



FSC CLR RISK MATRIX (DRAFT)

Supporting reference document on the draft proposal for the
'FSC CLR Risk Matrix' referenced in FSC-STD-40-004 V4-4
D1-0 and FSC-STD-20-011 V4-4 D1-0

Title: FSC CLR Risk Matrix (Draft)

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INTRODUCTION

This document acts as a supporting document for the public consultation of the proposed 'FSC CLR Risk Matrix' referenced within the drafts FSC-STD-40-004 V4-0 D1-0 and FSC-STD-20-011 V4-4 D1-0. This matrix supports a risk-based approach to the evaluation of the FSC core labour requirements (CLR). The evaluation requirements for FSC CLR are currently provided in Section 14 of FSC-STD-20-011 V4-3.

This document provides a brief summary of the methodology behind the matrix (see Methodology) and the matrix itself (see FSC CLR Risk Matrix (Example)), which includes a list of countries in the form of a table, providing a risk classification for each FSC CLR: child labour, forced labour, discrimination, and freedom of association. FSC CLR are provided in the current version of the Chain of Custody Standard (FSC-STD-40-004 V3-1) in Section 7, with the revised draft requirements provided in Section 8 of the draft (FSC-STD-40-004 V4-0 D1-0).

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1. Summary and Methodology

Summary

This matrix provides a classification per country or territory as 'low', 'medium' or 'high' for each FSC CLR. Eight (8) publicly available data sources were used to create this matrix, to cover the general operational landscape of the country, and the rights linked to the FSC CLR: forced labour, child labour, discrimination and freedom of association and collective bargaining. The assessment and allocation of saliency level is only general and not related to any performance level of any FSC-certified Organizations in a country or territory.

This matrix is proposed to be used for reference to provide a more simplified approach to how Organizations and non-FSC-certified contractors are evaluated for conformity to the FSC CLR within the FSC Chain of Custody Standards. The indicators provide a general risk classification level for each FSC CLR, which can be taken into account by the certification body in its evaluation of FSC CLR, as provided in the proposed requirements in FSC-STD-20-011 V4-4 D1-0 (Sections 12 and 14).

Methodology

Reputable publicly available reports and data sets were identified for each indicator (FSC CLR), reviewed, and allocated a classification of 'low', 'medium' or 'high'. For example, for the results that rank countries by percentage or numerically, these were split into three (3) percentiles, with an allocation of 'low', 'medium' or 'high'. This approach follows previous allocation of 'low risk' or 'high risk', such as for the evaluation of outsourcing agreements in Section 12 of FSC-STD-20-011 V4-3, which provides for a 'high risk' classification for outsourcing activities in other countries where the Transparency International Corruption Perception Index (CPI) is 'lower than 50' (Clause 12.2 e)). Rather than a binary approach, an additional level (medium) is included in this proposal. The final classification for each FSC CLR per country is based on the combination of the sources; where more than one data source is used for the indicator, the higher classification was assigned e.g., if one is 'high' and another 'medium', the 'high' rating is assigned overall for that specific FSC CLR.

For countries, which do not have data for one or more of the FSC CLR, the general classification was used, signified by the 'a.' prefix to describe that this rating is 'adjusted'. This follows the logic that without defined information, a general view of governance substitutes the missing information. This governance view includes consideration of a familiar reference, Transparency International's Corruption Perceptions Index (see Section 12 of FSC-STD-20-011 V4-3). Additionally, for those with existing FSC Risk Assessments (formally known as FSC Controlled Wood Risk Assessments), this information was also considered in the overall general classification, with reference to the labour rights indicator (see [Background Data Sources](#) for more information).

Background Data Sources

General

This considers the general governance landscape of the country/region in terms of rule of law and corruption. Below provides a brief summary of the sources referenced:

- **World Bank's World Governance Indicators (1996 – 2023, updated 2024)**
This provides a country comparison of governance across the following six (6) dimensions over the a distinct time period: Voice and Accountability, Political Stability and Absence of Violence/Terrorism, Government Effectiveness, Regulatory Quality, Rule of Law, and Control of Corruption.
- **Transparency International's Corruption Perceptions Index (2024)**
This provides a ranking of one hundred and eighty (180) countries and territories based on perceived levels of corruption, resulting in a scale of 0 signifying 'highly corrupt' to 100 signifying 'very clean'. Each country is assigned a level 'score'.

- **FSC Risk Assessment (where applicable)**

For the countries with existing FSC Controlled Wood Risk Assessments, the indicator of '2.2 Labour Rights' provides for the country to be considered as 'low', 'differentiated', or 'specified'. There are currently 60 countries with a risk assessment.¹

FSC CLR

Child Labour

- **'Percentage of children aged 5-17 years engaged in child labour'**

This main source of the information provided in this dataset from UNICEF is collected through questionnaires, providing a percentage per country/territory.

Forced Labour

- **Trafficking in Persons Report (2024)**

This report provides a ranking of 193 countries based on compliance with US standards, based on perceived effort to acknowledge and combat human trafficking. These tiers range from Tier 1 to Tier 3, with Tier 3 indicating failure to meet the minimum standards and '*are not making significant efforts to do so*'.

- **Global Slavery Index**

This provides a report from the Walk Free Foundation, which is based on national estimates of modern slavery for 160 countries. This referenced information is the vulnerability score, provided as a percentage (0-100%) per country.

Discrimination

- **WJP Rule of Law Index: Equal treatment and absence of discrimination (2013-2024)**

This data set from the World Bank Group provides a score for 142 different economies, with one (1) signifying the highest score, and zero (0) the lowest score. The scores closer to 1 signify economies considered having more equal treatment and absence of discrimination.

Freedom of Association and Collective Bargaining

- **ITUC Global Rights Index (2025)**

This index provides the results of an annual study on workers' rights violations, with a rating system of 1 to 5+, with 5+ indicative of, '*No guarantee of rights due to the breakdown in rule of law*'.

For more information on the sources of the datasets and reports referenced, see Source References for website links.

Source References

Corruption Perception Index 2024, Transparency International (2025), Retrieved from: <https://www.transparency.org/en/cpi/2024>

FSC Controlled Wood Risk Assessment Dashboard, Forest Stewardship Council, Accessed on 08/10/2025. Retrieved from: <https://connect.fsc.org/fsc-risk-assessments#dashboard-on-existing-cwra>

Global Rights Index 2025, International Trade Union Confederation, Accessed on 23/05/2025. Retrieved from: <https://www.ituc-csi.org/global-rights-index-2025> .

Global Slavery Index , 2023, Walk Free Foundation. Retrieved from: <https://www.walkfree.org/global-slavery-index/> "Percentage of children aged 5-17 years engaged in child labour" dataset, UNICEF, Accessed on 01/06/2025. Retrieved from: <https://data.unicef.org/topic/child-protection/child-labour/>

¹ Relevant indicators in FSC risk assessments following FSC-PRO-60-006b V2-0 are provided in brackets: child labour (27,28), forced labour (29,30), discrimination (38,39), and freedom of association (31,32).

“Trafficking in Persons Report”, United States Department of State, June 2024. Retrieved from: https://www.state.gov/wp-content/uploads/2025/02/TIP-Report-2024_Introduction_V10_508-accessible_2.13.2025.pdf

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Worldwide Governance Indicators, 2024 Update, World Bank (www.govindicators.org), Accessed on 10/30/2024. Retrieved from: www.worldbank.org/en/publication/worldwide-governance-indicators.

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2. FSC CLR Risk Matrix (Example)

Table 1 provides nine (9) example countries with risk classifications for each FSC CLR. The countries were selected at random for inclusion² and are provided in alphabetical order.

Country/Territory	Child Labour	Forced Labour	Discrimination	Freedom of Association
Colombia	Low	Medium	High	High
Italy	a.Low	Medium	Low	Low
Lebanon	a.High	High	High	High
Pakistan	Medium	High	High	High
Puerto Rico	a.Medium	a.Medium	a.Medium	a.Medium
Senegal	Medium	Medium	Low	High
Türkiye	Medium	Medium	a.Medium	High
Uganda	High	High	High	High
Ukraine	Low	Medium	Low	High

Table 1 FSC CLR Risk Matrix

² Microsoft Bing's 'random number generator' was used after assigning each country a number from one (1) to two hundred and two (202).



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