**FSC Comment Form for FSC-STD-40-004 Version 3-0 Draft 1-0 EN COC Certification**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Document type** | **Code** | **Version No.** | **Draft No.** | **Circulated** | **Policy Manager** | **Consultation** | **Deadline for comment** | **Compilation date** |
| Standard | FSC-STD-40-004 | 3-0 | 1-0 | 19 December, 2014 | Lucia Massaroth | Public | 28 February, 2015 |  |

|  |  |  |
| --- | --- | --- |
| **Comments provided by:** |  |  |
| Name: | Daniel Simonds |  |
| Organization: | MixedWood LLC |  |
| Phone: | +1 207-864-5025 |  |
| Email: | dan@mxwood.com |  |
| Date of comments submission: | 26 Feb 2015 |  |

**Comments shall be submitted to:** Dorothee Jung: [d.jung@fsc.org](mailto:d.jung@fsc.org)

| **Reference**  Part No. / Clause. No. / Note/Annex/Definition (e.g. “Introduction”; clause 3.1; p. 8, line 3) | **Type of  comment**  G = general; T = technical; E = editorial | **Comment**  Justification / rationale for change | **Proposed change**  Suggested new wording  (additions, modifications, deletions) | **PSU observation**  on each submitted comment | **Contributor**  M-econ, M-env; M-soc, CB, CH, NI / North-South |
| --- | --- | --- | --- | --- | --- |
| **various** | **T** | **The proposed draft includes a great deal of unnecessary and complicating detail – likely to make it less effective and credible in practice.** | **Please see various detailed annotations in the document referenced here: http://mxwood.com/wp-content/uploads/2014/12/FSC-STD-40-004\_V3-0\_EN-annotated-by-MW-22Dec2014.pdf** |  |  |
| **3.4** | **E** | **The proposed Transaction Verification (TV) requirements represent a major and ill-considered change in the fundamental organization of CoC. Please see here for additional rational and commentary:**  **http://mxwood.com/revisiting-myth-gap/** | **I recommend abandoning both TV and the OCP.**  **Alternative approaches to improving credibility and strength of the system include, a) simplification of the 40-004 (see below), and b) risk-based criteria in the 20-011.** |  |  |
| **various** | **T** | **It is entirely practical and very desirable to simply the format and detail of the 40-004. Advantages include reduced error rates, and improved auditability.** | **Please see this document for a proposed format: http://mxwood.com/chain-custody-simplified/** |  |  |