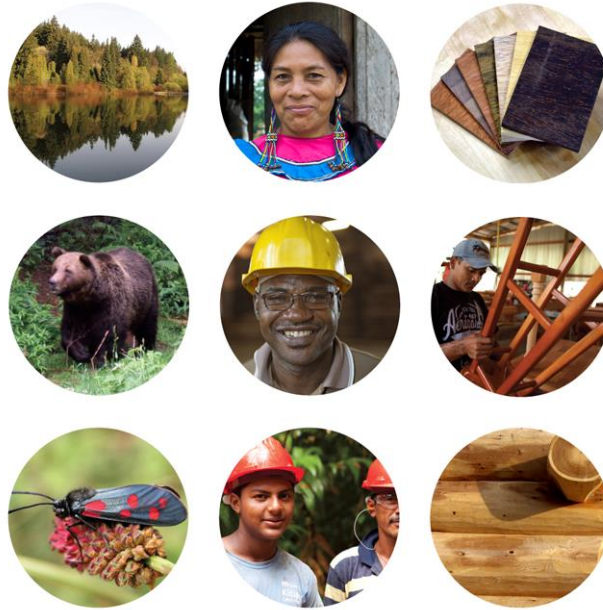




Forest Stewardship Council®



# Interpretations of the normative framework

CONTROLLED WOOD

16 January 2018



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## STANDARDS

### **FSC-STD-20-012 (V1-1) STANDARD FOR EVALUATION OF FSC CONTROLLED WOOD IN FOREST MANAGEMENT ENTERPRISES**

<b>Code</b>	INT-STD-20-012_01 (also published under FSC-STD-30-010 with code INT-STD-30-010_06)
<b>Requirement (s)</b>	Clause 1.1
<b>Publication date</b>	10 July 2015
<p><b>1) Is the conversion of plantations that have previously been established on agricultural land back to agricultural land acceptable according to the requirements of FSC-STD-30-010 (Clause 6.1)?</b></p> <p><b>2) Are abandoned (unmanaged) plantations established on agricultural land and destined for conversion back to agricultural land eligible for certification according to FSC-STD-30-010?</b></p> <p>1) Yes. Only conversion of natural and semi-natural forests and other wooded ecosystems such as woodlands and savannahs to plantation or non-forest uses is not allowed according to the standard (with exceptions specified in Clause 6.3).</p> <p>2) No. The certification of abandoned or unmanaged plantations does not meet the intent of the standard, which is designed for application by forest management enterprises (FMEs) at the forest management unit (FMU) level. According to the definitions of FME and FMU, the implementation of the standard involves forest management, which shall not be downgraded to clear cutting of plantations.</p>	

<b>Code</b>	INT-STD-20-012_02 (also published under FSC-STD-30-010 with code INT-STD-30-010_07)
<b>Requirement (s)</b>	Sections 3-7
<b>Publication date</b>	Previous version: 9 August 2015; this Version: 16 January 2018
<p><b>According to Clause 7.4 of FSC-STD-20-012 V1-1, “A non-compliance shall be considered major if, either alone or in combination with further non-compliances of other indicators, results in, or is likely to result in a fundamental failure to achieve the objectives of the standard in the forest management unit(s) within the scope of the evaluation.”</b></p> <p><b>How shall this be interpreted when considering non-compliances with requirements relating to the five Controlled Wood categories (Sections 3-7 of FSC-STD-30-010 V2-0)?</b></p> <p>Non-compliances for requirements relating to the five Controlled Wood categories (Sections 3-7 of FSC-STD-30-010 V2-0) shall always be considered major. As per Clauses 7.6 and 7.7 of FSC-20-012 V1-1, the certification body shall not issue or reissue a certificate if there is a major non-compliance with the requirements of the standard, and the certificate shall be suspended in case a major non-compliance is identified after the Controlled Wood certificate has been issued. The note under Clause 7.6 of the standard does not apply to major non-compliances for Controlled Wood categories.</p> <p>Minor non-compliances are possible only in instances where requirements for Sections 1 and 2 of FSC-STD-30-010 V2-0 are not implemented correctly, and/or the status of the material as “FSC Controlled Wood’ is not affected.</p>	

<b>Code</b>	INT-STD-20-012_03
<b>Requirement (s)</b>	Clauses 7.6-7.7
<b>Publication date</b>	01 July 2016
<p>Is restoration of converted forests containing high conservation values required to close a major corrective action request issued according to Clause 6.3 in FSC-STD-30-010 V2-0?</p> <p>No, the standard does not specify the action to be taken to address such a corrective action request. In the context of this standard, a certificate shall be suspended when a major nonconformity is identified (Clause 7.7). It is the responsibility of the organization to implement appropriate measures to correct the nonconformity in order to lift the suspension.</p>	

## **FSC-STD-30-010 (V2-0) FSC CONTROLLED WOOD STANDARD FOR FOREST MANAGEMENT ENTERPRISES**

<b>Code</b>	INT-STD-30-010_01 (also published under FSC-STD-40-005 with code INT-STD-40-005_02)
<b>Requirement (s)</b>	FSC-STD-30-010
<b>Publication date</b>	31 January 2012
<p><b>Within a National Initiative “unspecified risk” category, is it possible for a company to classify a smaller district as “low risk”?</b></p> <p>No, unless done at the FMU level through the process described in Annex 3 of FSC-STD-40-005. According to this standard, where national or regional interpretation or guidance relating to Annex 2 has been provided by an FSC accredited National Initiative, this interpretation shall prevail.</p> <p>Other option would be that the Forest Manager got certified according to FSC-STD-30-010.</p>	

<b>Code</b>	INT-STD-30-010_06 (also published under FSC-STD-20-012 with code INT-STD-20-012_01)
<b>Requirement (s)</b>	Section A (Scope), Clause 6.1
<b>Publication date</b>	10 July 2015
<p><b>1) Is the conversion of plantations that have previously been established on agricultural land back to agricultural land acceptable according to the requirements of FSC-STD-30-010 (Clause 6.1)?</b></p> <p><b>2) Are abandoned (unmanaged) plantations established on agricultural land and destined for conversion back to agricultural land eligible for certification according to FSC-STD-30-010?</b></p> <p>1) Yes. Only conversion of natural and semi-natural forests and other wooded ecosystems such as woodlands and savannahs to plantation or non-forest uses is not allowed according to the standard (with exceptions specified in Clause 6.3).</p> <p>2) No. The certification of abandoned or unmanaged plantations does not meet the intent of the standard, which is designed for application by forest management enterprises (FMEs) at the forest management unit (FMU) level. According to the definitions of FME and FMU, the implementation of the standard involves forest management, which shall not be downgraded to clear cutting of plantations.</p>	

<b>Code</b>	INT-STD-30-010_04
<b>Requirement (s)</b>	Clause 1 e) (Note)
<b>Publication date</b>	21 August 2013

**How should the nationally developed HCV Framework be applied according to the standard FSC-STD-30-010?**

The standard FSC-STD-30-010 requires, that the Forest Management Enterprise shall consider guidance that may be provided by FSC International, FSC regional offices, or by FSC accredited national initiatives in relation to interpreting the requirements of FSC-STD-30-010 in a particular national or sub-national context.

There is an approved 'High Conservation Values (HCVs) evaluation framework for use in the con-text of implementing FSC Certification to the FSC Principles and Criteria and Controlled Wood standards' developed by FSC Australia. The following questions aim to clarify how to implement the Framework.

**How shall requirements be interpreted that use the term 'consider' – are all the elements of the Framework mandatory? Or can the FME select which elements they deem to be relevant?**

**Do all of the steps need to be followed for each HCV1-6? Note that some of the steps have been pointed out to be contradictory.**

**Is there any difference in the Framework requirements for SLIMF or plantation forest?**

FME shall use approved HCV Framework and apply all its elements relevant for FME. In case of contradiction these shall be reported to relevant FSC National Partner and PSU.

SLIMF: HCV Framework serves mainly for HCV identification. Annex 2 of FSC-STD-30-010 (5.2) requires HCVs identification, thus HCV Framework shall be used in SLIMF operations.

Plantation: Framework shall also be used for plantations when relevant as per Framework contents.

<b>Code</b>	INT-STD-30-010_02
<b>Requirement (s)</b>	Clause 3.2, Intent Box.
<b>Publication date</b>	4 May 2012

**In countries where there is an approved FSC National Standard, how should approved elements in the national standard which could equally pertain to the interpretation and application of Controlled Wood (FSC -STD-30-010 V2-0) be regarded?**

Where elements of an approved national standard can be equally applied to the interpretation and application of Controlled Wood in a given country, these elements shall be applied in relation to the specific category of Controlled Wood; e.g. advice in the national standard on the assessment of legal compliance.

<b>Code</b>	INT-STD-30-010_07 (also published under FSC-STD-20-012 with code INT-STD-20-012_02)
<b>Requirement (s)</b>	Sections 3-7
<b>Publication date</b>	Previous version: 9 August 2015; this Version: 16 January 2018
<p><b>According to Clause 7.4 of FSC-STD-20-012 V1-1, “A non-compliance shall be considered major if, either alone or in combination with further non-compliances of other indicators, results in, or is likely to result in a fundamental failure to achieve the objectives of the standard in the forest management unit(s) within the scope of the evaluation.”</b></p> <p><b>How shall this be interpreted when considering non-compliances with requirements relating to the five Controlled Wood categories (Sections 3-7 of FSC-STD-30-010 V2-0)?</b></p> <p>Non-compliances for requirements relating to the five Controlled Wood categories (Sections 3-7 of FSC-STD-30-010 V2-0) shall always be considered major. As per Clauses 7.6 and 7.7 of FSC-20-012 V1-1, the certification body shall not issue or reissue a certificate if there is a major non-compliance with the requirements of the standard, and the certificate shall be suspended in case a major non-compliance is identified after the Controlled Wood certificate has been issued. The note under Clause 7.6 of the standard does not apply to major non-compliances for Controlled Wood categories.</p> <p>Minor non-compliances are possible only in instances where requirements for Sections 1 and 2 of FSC-STD-30-010 V2-0 are not implemented correctly, and/or the status of the material as “FSC Controlled Wood” is not affected.</p>	

<b>Code</b>	INT-STD-30-010_08
<b>Requirement (s)</b>	Section 4
<b>Publication date</b>	03 May 2017
<p><b>1) The term ‘Traditional and Indigenous Peoples groups’ could be broken into ‘Traditional groups’ and ‘Indigenous Peoples groups’. It could also be broken down into ‘Traditional Peoples groups’ and ‘Indigenous Peoples groups’. Which is the correct reading?</b></p> <p><b>2) What is the definition of ‘Traditional Peoples’ and ‘Indigenous Peoples’?</b></p> <p><b>3) What is the timeframe for ‘long established custom or traditional occupation and use’?</b></p> <p>1) The correct reading is ‘Traditional Peoples groups’ and ‘Indigenous Peoples groups’.</p> <p>2) The definitions as provided in the ‘<i>FSC Principles and Criteria for Forest Stewardship</i>’ (FSC-STD-01-001 V5-2) apply:</p>	



Traditional Peoples: Traditional Peoples are social groups or peoples who do not self-identify as Indigenous and who affirm rights to their lands, forests and other resources based on long established custom or traditional occupation and use (Source: Forest Peoples Programme (Marcus Colchester, 7 October 2009)).

Indigenous Peoples: People and groups of people that can be identified or characterized as follows:

- The key characteristic or criterion is self-identification as Indigenous Peoples at the individual level and acceptance by the community as their member
- Historical continuity with pre-colonial and/or pre-settler societies
- Strong link to territories and surrounding natural resources
- Distinct social, economic or political systems
- Distinct language, culture and beliefs
- Form non-dominant groups of society
- Resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities.

(Source: Adapted from United Nations Permanent Forum on Indigenous Issues, Factsheet 'Who are Indigenous Peoples' October 2007; United Nations Development Group, 'Guidelines on Indigenous Peoples' Issues' United Nations 2009, United Nations Declaration on the Rights of Indigenous Peoples, 13 September 2007).

3) There is no specific timeframe defined by FSC. Communities or persons can acquire customary rights by various means which can be long term (living in an area for a longish period of time) or short term (opening up a new area in line with customary law or via transfer). Thus, under customary law, what is important is not how long a person or community has been on the land but the means by which they acquired or asserted their rights.

<b>Code</b>	INT-STD-30-010_05
<b>Requirement (s)</b>	Clause 4.2
<b>Publication date</b>	19 May 2014
<p><b>Shall the certification body issue a non-compliance against Clause 4.2 and/or 4.5 of FSC-STD-30-010 where a minority of stakeholders do not agree on the dispute resolution process?</b></p> <p>Non-conformity against Clause 4.2 shall be issued in cases where a stakeholder(s) that is one of the main parties in the dispute disagrees with the resolution process. Non-conformity against Clause 4.2 shall not be issued in cases where the stakeholder(s) that disagrees is not one of the main parties to the dispute.</p> <p>The main parties to the dispute are those who are directly involved in the dispute (e.g. complainants/plaintiffs and defendants to which the claim is made against).</p>	

<b>Code</b>	INT-STD-30-010_03
<b>Requirement (s)</b>	Section 6
<b>Publication date</b>	8 February 2013

**The use of the present tense (*being converted; take place, etc.*) suggests that FSC accepts conversion that has happened in the past. But until when? What is the cut-off date?**

The cut-off date for FSC certification for controlled wood for forest management enterprises is the date when the organization signs the certification agreement with the CAB as this document includes the general requirement to adhere to all applicable rules and regulations as published by FSC (see FSC-STD-20-001 V3-0 Clause 7.2 c).

<b>Code</b>	INT-STD-30-010_10
<b>Requirement (s)</b>	Section 5 and 6
<b>Publication date</b>	16 January 2018

**There is a diversity of opinion among experts and scientific studies on how logging activities in Karri forests impact RTE species. In particular, it is unclear whether or not the reforestation and silviculture procedures applied by organizations constitute a conversion from the natural variation of mixed and karri dominated forests to forest stands of predominantly karri.**

**While the organization's procedures may require that a mix of tree species is replaced where a mixed forest has been harvested, it may not require that the mix of reforested trees be estimated on the proportion of each tree species in the stand at the time of harvest. This is because the proportion of each tree species at the time of planting does not predicate the final proportion in a mature stand, since natural disturbance (especially fire) will shape the stand as it grows. However, a lack of regulation on the proportions planted allows for reforested mixed stands to contain a mix of species that is predominantly karri even if karri was not the dominant tree species to begin with. This may lead to conversion of mixed forests over time. HCV 1 Rare Threatened and Endangered (RTE) species that rely on other tree species within the karri and mixed forests in the FMU are potentially negatively affected by the loss of mixed forest stands because they show preference for marri trees, which tend to create better hollows. However, this is not firmly established and hollow nesting species will use karri trees, but it is not known what impact the loss of mixed forest stands would have on these RTE species.**

**Against the background of uncertain unscientific knowledge,**

- 1. Do the activities of the organization need to be restricted / adjusted, taking the prerequisite of a precautionary approach into consideration so that conversion and/or deterioration of forest ecosystems are prevented, and**
- 2. Does FSC's standard requirements for conversion in FSCSTD-30-010 need to be adapted or whether more scientific information be sought by FSC so that there is a resolution of this dispute**

- 1) Deterioration of forest containing HCV 1, including changes in species composition and the forest structure in management/regeneration cycle shall be considered as a threat to HCV values. Considering a precautionary approach, as well as requirements in Section 5 of the standard, the organization shall ensure that deterioration of the forest ecosystems is prevented. This can be demonstrated by compliance with Section 5 of the standard.

- 2) The provided information is not sufficient for FSC to conclude whether ongoing forest management practices will lead to conversion. FSC recommends further research to be conducted by FSC Australia in this regard.

<b>Code</b>	INT-STD-30-010_09
<b>Requirement (s)</b>	Clause 6.1
<b>Publication date</b>	18 July 2017

**In some concession areas, conversion is often being done through illegal logging and encroachment by parties other than the forest manager. As the primary objective is plantation management on such concessions, little or no effort is made to control the illegal conversion occurring in the natural forests.**

**Do the requirements of 6.1 apply to activities carried out by parties other than the forest manager or their contractors? To put another way, would uncontrolled illegal activities carried out by parties other than the FME resulting in conversion of forests to non-forest use on the FMU(s) included in the scope of the evaluation be a nonconformance with criterion 6.1?**

Yes. As FSC-STD-30-010 is applied at the level of the FMU, activities taking place in FMUs included in the scope of the certificate shall be considered in determining conformance with the requirements, regardless of who carries out the activities. Therefore, if forest conversion is occurring as the result of illegal activities within the FMU, this constitutes a nonconformance with Clause 6.1.

<b>Code</b>	INT-STD-30-010_11 (also published under FSC-STD-40-005 V3-1 under code INT-STD-40-005_24)
<b>Requirement (s)</b>	FSC-STD-30-010 V 2-0
<b>Publication date</b>	16 January 2018

- 1 What criteria may be used to determine the parameters for definition of a 'forest', for protection of Old Growth Type 2 'forest' in Australian context? Is it appropriate to use a minimum area in order to distinguish between a 'forest' and a tree, or line of trees?**
- 2 Is the intention that the NFSS will be issued soon and override the need for this interpretation?**

1. No, in Australian context it is not appropriate to use a minimum area in order to distinguish between an Old Growth Type 2 'forest' and a tree, or line of trees. This is because the key element in Type 2 in the FSC Australia HCV assessment framework (applicable for implementation of the standard FSC-STD-40-005) is the use of 'stand', as stated on page 13:

“(B) Type 2 Old Growth: stands that have been logged, but which retain significant late-successional/old-growth structure and functions. “

The commonly used definition of a stand is: "a contiguous area that contains a number of trees that are relatively homogeneous or have a common set of characteristics."

Accordingly, a stand should be used as the definition of 'forest' for Old Growth Type 2.

Because of the requirement to maintain HCV values (controlled wood) and maintain and enhance (FM certificates) in Australian normative framework, both areas of Old Growth type 1 and 2 have to be maintained and or enhanced. In practice, this means that all stands that meet the Old Growth category are protected with allowance made for removing individual trees (normally just 1) under legal permit for reasons such as:

- The tree would represent a health and safety risk in the forest
- There are genuine silvicultural reasons to remove a single tree e.g. access.

2. It is the intention that the CW and FM standards be harmonized so that there is only one set of HCV definitions applying in Australia.

This interpretation will be revised upon the approval of the Australian NFSS, containing provisions for minimum area threshold for identifying what constitutes an HCV Area.

## **FSC-STD-40-005 (V2-1) STANDARD FOR COMPANY EVALUATION OF FSC CONTROLLED WOOD**

<b>Code</b>	INT-STD-40-005_04 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_02)
<b>Requirement (s)</b>	Applies to all requirements where the CPI is mentioned
<b>Publication date</b>	6 September 2013
<p><b>In 2012 the Corruption Perception Index (CPI) changed from a scale of 0-10 to a scale of 0-100. Shall the new 0-100 CPI scale be implemented in FSC normative documents that currently still reference the previous 0-10 scale system?</b></p> <p>Yes, CPI references in FSC normative documents using the 0-10 scale system shall be converted to the new scale.</p> <p>A reference to a CPI index threshold '5' based on the old scale system becomes a CPI index '50' applying the new scale.</p>	

<b>Code</b>	INT-STD-40-005_06
<b>Requirement (s)</b>	Categories 2, 3, 4
<b>Publication date</b>	18 May 2014
<p><b>Can material originating from artificially submerged forests be evaluated according to the standard FSC-STD-40-005?</b></p> <p>Materials harvested from standing “dead” forests that have been e.g. submerged to construct water reservoirs or dams are eligible for evaluation under the FSC Controlled Wood Standard FSC-STD-40-005 V2-1. In this case the district shall be set at the submerged area in question.</p> <p>When evaluating conformance with the standard, special attention shall be given to the requirements of Controlled Wood Categories 2, 3 and 4, which, depending on circumstances, may be particularly challenging to be met.</p> <p>This interpretation supersedes any former interpretations relevant for this question.</p>	

<b>Code</b>	INT-STD-40-005_14 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_10)
<b>Requirement (s)</b>	7.1
<b>Publication date</b>	9 July 2014
<p><b>Can timber of unknown origin collected from beaches be evaluated according to the standard FSC-STD-40-005?</b></p> <p>No, timber collected from beaches is not eligible for evaluation under the FSC Controlled Wood Standard FSC-STD-40-005 V2-1.</p>	
<b>Code</b>	INT-STD-40-005_16 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_11)
<b>Requirement (s)</b>	9.1
<b>Publication date</b>	10 October 2014

**If a certified company sources material that has previously been FSC certified or covered by another company’s FSC Controlled Wood verification program but has since been traded by a non-certified company (therefore breaking the Chain of Custody), can this material be considered controlled with-out conducting a full verification program and risk assessment?**

For previously FSC-certified material from a broken Chain of Custody to be considered as FSC Controlled Wood, the company must trace the material back to the certified company that traded it to the non-certified company where the Chain of Custody was broken, and conduct an audit of the supply chain. This audit shall demonstrate with verifiable documentation that the material is identifiable and traceable and has not been mixed with uncontrolled material.

For previously controlled material from a broken Chain of Custody to be considered as FSC Controlled Wood, the district of origin must be determined within/through the company’s own Controlled Wood verification program, for which all relevant normative requirements apply. For this purpose, risk assessments performed by other entities (e.g. a supplier with a valid FSC certificate that includes FSC Controlled Wood in its scope that sold FSC Controlled Wood (without a claim) to a non-certified entity) may be used as additional sources of information.

<b>Code</b>	INT-STD-40-005_11 V2-1 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_07)
<b>Requirement (s)</b>	Section 11
<b>Publication date</b>	9 July 2014

**In cases where there is an approved national risk assessment, is it acceptable for the certificate holder to use the National Risk Assessment to satisfy the controlled wood requirements for conducting a risk assessment as specified in FSC-STD-40-005 and FSC-DIR-40-005, rather than having to generate its own risk assessment?**

The use of approved National Risk Assessments (NRAs) for sourcing Controlled Wood according to FSC-STD-40-005 is mandatory. Certificate holders have different options for aligning their verification programs with the results of applicable NRAs. Certificate holders may, for example, use NRAs available on FSC’s website and/or the Global Forest Registry, or generate or update a new or existing company-developed risk assessment with the risk designation(s) provided in relevant NRAs. These examples are not exhaustive.

<b>Code</b>	INT-STD-40-005_05 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_03)
<b>Requirement (s)</b>	Clause 11.1
<b>Publication date</b>	5 February 2014

**Which process shall be implemented if a certified FMU is under suspension in a district that has been designated as low risk for all CW categories either by a National Risk Assessment or by a COC Certificate Holder in their FSC Controlled Wood verification pro-gram when the COC Certificate Holder wants to source from this FMU?**

At the moment of suspension, the products sold by the certified FMU\* are losing their FSC status. As the FMU is located in a designated low risk district for CW, the products may still be sourced as “controlled material” under the following conditions:

1. As some or all CW categories may be affected by activities that led to the suspension of the FMU, the COC Certificate Holder shall review and if necessary revise their risk assessment for the area of the suspended FMU.
2. The review/revision of the risk assessment shall be completed by the COC Certificate Holder within a period of two months from the date of suspension of the FMU certificate.
3. The COC Certificate Holder shall submit the reviewed/revise risk assessment to their CB for verification.
4. The reviewed/revise risk assessment shall be verified by the CB no later than one month after the COC Certificate Holder has submitted its reviewed/revise risk assessment, before it can be applied (see FSC-STD-40-005 V2-1 Clause 11.1).
5. As the whole district is considered low risk, the products sourced from the suspended FMU are considered controlled until the verification of the reviewed/revise risk assessment is completed by the relevant CB.
6. The outcome of the review/revision process including verification by the relevant CB will then determine the risk designation for the suspended FMU.
7. Material sourced from the area shall be classified as unspecified risk, if the timelines of review/revision and verification of the risk assessment (2, 4) is not met.

\* according to the standard FSC-STD-01-001 or FSC-STD-30-010

<b>Code</b>	INT-STD-40-005_18 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_12)
<b>Requirement (s)</b>	Clause 13.2, Annex 3
<b>Publication date</b>	28 October 2014
<p><b>Shall the outcomes of a company verification program according to Annex 3 be made publicly available?</b></p> <p>No, currently there are no requirements for publishing the outcomes of verification according to Annex 3. The standard does not limit such an opportunity, however.</p>	

<b>Code</b>	INT-STD-40-005_08 V2-1
<b>Requirement (s)</b>	Section 14
<b>Publication date</b>	9 July 2014
<p><b>If a company receives a complaint regarding their risk assessment and/or company verification program, does it matter if the complainant identifies the complaint as formal or informal as per the FSC Dispute Resolution Process?</b></p> <p>No, it does not matter. The company is required to deal with all complaints that are received according to the requirements of Section 14 of FSC-STD-40-005, irrespective of the complaint classification by a complainant. Controlled Wood requirements for the handling of complaints by Certificate Holders are not subject to the FSC Dispute Resolution Process and shall be evaluated by the Certificate Holder, according to their own mechanism.</p>	

<b>Code</b>	INT-STD-40-005_09 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_05)
<b>Requirement (s)</b>	Annex 1
<b>Publication date</b>	9 July 2014
<p><b>With regards to Category 3 (HCV), what is the minimal level of detail for describing the sourcing in the district of origin in the published company risk assessment? If the district of origin includes potentially controversial sources, when the company describes their sourcing in this area, must the description of their sourcing explicitly state that they are not sourcing from controversial FMUs in that district?</b></p> <p>The minimum required information to be included in the publically available results of the risk assessment are provided in ADVICE 40-005-07 of FSC-DIR-40-005, which applies to all CW categories. In case of potentially controversial activities in FMUs located in a low risk district (See ADVICE 40-005-02 of FSC-DIR-40-005), a company should mention the existing FMUs with potential controversial activities in the publically available results of a risk assessment.</p>	



<b>Code</b>	INT-STD-40-005_15 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_04)
<b>Requirement (s)</b>	Annex 1
<b>Publication date</b>	9 July 2014

**How should companies treat ecoregions that are not within the WWF Global 200 but are listed as ‘critical/endangered’ or ‘threatened’ by WWF? Should this information always be included in risk assessments, under 3.1?**

The standard requires consideration of ‘ecoregionally significant HCVs’ and does not limit the recognition of ecoregions to Global 200 ecoregions. General references provided in the standard direct to WWF sources without limitation to Global 200 ecoregions (FSC-STD-40-005, Annex 1, definition of ecoregion). Therefore, information about threatened ecoregions other than the examples provided in FSC-STD-40-005 and FSC-DIR-40-005 should be taken into account. The company shall not ignore known and available sources of information in addition to the ones listed in normative documents.

<b>Code</b>	INT-STD-40-005_13 V2-1 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_09)
<b>Requirement (s)</b>	Annex 1
<b>Publication date</b>	9 July 2014

**Can a district of origin cover more than one country? If so, is a separate risk assessment required for each country, given the heterogeneity in assessing risk between two different sets of laws? What about within countries where the sub-national units (states, provinces, etc.) have the independence to create their own resource use and protection laws?**

According to its definition, a ‘district’ is considered to be a generic geographical definition within a country. Subject to the above, various guidance and requirements are provided stating that how a district shall be established depends on the CW category under assessment. In the case of National Risk Assessments (NRAs) it is possible to develop shared NRAs for countries sharing homogenous conditions (e.g. sharing the same ecoregions), according to the procedure FSC-PRO-60-002 V2-0 (FSC Controlled Wood Risk Assessments by FSC accredited National Initiatives, National and Regional offices).

Subject to the specific conditions of each CW category, the division of a country into sub-national units (e.g. states, provinces) will only impact how a district is defined if those divisions result in increased heterogeneity of the level or type of risk that is assessed within them.

<b>Code</b>	INT-STD-40-005_10 V2-1 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_06)
<b>Requirement (s)</b>	Annex 1
<b>Publication date</b>	9 July 2014

**Does the concept of ‘minimally disturbed by human economic activity’ in the definition of Intact Forest Landscape include fire suppression?**

Regarding definition of Intact Forest Landscape, firefighting or prevention for the protection of public safety is not considered an economic activity. Fire control in the context of forest management activities is not considered to be an economic activity of minimal disturbance.

<b>Code</b>	INT-STD-40-005_12 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_08)
<b>Requirement (s)</b>	Annex 2
<b>Publication date</b>	9 July 2014

**Is a CoC-certified harvesting company that DOES NOT own or manage the forest required to conduct a nature value assessment when conducting a risk assessment according to Annex 2 of FSC-STD-40-005, when a nature value assessment is required by the respective National Forest Stewardship Standard?**

No, a company that is conducting a risk assessment according to Annex 2 of FSC-STD-40-005 (V2-1) is not required to perform a nature value assessment, unless it is required by an approved national guidance as per Annex 2, part A, Clause 2 of FSC-STD-40-005 and/or as per FSC-DIR-40-005-09, Clause 3 (Advice).

<b>Code</b>	INT-STD-40-005_07 V2-1
<b>Requirement (s)</b>	Annex 2, part B, Section 2
<b>Publication date</b>	9 July 2014

**How should a risk assessment be conducted following Clause 2.5 when ILO 169 is not ratified?**

The standard does not refer to the ratification of ILO 169 and a risk assessment shall involve an assessment of evidence of violation of ILO requirements, irrespective of whether they have been ratified by the country in which the risk assessment is made.

<b>Code</b>	INT-STD-40-005_03
<b>Requirement (s)</b>	Annex 2 and 3.
<b>Publication date</b>	4 May 2012
<p><b>Can wood from plantations converted to non-forest use be acceptable according to Category 4 of CW Standard FSC-STD-40-005?</b></p> <p>Yes, wood from plantations converted to non-forest use is acceptable according to Category 4 of FSC-STD-40-005.</p>	

<b>Code</b>	INT-STD-40-005_01 V2-1
<b>Requirement (s)</b>	Annex 2, A.3
<b>Publication date</b>	8 December 2011
<p><b>What is the definition of FMU in FSC terms and does this definition count for all references to FMU in FSC Standards, including Controlled Wood?</b></p> <p>Yes, the definition of FMU is the same for all references in FSC Standards, including Controlled Wood.</p> <p>Forest Management Unit (FMU): A clearly defined forest area with mapped boundaries, managed by a single managerial body to a set of explicit objectives which are expressed in a self-contained multi-year management plan.</p> <p>The term 'management plan' is key and taken as equivalent to that which is described in FSC Principle 7.</p>	

<b>Code</b>	INT-STD-40-005_17 V2-1
<b>Requirement (s)</b>	Annex 3
<b>Publication date</b>	28 October 2014
<p><b>If a company risk assessment or applicable National Risk Assessment concludes 'unspecified risk' for a district and then field verification at the forest level by a company implementing Annex 3 concludes 'low risk', is it possible to use the outcomes from the field verification as a source of information/evidence in the risk assessment to conclude low risk at the level of the whole district?</b></p> <p>No, the field verification according to Annex 3 allows the verification of risk at the FMU level. The confirmation of low risk at the FMU level cannot be extrapolated to the district level.</p>	

<b>Code</b>	INT-STD-40-005_02 (also published under FSC-STD-30-010 with code INT-STD-30-010_01)
<b>Requirement (s)</b>	Annex 3
<b>Publication date</b>	31 January 2012

**Within a National Initiative “unspecified risk” category, is it possible for a company to classify a smaller district as “low risk”?**

No, unless done at the FMU level through the process described in Annex 3 of FSC-STD-40-005. According to this standard, where national or regional interpretation or guidance relating to Annex 2 has been provided by an FSC accredited National Initiative, this interpretation shall prevail.

Other option would be that the Forest Manager got certified according to FSC-STD-30-010.

<b>Code</b>	INT-STD-40-005_19
<b>Requirement (s)</b>	Annex 4
<b>Publication date</b>	2 July 2015

**An FSC Chain of Custody (CoC) certified manufacturer is making furniture (final product) for sale to a large international retailer that does not hold a CoC certificate. According to FSC-STD-40-005 V2-1, Annex 4, Clause 1.4, the CoC certified manufacturer cannot make a Controlled Wood claim on sales documentation for the furniture, since the retailer does not hold a CoC certificate.**

**Is there any claim or statement that the CoC company can make on or off product? Such a claim or statement may be asked for, for example, by retailers with responsible procurement policies or by importers wanting to meet legality legislation.**

No. FSC certificate holders are not allowed to promote Controlled Wood products or to make FSC Controlled Wood claims on sales documents issued to non-FSC certified customers.

## **FSC-STD-40-005 (V3-0 and V3-1) REQUIREMENTS FOR SOURCING FSC CONTROLLED WOOD**

<b>Code</b>	INT-STD-40-005_20
<b>Requirement (s)</b>	FSC-STD-40-005 V3-0
<b>Publication date</b>	03 June 2016
<p><b>The revised FSC-STD-40-005 V3-0 does no longer include requirements regarding sales claims related to FSC Controlled Wood (CW) as previously included in Annex 4 of FSC-STD-40-005 V2-1. Does this mean that these requirements are no longer valid when implementing FSC-STD-40-005 V3-0?</b></p> <p>No, the requirements included in Annex 4 of FSC-STD-40-005 V2-1 are still valid as they are already covered by other normative documents:</p> <ol style="list-style-type: none"> <li>1. The requirements for use of FSC trademarks for the promotion of FSC Controlled Wood (Clauses 1.1, 1.2, 1.3, 1.6, 1.9 and 1.10 of FSC-STD-40-005 V2-1 Annex 4) are covered by Clause 1.4 of FSC-STD-50-001 V1-2. The reference to FSC-STD-40-005 V2-1 Annex 4 shall be interpreted as the reference to this interpretation. Organizations supplying FSC Controlled Wood may use the statement “FSC Controlled Wood” as segregation mark during manufacturing or transportation processes or storage. The segregation marks shall always be accompanied by the FSC controlled wood certificate code issued by the certification body. Segregation marks with the statement “FSC Controlled Wood” shall be removed/deleted if products are reaching final points of sale and/or when the segregation marks could be interpreted as commercial labels.</li> <li>2. The requirements for sale of finished products as FSC Controlled Wood and sale of FSC Controlled Wood to non-FSC certificate holders (Clause 1.4 of FSC-STD-40-005 V2-1 Annex 4) are covered by footnote 4 of FSC-STD-40-004 V2-1. The term “trading” in the footnote shall be read as “commercialization”. The footnote is applicable to all FSC certificate holders, not only to traders. The reference to FSC-STD-40-005 V2-1 in the footnote shall be interpreted as the reference to this interpretation.</li> <li>3. The requirement for translation of the FSC Controlled Wood claim on sales and delivery documents (Clause 1.5 of FSC-STD-40-005 V2-1 Annex 4) is covered by INT-STD-40-004_07.</li> <li>4. The requirements for identification of sales documents of FSC Controlled Wood (Clauses 1.7, 1.8 and 1.10 of FSC-STD-40-005 V2-1 Annex 4) are covered by Clause 6.1.1 f, 6.1.1 g of FSC-STD-40-004 V2-1.</li> </ol>	

<b>Code</b>	INT-STD-40-005_21
<b>Requirement (s)</b>	FSC-STD-40-005 V3-1 Clause 4.8, Annex B clause 1.2
<b>Publication date</b>	16 January 2018
<p><b>Is the organization required to undertake stakeholder consultation in advance of each and every forest management activity covered by the DDS, as per Annex B, Clause 1.2 (FSC-STD-40-005 V3-1)?</b></p> <p>No, the organization is not expected to conduct stakeholder consultation in advance of each and every forest management activity. The frequency of the consultations needs to occur at</p>	

a rate adequate and proportionate to the risk caused by the management activity and shall be defined by the organization.

<b>Code</b>	INT-STD-40-005_22
<b>Requirement (s)</b>	FSC-STD-40-005 V3-1, Annex A, Controlled Wood Category 3 Clause 3.9 Indicator 3.2
<b>Publication date</b>	16 January 2018
<p><b>When the organization conducts stakeholder consultation to demonstrate that there is significant support to low risk designation by relevant national/regional stakeholders from the assessed supply area, consulted stakeholders may not respond. Can a lack of response to stakeholder consultation demonstrate evidence of significant support?</b></p> <p>No, the lack of a response to stakeholder consultation cannot be considered as evidence for significant support. Support to a low risk designation needs to be demonstrated by an affirmative and positive response from the stakeholders.</p>	

<b>Code</b>	INT-STD-40-005_23
<b>Requirement (s)</b>	<b>FSC-STD-40-005 V3-1 Annex A</b>
<b>Publication date</b>	16 January 2018
<p><b>FSC-STD-40-005 V3-1 Annex A Controlled Wood Category 3 Clause 3.9 (Examples of sources of information Indicator 3.1) reads:</b>  <i>'Forest, woodland, or mangrove ecoregions identified by World Wildlife Fund as a Global 200 Ecoregion and assessed by WWF as having a conservation status of endangered or critical. If the Global 200 Ecoregion comprises more than a single terrestrial ecoregion, an ecoregion within the Global 200 Ecoregion can be considered low risk if the sub-ecoregion has a Conservation Status other than 'critical' or 'endangered' (<a href="http://www.worldwildlife.org/science/wildfinder">www.worldwildlife.org/science/wildfinder</a>).'</i></p> <p><b>The use of the word "and" has limited the requirement to Global 200 ecoregions <u>which are also assessed by WWF as having a conservation status of endangered or critical</u>. Otherwise the word "or" would have been used. Therefore, does a region that has been evaluated by WWF as critically endangered no longer needs to be considered as potentially HCVF, unless it is also a Global 200 Region.</b></p> <p>The standard requires consideration of 'ecoregionally significant HCVs' and does not limit the recognition of ecoregions to Global 200 ecoregions. General references provided in the standard direct to WWF sources without limitation to Global 200 ecoregions (FSC-STD-4005, Annex 1, definition of ecoregion). Therefore, information about threatened ecoregions other than the examples provided in FSC-STD-40-005 V3-1 should be taken into account. The organization shall not ignore known and available sources of information in addition to the ones listed in normative documents.</p>	

<b>Code</b>	INT-STD-40-005_24 (also published under FSC-STD-30-010 V2-0 with code INT-STD-30-010_11)
<b>Requirement (s)</b>	FSC-STD-40-005 3-1
<b>Publication date</b>	16 January 2018

- 1 What criteria may be used to determine the parameters for definition of a 'forest', for protection of Old Growth Type 2 'forest' in Australian context? Is it appropriate to use a minimum area in order to distinguish between a 'forest' and a tree, or line of trees?**
- 2 Is the intention that the NFSS will be issued soon and override the need for this interpretation?**

1. No, in Australian context it is not appropriate to use a minimum area in order to distinguish between an Old Growth Type 2 'forest' and a tree, or line of trees. This is because the key element in Type 2 in the FSC Australia HCV assessment framework (applicable for implementation of the standard FSC-STD-40-005) is the use of 'stand', as stated on page 13:

“(B) Type 2 Old Growth: stands that have been logged, but which retain significant late-successional/old-growth structure and functions. “

The commonly used definition of a stand is: "a contiguous area that contains a number of trees that are relatively homogeneous or have a common set of characteristics."

Accordingly, a stand should be used as the definition of 'forest' for Old Growth Type 2.

Because of the requirement to maintain HCV values (controlled wood) and maintain and enhance (FM certificates) in Australian normative framework, both areas of Old Growth type 1 and 2 have to be maintained and or enhanced. In practice, this means that all stands that meet the Old Growth category are protected with allowance made for removing individual trees (normally just 1) under legal permit for reasons such as:

- The tree would represent a health and safety risk in the forest
- There are genuine silvicultural reasons to remove a single tree e.g. access.

2. It is the intention that the CW and FM standards be harmonized so that there is only one set of HCV definitions applying in Australia.

This interpretation will be revised upon the approval of the Australian NFSS, containing provisions for minimum area threshold for identifying what constitutes an HCV Area.

## DIRECTIVES

### **FSC-DIR-40-005 FSC DIRECTIVE ON FSC CONTROLLED WOOD**

<b>Code</b>	INT-DIR-40-005_02 (also published under FSC-STD-40-005 with code INT-STD-40-005_04 and under FSC-STD-20-011 with code INT-STD-20-011_07)
<b>Requirement (s)</b>	Applies to all requirements where the CPI is mentioned
<b>Publication date</b>	6 September 2013
<p><b>In 2012 the Corruption Perception Index (CPI) changed from a scale of 0-10 to a scale of 0-100. Shall the new 0-100 CPI scale be implemented in FSC normative documents that currently still reference the previous 0-10 scale system?</b></p> <p>Yes, CPI references in FSC normative documents using the 0-10 scale system shall be converted to the new scale.</p> <p>A reference to a CPI index threshold '5' based on the old scale system becomes a CPI index '50' applying the new scale.</p>	

<b>Code</b>	INT-DIR-40-005_04 (also published under FSC-STD-40-005 with code INT-STD-40-005_15)
<b>Requirement (s)</b>	ADVICE-40-005-01
<b>Publication date</b>	9 July 2014
<p><b>How should companies treat ecoregions that are not within the WWF Global 200 but are listed as 'critical/endangered' or 'threatened' by WWF? Should this information always be included in risk assessments, under 3.1?</b></p> <p>The standard requires consideration of 'ecoregionally significant HCVs' and does not limit the recognition of ecoregions to Global 200 ecoregions. General references provided in the standard direct to WWF sources without limitation to Global 200 ecoregions (FSC-STD-40-005, Annex 1, definition of ecoregion). Therefore, information about threatened ecoregions other than the examples provided in FSC-STD-40-005 and FSC-DIR-40-005 should be taken into account. The company shall not ignore known and available sources of information in addition to the ones listed in normative documents.</p>	



<b>Code</b>	INT-DIR-40-005_06 (also published under FSC-STD-40-005 with code INT-STD-40-005_10)
<b>Requirement (s)</b>	ADVICE-40-005-01
<b>Publication date</b>	9 July 2014

**Does the concept of ‘minimally disturbed by human economic activity’ in the definition of Intact Forest Landscape include fire suppression?**

Regarding definition of Intact Forest Landscape, firefighting or prevention for the protection of public safety is not considered an economic activity. Fire control in the context of forest management activities is not considered to be an economic activity of minimal disturbance.

<b>Code</b>	INT-DIR-40-005_11 (also published under FSC-STD-40-005 with code INT-STD-40-005_16)
<b>Requirement (s)</b>	ADVICE-40-005-04
<b>Publication date</b>	10 October 2014

**If a certified company sources material that has previously been FSC certified or covered by another company’s FSC Controlled Wood verification program but has since been traded by a non-certified company (therefore breaking the Chain of Custody), can this material be considered controlled with-out conducting a full verification program and risk assessment?**

For previously FSC-certified material from a broken Chain of Custody to be considered as FSC Controlled Wood, the company must trace the material back to the certified company that traded it to the non-certified company where the Chain of Custody was broken, and conduct an audit of the supply chain. This audit shall demonstrate with verifiable documentation that the material is identifiable and traceable and has not been mixed with uncontrolled material.

For previously controlled material from a broken Chain of Custody to be considered as FSC Controlled Wood, the district of origin must be determined within/through the company’s own Controlled Wood verification program, for which all relevant normative requirements apply. For this purpose, risk assessments performed by other entities (e.g. a supplier with a valid FSC certificate that includes FSC Controlled Wood in its scope that sold FSC Controlled Wood (without a claim) to a non-certified entity) may be used as additional sources of information.

<b>Code</b>	INT-DIR-40-005_12 (also published under FSC-STD-40-005 with code INT-STD-40-005_18)
<b>Requirement (s)</b>	ADVICE-40-005-07
<b>Publication date</b>	28 October 2014

**Shall the outcomes of a company verification program according to Annex 3 be made publicly available?**

No, currently there are no requirements for publishing the outcomes of verification according to Annex 3. The standard does not limit such an opportunity, however.

<b>Code</b>	INT-DIR-40-005_05 (also published under FSC-STD-40-005 with code INT-STD-40-005_09)
<b>Requirement (s)</b>	ADVICE 40-005-07, ADVICE 40-005-02
<b>Publication date</b>	9 July 2014

**With regards to Category 3 (HCV), what is the minimal level of detail for describing the sourcing in the district of origin in the published company risk assessment? If the district of origin includes potentially controversial sources, when the company describes their sourcing in this area, must the description of their sourcing explicitly state that they are not sourcing from controversial FMUs in that district?**

The minimum required information to be included in the publically available results of the risk assessment are provided in ADVICE 40-005-07 of FSC-DIR-40-005, which applies to all CW categories. In case of potentially controversial activities in FMUs located in a low risk district (See ADVICE 40-005-02 of FSC-DIR-40-005), a company should mention the existing FMUs with potential controversial activities in the publically available results of a risk assessment.

<b>Code</b>	INT-DIR-40-005_03 (also published under FSC-STD-40-005 with code INT-STD-40-005_05)
<b>Requirement (s)</b>	ADVICE-40-005-07
<b>Publication date</b>	5 February 2014

**Which process shall be implemented if a certified FMU is under suspension in a district that has been designated as low risk for all CW categories either by a National Risk Assessment or by a COC Certificate Holder in their FSC Controlled Wood verification pro-gram when the COC Certificate Holder wants to source from this FMU?**

At the moment of suspension, the products sold by the certified FMU\* are losing their FSC status. As the FMU is located in a designated low risk district for CW, the products may still be sourced as “controlled material” under the following conditions:

1. As some or all CW categories may be affected by activities that led to the suspension of the FMU, the COC Certificate Holder shall review and if necessary revise their risk assessment for the area of the suspended FMU.
2. The review/revision of the risk assessment shall be completed by the COC Certificate Holder within a period of two months from the date of suspension of the FMU certificate.
3. The COC Certificate Holder shall submit the reviewed/revise risk assessment to their CB for verification.
4. The reviewed/revise risk assessment shall be verified by the CB no later than one month after the COC Certificate Holder has submitted its reviewed/revise risk assessment, before it can be applied (see FSC-STD-40-005 V2-1 Clause 11.1).
5. As the whole district is considered low risk, the products sourced from the suspended FMU are considered controlled until the verification of the reviewed/revise risk assessment is completed by the relevant CB.
6. The outcome of the review/revision process including verification by the relevant CB will then determine the risk designation for the suspended FMU.
7. Material sourced from the area shall be classified as unspecified risk, if the timelines of review/revision and verification of the risk assessment (2, 4) is not met.

\* according to the standard FSC-STD-01-001 or FSC-STD-30-010

<b>Code</b>	INT-DIR-40-005_01
<b>Requirement (s)</b>	ADVICE-40-005-07
<b>Publication date</b>	16 July 2010
<p><b>In the previous FSC-ADV-40-016, section C.1 stated that risk assessments must be made available in one of FSC's official languages. However, ADVICE-40-005-07 in FSC-DIR-40-005 the requirement to use one of FSC's official languages is not included. Can you confirm that an official FSC language is not required anymore for risk assessment public summaries?</b></p> <p>Yes, based on the current directive, risk assessment public summaries do not need to be posted in the FSC database in an official FSC language (English or Spanish).</p>	

<b>Code</b>	INT-DIR-40-005_13
<b>Requirement (s)</b>	ADVICE-40-005-09
<b>Publication date</b>	2 March 2015
<p><b>ADVICE-40-005-09 indicates that “Companies will have a period of up to 12 months after the approval date to align their controlled wood verification programs to the approved risk designation by a National Initiative.” In many cases, this means a company risk assessment that designated low risk now needs to be aligned with a National Risk Assessment that designates unspecified risk. In these cases, does the certificate holder need to implement field verification according to Annex 3 of FSC-STD-40-005 V2-1 for areas of unspecified risk prior to the one-year transition date?</b></p> <p>Yes. When risk designations by an FSC Network Partner are approved, the certificate holder shall update its risk assessment to the outcomes of the NRA. Field verification according to Annex 3 of FSC-STD-40-005 V2-1 shall be implemented for areas of unspecified risk after the risk assessment is updated and shall be completed prior to the one-year transition date (12 months after the date of the approval of the NRA).</p>	

<b>Code</b>	INT-DIR-40-005_08 (also published under FSC-STD-40-005 with code INT-STD-40-005_12)
<b>Requirement (s)</b>	ADVICE-40-005-09, Clause 3 (Advice)
<b>Publication date</b>	9 July 2014
<p><b>Is a CoC-certified harvesting company that DOES NOT own or manage the forest required to conduct a nature value assessment when conducting a risk assessment according to Annex 2 of FSC-STD-40-005, when a nature value assessment is required by the respective National Forest Stewardship Standard?</b></p> <p>No, a company that is conducting a risk assessment according to Annex 2 of FSC-STD-40-005 (V2-1) is not required to perform a nature value assessment, unless it is required by an approved national guidance as per Annex 2, part A, Clause 2 of FSC-STD-40-005 and/or as per FSC-DIR-40-005-09, Clause 3 (Advice).</p>	

<b>Code</b>	INT-DIR-40-005_10 (also published under FSC-STD-40-005 with code INT-STD-40-005_14)
<b>Requirement (s)</b>	ADVICE-40-005-17
<b>Publication date</b>	9 July 2014

**Can timber of unknown origin collected from beaches be evaluated according to the standard FSC-STD-40-005?**


No, timber collected from beaches is not eligible for evaluation under the FSC Controlled Wood Standard FSC-STD-40-005 V2-1.

<b>Code</b>	INT-DIR-40-005_09 (also published under FSC-STD-40-005 with code INT-STD-40-005_13)
<b>Requirement (s)</b>	ADVICE-40-005-18
<b>Publication date</b>	9 July 2014

**Can a district of origin cover more than one country? If so, is a separate risk assessment required for each country, given the heterogeneity in assessing risk between two different sets of laws? What about within countries where the sub-national units (states, provinces, etc.) have the independence to create their own resource use and protection laws?**

According to its definition, a 'district' is considered to be a generic geographical definition within a country. Subject to the above, various guidance and requirements are provided stating that how a district shall be established depends on the CW category under assessment. In the case of National Risk Assessments (NRAs) it is possible to develop shared NRAs for countries sharing homogenous conditions (e.g. sharing the same ecoregions), according to the procedure FSC-PRO-60-002 V2-0 (FSC Controlled Wood Risk Assessments by FSC accredited National Initiatives, National and Regional offices).

Subject to the specific conditions of each CW category, the division of a country into sub-national units (e.g. states, provinces) will only impact how a district is defined if those divisions result in increased heterogeneity of the level or type of risk that is assessed within them.



<b>Code</b>	INT-DIR-40-005_07 (also published under FSC-STD-40-005 with code INT-STD-40-005_11)
<b>Requirement (s)</b>	ADVICE-40-005-19
<b>Publication date</b>	9 July 2014

**In cases where there is an approved national risk assessment, is it acceptable for the certificate holder to use the National Risk Assessment to satisfy the controlled wood requirements for conducting a risk assessment as specified in FSC-STD-40-005 and FSC-DIR-40-005, rather than having to generate its own risk assessment?**

The use of approved National Risk Assessments (NRAs) for sourcing Controlled Wood according to FSC-STD-40-005 is mandatory. Certificate holders have different options for aligning their verification programs with the results of applicable NRAs. Certificate holders may, for example, use NRAs available on FSC's website and/or the Global Forest Registry, or generate or update a new or existing company-developed risk assessment with the risk designation(s) provided in relevant NRAs. These examples are not exhaustive.



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