



PUBLIC CONSULTATION OF CONCEPTUAL PHASE OF CHAIN OF CUSTODY STANDARDS



Welcome to the public consultation of Chain of Custody Standards and the corresponding accreditation standard. These standards ensure that products which are sold with an FSC claim originate from well-managed forests, controlled sources, reclaimed materials, or a mixture of these. The consultation is open from 16 August 2024 until 15 October 2024.

Thank you in advance for your participation.

Supporting documents:

- FSC-STD-40-004
- FSC-STD-20-011
- FSC-PRO-20-001
- FSC-STD-40-003
- FSC-PRO-40-003
- FSC-PRO-40-003a
- FSC-STD-40-007

Questions

No	Questions	Reference
1. STRUCTURE OF THE NORMATIVE DOCUMENT		
1.1. Combining Standards		
1	To what extent do you agree with the proposal for combining standards. (1 - strongly disagree; 5 - strongly agree)	Section 1.1 Proposal: Combine CHs applicable standards and procedures into the one main CoC standard.
2	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
1.2. Modular approach		
3	To what extent do you agree with the proposal for digitization of the CoC requirements. (1 - strongly disagree; 5 - strongly agree)	Section 1.2 Proposal: Digitization of the CoC requirements.
4	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
2. FSC CLAIMS		
2.1. Claiming 100% reclaimed products as FSC Mix		
5	Please select your preferred option (single choice) a) Keep concept from ADVICE-40-004-17; b) Reinstate restriction from Clause 5.9; c) Other	2.1. Claiming 100% reclaimed products as FSC Mix 2.1.1 Downgrade FSC Recycled credit into FSC Recycled x%
6	Please provide the rationale for your answer and/or any suggestion for improvement. (open-ended)	

No	Questions	Reference
2.2. FSC CW + FSC Recycled inputs in the transfer system		
7	To what extent do you agree with applying the FSC CW output claim for a combination of FSC CW and FSC Recycled inputs. (1 - strongly disagree; 5 - strongly agree)	2.2. FSC CW + FSC Recycled inputs in the transfer system Proposal: Under the transfer system, combining FSC Recycled and FSC CW will result in an FSC CW output claim
8	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
2.3. FSC CFM with claim-contribution		
9	To what extent do you agree with the proposed claim-contribution for FSC CFM. (1 - strongly disagree; 5 - strongly agree)	2.3. FSC CFM with claim-contribution Proposal: FSC CFM claim to have a 70% claim-contribution in the CoC system.
10	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
2.4. Streamlining FSC Mix/Recycled Claims		
11	To what extent do you agree with the proposed change to FSC Mix/Recycled 100% to replace FSC Mix/Recycled Credit. (1 - strongly disagree; 5 - strongly agree)	2.4. Streamlining FSC Mix/Recycled Claims <i>Proposal:</i> FSC Mix/Recycled 100% instead of FSC Mix/Recycled Credit
12	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
3. TIMBER LEGALITY REQUIREMENTS		
13	To what extent do you agree with keeping specific legality requirements in a complementary standard. (1 - strongly disagree; 5 - strongly agree)	3. TIMBER LEGALITY REQUIREMENTS Proposal:

No	Questions	Reference
14	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	Specific legality requirements will be kept in a complementary standard.
4. LABOUR REQUIREMENTS 4.1. Expanding the universal requirements		
15	Do you have any specific concerns on any of the example changes on forced labour, child labour, and discrimination proposed? (Yes/No)	4.1. Expanding the universal requirements 4.1.1. Child Labour
16	Please detail these specific concerns (open-ended)	4.1.2. Forced and Compulsory Labour
17	Are there other elements of the current CLR that should also be revised? Please include, for example, terms and definitions to be amended. (open-ended)	4.1.3 Discrimination
4.2. Incorporation of Members' Motions in the FSC Core Labour Requirements		
18	Do you agree with the proposed suggestion to retain a general commitment to OHAS within Section 1, while keeping the main new requirements in Section 7? (Yes/No)	Proposals: Amendment of Clause 1.4 Addition to Section 7
19	If you answered 'No' to Q1, please provide your rationale. (open-ended)	Guidance on Application:
20	Please provide any immediate concerns you have on the inclusion of OHAS within Section 7 (FSC CLR)? (open-ended)	Incorporation of FSC-PRO-20-001 V1-1
4.3. Improvements for Policy Statements and Self-Assessments		
21	Do you consider the capture of quantitative information (e.g. worker number, gender, type) would present a major challenge for stakeholders? (Yes/No)	4.3. Improvements for Policy Statements and Self-Assessments 4.3.1 Providing more concise instructions

No	Questions	Reference
22	If you answered 'Yes' to Q1, please provide your rationale, or suggest an alternative document or method to capture this data. (open-ended)	4.3.2 Amendment of Self-Assessment Template
5. PRODUCT GROUPS AND CONTROL SYSTEMS		
5.1. Species information within the CoC system		
23	<p>Please select your preferred option. (single choice)</p> <ul style="list-style-type: none"> a) Species information in all cases; b) Species information only when required by legislation; c) Other 	<p>5.1. Species information within the CoC system</p> <p>Proposal:</p> <p>One of the following scenarios is proposed for incorporation in the revision:</p> <ul style="list-style-type: none"> • Scenario A: All certificate holders are required to provide their species information; or • Scenario B: Species information is only required when required by the legislation.
24	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
5.2. Cross-border credit/ percentage systems		
25	To what extent do you agree with expanding the scope of clauses 10.4 c) and 11.3 c) to Canada/the US region, or the EEA? (1 - Strongly disagree, 5 - Strongly agree)	5.2. Cross-border credit/ percentage systems
26	<p>Considering the proposal to expand the scope of clauses 10.4 c) and 11.3 c) to Canada and the US region or the EEA, to what extent do you agree with the following statements? (1 - Not at all, 5 – To a great extent)</p> <ul style="list-style-type: none"> a) The proposal contributes to promoting the emergence of certification for areas that are remote and currently lack FSC-certified materials. 	

No	Questions	Reference
	<ul style="list-style-type: none"> b) The cross-border model for credit/percentage control systems will enhance the visibility of FSC claims/trademarks in locations where FSC-certified materials are scarce or developing slowly. c) The cross-border model for credit/percentage control systems will facilitate sourcing more materials, even if the sourcing sites would be unable to process all of them into FSC job orders. d) A set of criteria must be established so other economic regions can join in the future. 	
27	Do you have any further comments about expanding the scope of Clauses 10.4 c) and 11.3 c) to North America (Canada and the US) region, or the EEA? (open-ended)	
28	<p>If you hold a CoC certificate in the Eurozone, please choose the answer that best reflects your current implementation of the requirements in Clauses 10.4 c) and 11.3 c) (select all that apply).</p> <ul style="list-style-type: none"> a) The current requirement is fully supported. b) Multi-site certificate holders are able to set up the control system and monitor the system across borders within the Eurozone. c) Multi-site certificate holders are unable to set up the control system across borders within the Eurozone. d) The question is not relevant to my scope of work. 	
<p>6. COMPOSITE MATERIALS</p> <p>6.1. Exploring how neutral materials should be accounted for in FSC products</p>		

No	Questions	Reference
29	<ul style="list-style-type: none"> • Please select your preferred option. (single choice) <ul style="list-style-type: none"> a) Keep ADVICE-40-004-15; b) Define threshold for ADVICE-40-004-15; c) Specify FSC content d) Other 	6.1. Exploring how neutral materials should be accounted for in FSC products Proposals: In the revision, FSC proposes the following scenarios for consideration:
30	Please provide the rationale for your answer and/or any suggestion for improvement. (open-ended)	<ul style="list-style-type: none"> • Scenario A: Keep the concept from ADVICE-40-004-15;or • Scenario B: ADVICE-40-004-15 is only mandatory where FSC content is below a defined threshold (e.g., <30%); or • Scenario C: Specify the FSC content/percentage within a product (on sales documents and additional text to the FSC label – while maintaining the original claim/label, e.g., FSC 100%);
7.2. Evaluating disassociated organizations operating as outsourcing contractors		
31	To what extent do you agree with the directional changes to outsourcing requirements. (1 - strongly disagree; 5 - strongly agree)	7.2. Evaluating disassociated organizations operating as outsourcing contractors
32	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
8. “SMALL-ENTERPRISES” – MOTION 28 8.1. Introducing a definition for “Small Enterprises”		
33	To what extent do you agree with introducing new provisions for “small enterprises”? (1-strongly disagree, 5 – strongly agree)	8.1. Introducing a definition for “Small Enterprises” Proposals:

No	Questions	Reference
34	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	On provision of an agreed definition of “small enterprise”, the following changes are proposed:
35	<p>In your opinion, what should be the criteria for “small enterprises”?</p> <p>a) Only a cap on number of full-time employees b) Only a cap on total annual turnover c) a cap on both number of employee and total annual turnover d) Other (please explain)</p>	<ul style="list-style-type: none"> • Identification: Organizations can be identified as “small” and are indicated as such on FSC database (voluntary). • Claim: Organizations that are classified as “small”, can include this information in their claim and pass it along the supply chain using the following statement “[name of organization] is certified as a small enterprise by FSC”
36	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	<ul style="list-style-type: none"> • Labelling: An organization that is classified as a “small enterprise” and uses the FSC trademarks, may utilize the designated "small enterprises" label. FSC-STD-50-001 V2-1 provides 2 labels (FSC 100% and FSC Mix) with regards to “community and small producers”. Including the new definition of “small enterprises” in chain of custody standards necessitates corresponding adjustments to “FSC 100%” and “FSC Mix” labels to reflect the changes of the new definition. Additionally, the label “FSC Recycled” for small enterprises needs to be added in FSC-STD-50-001. (see Figure 1 & 2) • The 2 million USD threshold to be linked to the annual adjustments of AAF (i.e., annual increase rate in AAF to be applied to the 2 million threshold). • Amended Definition of “community producer”: Definition in FSC-STD-40-004 to be adjusted to refer to “small enterprises” in chain of custody system. <p>Note: Organizations are not required to source exclusively from SLIMF management units to be considered a “small enterprise”.</p>
9. GROUP AND MULTI-SITE CERTIFICATION		

No	Questions	Reference
9.1. Group Certification Requirements		
37	<p>Which option do you consider more suitable for the revision of CoC group certification?</p> <ul style="list-style-type: none"> a) Scenario A b) Scenario B c) Other 	<p>9.1. Group Certification Requirements</p> <p>Proposals:</p> <p>Scenario A: Removing the thresholds and leaving it to organizations to decide to join groups or have a single CoC certification.</p> <p>Scenario B: Using the established classifications of AAF in FSC-POL-20-005. In this option, organizations falling under Class 2, would be eligible for group certification.</p>
38	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
39	In your view, should the cap on the number of participating sites be set at 500, or would a higher or lower threshold be more appropriate?	
10. RECLAIMED MATERIAL AND CIRCULARITY		
10.1. Material Inspection and Supplier Audit Program		
40	On a scale of 1 to 5, how effective do you consider the proposed changes will be in streamlining the material inspection and audit process? (1 - Not at all effective, 5 - Very effective)	10.1. Material Inspection and Supplier Audit Program
41	What specific challenges or opportunities do you foresee in implementing these proposed changes? (Please specify) (open-ended)	
10.2. Inclusion of New Circularity Concepts		

No	Questions	Reference
42	To what extent do you agree that FSC should incorporate take-back models into its circularity concepts? (1 - Strongly disagree, 5 - Strongly agree)	10.2. Inclusion of New Circularity Concepts 10.2.1. Leasing and Take-back Solutions
43	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
44	To what extent do you agree that FSC should incorporate leasing models into its circularity concepts? (1 - Strongly disagree, 5 - Strongly agree)	
45	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
10.2.2. Circularity Concept for Further Consideration		
46	To what extent do you agree that a “reuse claim” would benefit FSC's stakeholders? (1 - Strongly disagree, 5 - Strongly agree)	10.2.2. Circularity Concept for Further Consideration <ul style="list-style-type: none"> • Repair and Reuse • Co-Products • Salvaged Wood • Urban Waste Wood <ul style="list-style-type: none"> ○ Proposal: FSC proposes to consider trees harvested in urban areas to be equivalent as ‘post-consumer reclaimed material’, with a system to mitigate potential risks identified. • Pre-consumer Reclaimed Wood
47	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
48	To what extent do you agree that salvaged wood should be included as reclaimed material in the FSC standard? (1- strongly disagree – 5 strongly agree)	
49	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	

No	Questions	Reference
50	Do you foresee any risks for considering salvaged as reclaimed material? (Open-ended)	
51	What measures should FSC implement to ensure the traceability and integrity of salvaged wood in the certification process? (Open-ended)	
52	To what extent do you agree that FSC should include urban wood trees as post-consumer reclaimed material? (1- strongly disagree – 5 strongly agree)	
53	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
54	Do you foresee any regulatory and integrity risks associated with allowing urban waste trees as 'post-consumer reclaimed material'. (Open-ended)	
<p>11. FSC INITIATIVES</p> <p>11.1. CoC Procurement claims</p>		
55	To what extent do you agree that verified procurement claims will help increase the market for FSC-certified output? (1 - Not at all, 5 – To a great extent)	11.1. CoC Procurement claims
56	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
<p>11.2. FSC IT Initiatives</p>		

No	Questions	Reference
57	To what extent do you agree with the proposed FSC IT initiatives for CoC. (1 - strongly disagree; 5 - strongly agree)	11.2. FSC IT Initiatives
58	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
59	Please select the IT initiatives that should be prioritized from a CoC perspective. <ul style="list-style-type: none"> a) FSC Trace requirements; b) FSC database changes (e.g., improved visibility); c) CoC Digital Audit Report; d) Modular approach; e) Other (multiple choice) 	
60	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
61	Regarding the 'automatic conformity' (exemption from applicability) of certain requirements through use of FSC Trace, please share any concerns and/or additional suggestions with the concept and examples provided. (open-ended)	
13. FSC-STD-20-011: Accreditation requirements 13.2. Risk-based approach evaluations		
62	To what extent do you agree with a general risk-based approach to include remote and hybrid evaluations. (1 - strongly disagree; 5 - strongly agree)	13.2. Risk-based approach evaluations 13.2.1 Remote and hybrid evaluations

No	Questions	Reference
63	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	13.2.2 Waiving surveillance audits
64	To what extent do you agree with the proposal for waiving surveillance audits (waiving a maximum of one per cycle). (1 - strongly disagree; 5 - strongly agree)	
65	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
13.3. Evaluation of group and multisite chain of custody certificates		
66	To what extent do you agree with the proposed new sampling methodology? (1 - strongly disagree; 5 - strongly agree)	13.3.1 Changes to the sampling methodology of the participating sites <i>Proposal:</i> Based on the integrity concern described in the background, the revision of the sampling methodology is proposed, with the modification to increase the audit sample size based on a risk-based approach. This entails: <ul style="list-style-type: none"> • Revision of the risk factor for all CHs To address identified integrity risks (including a score for high-risk countries in relation to CLR, organization with high-risk supply chains e.g., charcoal, in their scope or high-risk species with reference to ADVICE-40-004-20 V2-0); • Percentage requirement for high-risk Requiring 20% of high-risk participating sites/members to be included in the sample size for each evaluation or the use of the sampling formula, whichever is higher. This ensures that all high-risk members/sites have been evaluated at least once
67	Please provide the rationale for your answer and/or any suggestions for improvement. (open-ended)	
68	What other factors could be included to calculate the sample size of group members or multi-sites? (open-ended)	

No	Questions	Reference
		during a certificate cycle. As for the low-risk sites/members, CB can decide to use the formula or percentage threshold.
13.4. Evaluation of FSC Core Labour Requirements		
69	Would you consider it beneficial to add evidence requirements for each core labour requirement within the evaluation standard? (Yes/No)	13.4.1 Improved clarity on requirements for contractors 13.4.2 System for evaluating CLR
70	How could the current Section 11 of FSC-STD-20-011 be improved? Please provide detail. (Open-ended)	
14. FSC-PRO-20-001 V1-1: Procedure on Commitment to FSC Values and OHAS		
14.1. Incorporation into other normative documents		
71	Do you foresee any issues with the proposed recommendation to incorporate this procedure (FSC-PRO-20-001 V1-1) into FSC-STD-20-011? (Yes/No)	14.1. Incorporation into other normative documents
72	If you foresee any issues with proposed approach, please detail your concerns. (Open-ended)	