properly assess conformity at the level of the normal-risk participating sites (term changed to ‘low-risk participating sites’), as well as the overall performance of the central office in managing such sites, a risk-based approach has been applied, focusing on the high-risk participating sites, to be sampled at a higher rate when compared to low-risk sites.	**Q2 a:** To what extent do you support the change in Section 7 “Sampling of group and multi-site certification”? **Q2 b:** Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended) **Q3:** Please share any additional concerns or suggestions in relation to evaluation of

	With regards to the methodology for sampling sites and sub-sites, and for sampling of group certification with sites across countries, new clauses have been added to ensure a consistent approach among certification bodies. **Key changes:** • Definition of 'participating site' (revised); • Sampling methodology: 1.5 R √x, for high-risk participating sites; minor reduction on the risk index for the 're-evaluation' scoring; • New clause added on how to sample sites and sub-sites; • A new clause added on the sampling of group certification with sites in multiple countries.	multi-site and group certification requirements.
Section 8	No changes in this section.	
Section 9	No major changes in this section.	
Section 10	No major changes in this section. Terminology aligned with FSC-PRO-60-006b.	
Section 11	No major changes in this section. Terminology aligned with FSC-PRO-60-006b.	
Section 12	**Background** Requirements in this section have been revised on the criteria of high-risk outsourcing agreements and incorporated relevant advice note and interpretations. **Key changes** • Streamlining two risk scenarios (Risk of Mixing & CLR) • Sampling contractors based on two risk scenarios that are merged but is representative of both (Clause 12.7) • Revising high-risk criteria on both risk scenarios (Clauses 12.4 & 12.5)	**Q4 a:** To what extent do you agree with criteria of high-risk outsourcing agreements (risk of mixing)? **Q4 b:** Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended) **Q5 a:** To what extent do you agree with providing the option to reclassify a high-risk outsourcing agreement to low-risk, provided

- Provide clarification on evaluation of subcontractors and contractors of participating sites (Clauses 12.9 & 12.11)
- Requirement to include those contractors that their service was provided and their contract ended before the audit, in the sample poo (Clause 12.10)
- Requirement to include contractors whose services were provided and contracts ended before the audit in the sample pool (Clause 12.10)

Specific changes related to FSC CLR

Following the implementation of FSC CLR in FSC-STD-40-004, this resulted in questions around how to deal with outsourcing and ensure contractors with outsourcing agreements were evaluated to ensure they conform. ADVICE-40-004-23 V1-0 and its counterpart, ADVICE-STD-20-011-16 V1-0 were published in 2023 to provide instructions on how to do this, and further revised in 2024 (V2-0). The Advice Note contains the concepts of ensuring commitment through policy, outsourcing agreement terms, ensuring the contractors are covered in the Organization's self-assessment, and in the evaluation, providing criteria for high and low risk, with some flexibility provided for the CB to justify a lower risk classification. To streamline, elements of the Advice Notes have been incorporated, however rather than reference to various indices, there is now a general starting point of the FSC CLR Risk Matrix (see Section 14), matching the proposal for evaluation of FSC CLR for Organizations.

Section(s)/ clause(s) in draft D1-0: Clauses 12.5 - 12.6

Key Changes

- Incorporation of elements of ADVICE-20-011-16 V2-0
- Introduction of FSC CLR Risk Matrix
- Criteria for lowering risk classification including:
    - Physical inspection during past five-year certification cycle with no FSC CLR nonconformity

that there are evidence of risk mitigations by CH?

Q5 b: Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)

FSC CLR

Q6 a: To what extent do you agree with the approach for the requirements for evaluation of CLR for contractors to follow a similar approach to that of the evaluation of the Organization? (Agree/Neutral/Disagree)

Q6 b: Please provide your opinion on: (1) the clarity of the high-risk indicators; (2) any suggestions for improvement. (Open-ended)

Q7 a: Contractors will be sampled from two pools based on risk of mixing and CLR. To what extent do you agree with evaluation of contractors based on these two risk scenarios? (agree/neutral/disagree)

Q7 b: Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)

Q8 a: To what extent do you agree with the changes made in section 12 "Evaluation of contractors operating under outsourcing agreements"? (agree/neutral/disagree)

	○ First-/second-/third-party audit meeting provided criteria, including demonstrating the contractor's conformance to FSC CLR. **Supporting Documents:** • FSC CLR Risk Matrix and Methodology	**Q8 b:** Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)
Section 13	No major changes in this section.	
Section 14	**Evaluation of FSC core labour requirements** **Background** A large part of the current requirements provides for certification bodies to design their own process for ensuring the evaluation of the FSC CLR. Since the implementation of FSC CLR, there have been requests for clarifications and differences in approaches by CBs, leading to the need for calibration. Individualised approach for this new subject matter have highlighted the need for a more consistent common approach that incorporates an enhanced 'risk-based' methodology. With this in mind, and following more recent normative developments for evaluation of FSC CLR for non-FSC-certified contractors with outsourcing agreements (ADVICE-40-004-23 V2-0 and ADVICE-20-011-16 V2-0), FSC have developed a matrix considering publicly available indices to provide risk classification per FSC CLR at a country level, meaning all CBs will have the same gauge of reference, with still some flexibility to reduce the provided classification based on past evaluation or the existence of other audits covering FSC CLR. In addition to this new matrix, the draft includes the proposal for sampling for interviews, to ensure a minimum number of people are interviewed for FSC CLR during an audit. **Key Changes:** • FSC-defined risk matrix for risk classification per FSC CLR per country as basis for the FSC CLR evaluation • Indicators for the CB to justify the lowering of the risk classification	**Q9 a:**Do you generally support the provision of a risk classification per country for each FSC CLR provided by FSC? (Yes/Neutral/No) **Q9 b:** Please provide detail of any concern(s) you have regarding the FSC CLR matrix approach. (Open-ended) **Q 10a:** Do you agree with the provision of indicators to lower the FSC CLR Risk Matrix risk classification by one (1) level? (Yes/Neutral/No) **Q11:** What other indicators would you include, for the certification body to justify lowering the risk classification? Please provide comment(s) and example(s). (Open-ended) **Q12 a:** To what extent do you support the suggested sampling formulae for "high" and "medium" risk for determining minimum number of persons to interview? (Disagree/Neutral/Agree) **Q12 b:** Instead of the sampling formulae, would you prefer a table with ranges for

	• Sampling formulae for determining the minimum number for interviews **Supporting Documents:** • FSC CLR Risk Matrix and Methodology	number of persons alongside the minimum number for each range? (Yes/Neutral/No) **Q12 c:** Please provide an alternative sampling formulae, or other suggestion(s) to facilitate a risk-based approach to CLR evaluation, including your rationale for the proposal(s) (Open-ended)
Section 15	**Key changes:** • Incorporating generic derogation DER-STD-20-001_01 (Clause 15.3) • If a standard is revised, no surveillance audit is permitted to be waived (Clause 15.6) • No audit waive for organizations designated as having high-integrity risk (ADVICE_20-011-12 Clause 15.5.1)	**Q13 a:** To what extent do you agree with the changes made in Section 15 “Surveillance evaluations”? **Q13 b:** please provide your rationale to the question above.
Section 16	**Nonconformities (in group and multi-site certification)** **Background** Participating sites are required to address any corrective action requests (CARs) issued by either the central office or the certification body, following the same timelines. If the certification body issues the same nonconformity as was identified during the central office audit, it might generate a duplication in reporting with no direct benefit. Certification bodies may still issue related nonconformities due to, for example, insufficient/ inappropriate corrective actions to address the root cause, or if the required timelines have not been met. **Section(s)/ clause(s) in draft D1-0:** Clause 16.4 **Key changes:** • New clause to avoid duplication of CARs.	**Q14 a:** To what extent do you support the change in Clause 16.4 on issuance of non-conformities to participating sites? **Q14 b**: Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)
Section 17	No major changes in this section.	

Section 18	No major changes in this section.	
Section 19	No major changes in this section. Terminology aligned with FSC-PRO-60-006b.	
Annex 1	Key changes in the evaluation report: • Total number of workers (Section 1) • Evaluation method (Section 3) • If a derogation has been used for the audit (Section 3)	
Annex 2	No major changes in this section.	
Annex 3	No major changes in this section.	
Annex 4	No major changes in this section.	
Annex 5	This Annex provides the requirements for remote and hybrid audits. The emphasis of these audit methods is using ICT applications. **Key changes:** • New terms defined for remote, hybrid, onsite audit as well as audit method. • For a fully remote audit, pre-requisite defined (Clauses 2.1 & 2.2 of Annex 5). • Table 3 defines low-risk organization/ sites eligible for remote audit.	**Q15 a:** To what extent do you agree with the requirements in Annex 5 “Remote and Hybrid Audit”? **Q 15b:** Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended) **Q 16 a:** To what extent do you agree with defined pre-requisites defined in clause 2.1 & 2.2 of the Annex? **Q16 b:** Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)

		Q17 a: To what extent do you agree with the list of organizations designated as low-risk in Table 3? (Agree, neutral, disagree) **Q17 b:** In your opinion, what other organizations can be considered low-risk to be eligible for fully remote audit?
Annex 6	This Annex provides requirements for certification bodies to address False Claims and incorporates the CB requirements of ADVICE-40-004-18 V2-0 **Key changes:** • CBs will classify the False Claim (Clause 1.1 of Annex) • Deliberate False Claims need to be confirmed by FSC/ ASI (Note under Clause 1.3 of Annex) • 2 classifications instead of 3 (Clause 1.1 of Annex) • CBs need to submit False Claim relevant documents within 30 days of finalization of audit report (Clause 1.3 of Annex)	**Q18 a:** To what extent do you agree with the requirements in Annex 6 “Addressing False Claims”? (Agree, neutral, disagree) **Q18 b:** Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended) **Q19 a:** To what extent do you agree with timeframe for submitting relevant False Claim documents? (Agree, neutral, disagree) **Q19 b:** Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)