Forest Stewardship Council®



FSC-STD-40-005 V3-1
Requirements for sourcing FSC Controlled Wood

Frequently Asked Questions (FAQ)

FORESTS FOR ALL FOREVER™

Report

1. **Can an organization apply DDS to forest that it owns or manages, to source controlled wood from them?**
   Clause 1.4 of FSC-STD-40-005 V3-1 states, “The organization shall not apply its DDS to forest resources that it or any affiliated organization owns or manages, unless an FSC risk assessment for all five controlled wood categories has been scheduled for an area covering the supply units by 31 December 2017."

   Since the FSC risk assessments schedule is now completed, this clause can be understood as “Organizations can apply its DDS to forest resources that it or any affiliated organization owns or manages only in the countries where FSC has an approved risk assessment.”

   The only exceptions to the above statement would be New Zealand, Honduras and Mexico, which had risk assessments scheduled prior to December 2017 and are due for delivery in 2019.

2. **When outsourcing DDS to external parties, such as consultants, does the organization need to have outsourcing agreement as specified by FSC-STD-40-004 V-3 Clause 12?**
   Outsourcing DDS to external parties is an independent service transaction between the organization and the external party/consultant beyond the scope of the FSC requirements. Therefore, it is beyond the scope of the FSC-STD-40-004 V3-0, and as such, does not require an outsourcing agreement as per Clause 12.

3. **Will the DDS need to be revised if the suppliers change the management and inexplicitly change the company, maintaining the location?**
   Yes, if the management change implies a new assessment of risk or risk mitigation. Clause 1.6 specifies that, “The organization shall review and, if necessary, revise its DDS at least annually, and whenever changes occur that affect the relevance, effectiveness, or adequacy of the DDS”. This review can result in an immediate revision or as part of the annual internal audit, depending on the effect this management change might have on the effectiveness of the DDS.

4. **Do transporters need to be included in the list of suppliers under the requirements of DDS (given that harvesters and transporters usually change during the seasons)?**
   The standard requires that all suppliers and sub-suppliers shall be included in the DDS. This is to trace material back to its origin, including transport. However, individual transporters, who are not suppliers, do not usually have to be included, and information confirming transport will suffice.

5. **We have to make a new analysis when using wood from a new area. Do we have to contact our certification body to validate the new analysis?**
   It depends on the new area from which the organization is starting the sourcing from. Clause 1.6 of FSC-STD-40-005 V3-1 requires the organization to review and revise its DDS whenever changes occur that affect the relevance, effectiveness or adequacy of the DDS. Similarly, Clause 6.2 of FSC-STD-20-011 V4-0 requires the certification body to design and implement a system for evaluating the relevance, effectiveness and adequacy of the DDS, according to the scope and scale of the organizations’ operations.

   If the new sourcing area is from a different supply unit within the original supply area, the organization needs to update its DDS and keep its certification body informed. There is no requirement for the certification body to validate the information immediately, which can be done at the next surveillance audit. However, if the sourcing is from a new supply area, the certification body needs to evaluate the DDS to see whether the DDS has been updated to reflect the new supply area, verify the new risk designations and if risk is present, whether adequate control measures to mitigate the risks have been implemented.

6. **Can a certification body develop control measures for an organization if an FSC risk assessment is present but there are no mandatory control measures included in it, or these control measures are insufficient to effectively mitigate risk?**
   The organization implementing the standard can outsource the development of all or part of its due diligence system (including the development of control measures), to another organization, such as a certification body, but not the certification body that audits the organization’s conformity to the requirements of the standard.

7. **Does an organization need to conduct field verification for DDS every year?**
   Not necessarily. The standard requires organizations to undertake a review and, if required, revision of its DDS, at least annually, and whenever changes occur that affect the relevance, effectiveness or adequacy of the DDS. This review could include stakeholder consultations, field verifications and document review, all of which may be included as part of the internal audit of DDS. So, depending on the requirements of the review, the field verification may or may not be required annually.

8. **Does an organization always need to trace the materials to the supply unit to prove the origin of the materials? To what extent does the organization need to trace the materials in the supply chain to meet the requirements of the "origin of the material"?**
   No, the organization does not need to always trace the material to the supply unit level to prove origin of material. The standard requires the organization to trace the material to the extent that it is possible to identify the area with a homogenous risk designation for each Controlled Wood category in the applicable risk assessment.
   However, please note that where 'specified' or 'unspecified' risk is designated, there may be control measures that need to be implemented in the supply unit(s) of origin. In such cases, information on the supply unit of origin will be needed.

9. **The standard allows supplier declarations as proof of origin for co-products (if their content is plausible). On the other hand, the standard says that ALL suppliers and sub-suppliers need to be included in the DDS. Therefore, many auditors expect also the knowledge about the sub-suppliers in case of co-products. Are they right?**
   No, this is a misinterpretation of the standard requirements. Clause 2.5 of FSC-STD-40-005 V3-1 clearly states that for co-product inputs, the organization needs to either document the origin as per Clause 2.2 or have in place a legally effective and enforceable agreement with the supplier of the co-product, which includes a statement on the origin.

   The standard however, does require the certificate holder to document and maintain the names and addresses of its suppliers (but not its sub-suppliers).

10. **How can you PROVE an origin on the level of a region? Which documents with which content can serve for that?**
    FSC-STD-40-005 V3-1, Clause 2, Box 2 provides details of documenting origin. It states,
    "Relevant documentation may include, but is not limited to, legally required transport documents and proof of purchase from the supply unit of origin (see below), and the relevant invoicing system used in the area(s) of origin. Evidence of origin may be verified by the organization at the supplier's site, and/or off site, using copies of relevant documentation. Information on the supply unit of origin is not always required for evidence of origin but will be needed if a control measure (e.g. field verification) is relevant on that scale."

11. **Can supplier's declaration alone be considered sufficient proof of origin?**
    No, supplier declaration alone will not be considered proof of origin. Only in the case of sourcing co-products, legal binding agreement can be used as a statement for origin conditional to be meeting the requirements of Clause 2.5.

12. **If a company uses FSC Controlled Wood purchased from other organizations, do they need to implement the FSC-STD-40-005 standard?**
    No. Organizations that purchase materials that already has the FSC Controlled Wood claim do not have to implement the standard FSC-STD-40-005 V3-1. The transaction/trading/purchase/sale of the material with an FSC claim is covered by FSC chain of custody certification (FSC-STD-40-004 V3-0) instead. Organizations need to use FSC-STD-40-005 V3-1 only for sourcing material without an FSC claim that they would like to use as controlled wood.

13. **Where I can find the most updated approved National Risk Assessment (NRA)?**
    Organization can find the most updated draft and approved risk assessments on the FSC Document Centre, at https://fsc.org/en/document-center.
14. **When will organizations no longer be able to use old NRAs?**

NRAs approved according to FSC-PRO-60-002 V2-0 ('old NRAs') were valid only until 30 June 2019.

15. **If a country covered by FSC risk assessment is not approved by 30 June 2019, what kind of risk assessment shall the companies use?**
    For all countries and regions where an FSC risk assessment was scheduled by 30 December 2017, organizations sourcing material from these areas could continue to use company risk assessments in their DDS, but not beyond 30 June 2019 (unless as per Clause 3.2 of FSC-STD-40-005 V3-1). If an FSC risk assessment according to FSC-PRO-60-002 V3-0 is not approved for these countries and regions by 30 June 2019, these areas shall subsequently become 'unassessed areas'. Organizations continuing sourcing material from these areas after this date are required to have extended company risk assessments (ECRA) in place for their DDS.

16. **If a product contains material from several countries, which country should the risk assessment should be based on?**
    If material originates from different countries, the DDS should contain risk assessments for all relevant countries.

17. **Clause 3.2 of the standard says that organizations must use the approved FSC risk assessment within six months of its approval. Does this mean the organizations need to review/update its risk assessment every 6 months? and the organization need to be audited by their certification body within that six months period to demonstrate that they have indeed started using the approved FSC risk assessment?**
    No, FSC Risk assessments, as and when they are approved, are published on the FSC Document Centre. Organizations sourcing from those countries have six months to adapt their DDS to the newly approved risk assessment. This does not mean that they need to be reviewed/updated every 6 months. Also, there is no requirement for the certification body to audit the organization at the end of the 6-month period.

    The DDS needs to be reviewed/updated at least annually, or when changes occur that might affect the relevance, effectiveness or adequacy of the DDS.

18. **If part of the FSC risk assessments are approved (not all categories), can an organization start using it or should the organization wait till all categories of the FSC risk assessment has been approved before using it?**
    If only a part of the FSC risk assessment is approved i.e., not all 5 categories, organizations will still need to develop Extended Company Risk Assessments (ECRAs). However, they are recommended to use the draft FSC risk assessment (approved categories) as a starting point while developing their ECRAs.

19. **Does an organization need to do any mitigation if an NRA claims specified risk but stakeholder consultation in the supply basin indicates confirmation of low risk?**
    If the NRA has concluded 'specified' risk for a supply area, then the organization must implement mitigation measures before using the material as 'controlled material' in their supply chain. However, in case no mandatory control measures are specified in the NRA, then the next control measure that would be most suited in this situation is for the organization to prove that although that specific indicator is 'specified risk' at a supply area level, at the level of its own supply chain, the risk does not exist (or that the risk stands mitigated). It could use a variety of measures here to prove that, including, but not limited to, stakeholder consultations, experts' consultations, document review, field verification, etc.

    The important point here is for the organization to prove to its certification body that the risk does not exist in its supply chain.

20. **If an NRA states low risk for all HCV categories, are risk mitigation processes relevant?**
    There are two types of risk, risk of origin (which the NRA deals with) and risk of mixing. If risk of origin is low, no mitigation action is needed for the is type of risk. However, the organization would still need to verify if there could be a risk of mixing, and in case there is, then it needs to put in place risk mitigation measures for that.

21. **Can an organization do sampling in providing the information of suppliers and sub-suppliers in their supply chain of material being sourced?**
    The standard does not require specific sampling methods, nor does it rule them out. It is the organization's responsibility to ensure any sampling done is adequate, and it is the CB and ASI's mandate to evaluate whether the sampling of supply chain confirms low risk or risk mitigation. Please note that sampling at the supply unit level is different than sampling in the supply chain and may require different measures.

22. **If the organization makes a DDS including a supplier in a risk area and is asking for sub-supplier info/invoices and the supplier is not willing to inform the organization, should you stop buying from the supplier? It is normal that some information is not for sharing?**
    One of the requirements of the DDS is that "The organization shall ensure that the organization, the certification body, and Accreditation Services International are granted access to evidence of conformity with applicable requirements of this standard, including access to documents, sites, premises of suppliers and sub-suppliers, and supply units, where relevant."

    So, it is important that the organization has enough information from the supplier and sub-supplier to implement the DDS. How it obtains this information from its supplier, and how confidentiality of that information is maintained is a matter of business relations between the organization and its supplier/sub-supplier.

    However, if the supplier refuses to share relevant information, which might prevent the standard requirements to be implemented, then perhaps the organization would need to consider excluding this supplier from their list of controlled material suppliers.

23. **In conducting DDS, do the organization need to provide a full list which has the names and addresses of all the sub-suppliers?**
    According to Clause 2.1, the organization shall obtain, document and maintain the up-to-date information on the names and addresses of direct **suppliers**. However, in Clause 2.3 which also states the organization shall have access to the information on its supply chains (including sub-suppliers) to a level that allows it to confirm and document: a) The origin of the material; b) The risk related to the origin, and the risk related to mixing with non-eligible inputs in the supply chain and c) The mitigation of risk.

24. **DDS is provided to the CB only in a form of link to the consultant's web-page. Would the existing mode of provision by the contractor to the two companies' CW RAs to the CB (via a link to a difficult to review webpage) be enough to address clauses 5.4 and Annex A, 1.4 of FSC-STD-40-005**
    There are no specific requirements in the standard about the way the risk assessments and DDS need to be presented. However, there is a requirement that the DDS needs to be accessible to the CB. If the CB cannot access the DDS, then it cannot do the evaluation.

25. **DDS public summary and the full version of risk assessment are not uploaded to info.fsc.org. Instead, a link to external web-page is found in the audit report/risk assessment uploaded to the FSC Database. Does this adequately address clause 5.8 of FSC-STD-20-011?**
    The FSC requirements regarding public summary are limited to the fact that the public summary should be available on the FSC database, as long as the public summary is available on the database and accessible, the requirements are met. If, however, the link is not working, or access to the summary and risk assessment through the link is not possible, then it would be a problem.

26. **Is the company required to submit an updated "written summary of its DDS" to the certification body once they have updated their DDS?**
    Yes, the organization is required to submit an updated "written summary of its DDS" to the certification body once they have updated the DDS. The review and update of DDS can be conduct annually.

27. **When the risk designation of a supply area changes, does the CB have to audit the DDS within a certain time period, given that the client informed the CAB about updated DDS?**

No, there is no requirement that the CB has to audit the CH within a specific time period after updation of the DDS. In the case when an organization needs to align their DDS to the newly approved FSC Risk assessment where the risk has changed from 'low' to 'specified', the organization is responsible for designing adequate control measures and implementing them before material is used. An evaluation of the control measures, including their implementation and adequacy would be done by the CB at the next surveillance audit.

However, Clause 6.2 of FSC-STD-20-011 V4-0 requires CBs to design and implement a system for evaluating the relevance, effectiveness and adequacy of the DDS according to the scope and scale of the organization's operation. In the design of this system, the CB can choose to specify when it will undertake an evaluation of the DDS, in case the DDS is updated. This frequency can be different from that of the annual surveillance assessment also.

28. **The organization is intending to source from a certain supply area, where risk designation has changed from 'low' to 'specified' due to approval of an FSC risk assessment. However, the organization is presently not sourcing from that region, but has included it in its risk assessment as a possible future source.**
Does the CB have to audit the DDS within a certain time period, given the client informed the CAB about updated DDS?
FSC-STD-40-005 V3-1 Clause 3.2 requires the organization to adapt its DDS to use FSC risk assessments within 6 months of their approval by FSC, unless an extension is justified and approved by the certification body.

When the risk designation of the supply area has changed, the CB would need to be informed prior to start of procurement from the area, and the CB would need to undertake a review of the control measures that need to be implemented due to the revised risk designation. However, there is no requirement for the certification body to audit the certificate holder within a certain time period. In case there is no sourcing occurring, the CB can review the requirements at the next surveillance assessment.

29. **Does the CB have to publish the updated DDS of the client and/or the updated "public certification summary" within a certain time period? Or is this sufficient to do this at the next surveillance audit?**
FSC-STD-20-011 V4-0 does not require the CB to publish the DDS of a CH. It only requires the CB to publish the public certification summary, which contains elements of the DDS. When the certification body approves a new or updated risk assessment conducted by the organization, the certification summary shall be updated with the risk assessment within seven business days of approval.

30. **Does a publicly available summary of DDS need to include risk assessment with regards to risks of mixing?**
Yes, the public summary of the DDS needs to include the risk of mixing.

31. **What is meant by "where relevant" at the end of Requirement FSC-STD-40-005 1.3: The organization shall ensure that the organization, the certification body, and Assurance Services International are granted access to evidence of conformity with applicable requirements of this standard, including access to documents, sites, premises of suppliers and sub-suppliers, and supply units, where relevant.**
'Where relevant' refers to where there is a need for information to assess conformance to requirements. E.g., Inclusion of suppliers and sub-suppliers is not equivalent to listing all sub-suppliers in the supply chain(s). Names and addresses of suppliers are required in Clause 2.1. The level of additional information required from the supply chain(s) (and sub-suppliers) will depend on the identified risk and control measures.

32. **"The organization shall provide a written summary of its DDS to the certification body".**
Under "Note 2" it is stated "The summary of the DDS is not required to be in one of the official languages of FSC (English and Spanish)."
Is it however required that the summary of the company's DDS is translated in all languages where the CB must conduct stakeholder analysis?

There is no requirement in FSC-STD-40-005 V3-1 for the organization to produce the summary of its DDS in any specific language, and that there are no explicit language requirements for CB stakeholder consultations in FSC-STD-20-011 V4-0. (For comparison, requirements for CB stakeholder consultations in forest management evaluations make it clear that stakeholders must be contacted and have the opportunity to respond in an appropriate local language [FSC-STD-20-006 V3-0 clause 2.2 note], but do not include an explicit requirement to translate any information provided by the organization.)

Clause 6.1 d) in FSC-STD-20-011 requires that the CB shall "employ effective and culturally appropriate means of invitation, notification, and consultation". Therefore, although there is no normative requirement for CBs to translate the summary of the DDS, it may be necessary to meet the above requirement."

33. **Shall a company conduct a new stakeholder consultation when the supply area with high risk for Category 3 is extended additionally to 5-10% of its area? Shall a company involve stakeholders, which are relevant for the entire supply area, or just those, who are relevant for the part being added?**
The consultation shall be adequate to the scale and size of the organization's operations (in this case, with reference to the new area proposed to be added) and needs to include both affected and interested stakeholders.

34. **What does "risk of mixing in the supply chain" mean?**
Risk of mixing in supply chain" refers to risk of mixing material which has been harvested in an area of particular risk determination (assessed for a particular geographical area according to the applicable risk assessment requirements) with non-eligible inputs in its supply chains during transport, processing, and storage. This includes the risk that material is mixed with non-eligible inputs or material with a different origin, which would not allow the risk related to origin to be confirmed. This risk is specific to the organization and additional to risk of material originating from unacceptable sources.

In order to efficiently mitigate risk, both perspectives must be considered, and risk mitigation measures must be applied at the proper 'level' of the supply chain. In practical terms, and from the organization's perspective, a risk assessment is a thorough look at its supply chain to identify situations, processes, etc., that may result in unacceptable or non-eligible sources entering the supply chains.

35. **Many auditors say: You have to assess the risk of mixing in the supply chain, therefore you have to trace the material back, because you need to know the supply chain, otherwise you cannot assess the risk! Is that right?**
Not necessarily. If the material origin is determined to be from an area of homogenous risk designation, then further determination of risk of mixing is not required. As stated in the previous answer, the risk of mixing comes into play when there is a risk of mixing material which has been harvested in an area of particular risk determination with non-eligible inputs in its supply chains during transport, processing, and storage. If all material in a supply chain, for example, is originating from an area of homogenous risk designation, then there does not remain a need for tracing the material back to source.

36. **a) When sourcing tertiary mill residuals such as sawdust from a flooring manufacturer, it is often difficult to trace the materials back to the forest level. We can ask the manufacturer for a list of where they buy lumber, but this can involve a huge RA area that is sometimes unmanageable. Any suggestions how to handle?**
b) How do you verify residual chips from a sawmill? by-products from process?
c) How do you verify sources from remanufactured suppliers? Lumber remanufacturing that takes low quality lumber from many sources and reprocesses into smaller specialty products. The chips from those sources are by-products from remanufacturing.
By-products from lumber remanufacturing, residual chips and saw dust are all considered as co-products as per the FSC-STD-40-005 V3-1. The provisions related to co-products are provided in Clauses 2.4 and 2.5. For documenting origin of co-product inputs, the standard provides 2 options:

Option A - a) Identify the area with a homogeneous risk designation for each controlled wood category in the applicable risk assessment; or b) Confirm that material was harvested from FSC certified sources, or previously controlled sources (where material was previously sold with the FSC Controlled Wood claim) but supplied to the organization without an FSC claim.

Option B – the organization shall document the origin with a legally effective and enforceable agreement with the supplier of the coproducts that includes a statement on the origin that includes a) Information about the origin of the co-products that allows the area with a homogeneous risk designation in the applicable risk assessment to be identified for all five controlled wood categories (e.g. province and/or forest type/ownership); b) A commitment that, in cases where material originates from specified risk areas, the supplier will support the organization to collect the information needed to implement control measures.

These are presently the only two possible options that the standard provides for verifying origin. The greater challenge for complex supply chains will, in most cases, be mitigating the risks across diverse supply units.

37. **What do you do with salvage wood? Wood that has been recovered from waste or removed from waterways due to marine hazards. How can NRAs/CNRAs be applied to sourcing salvaged wood, including from non-forest land, when the risk assessments were conducted for forest lands?**
FSC-STD-40-005 V3-1 defines Material as," Material originating from a forest (e.g. wood and wood products, and non-timber forest products), or salvaged wood, without an FSC claim, that is being evaluated by the organization to determine whether it originates from acceptable sources."
As per the above definition, salvage wood can be considered for evaluation as controlled material. Further, risk assessments are not restricted to forest lands, rather, they are for a supply area - The geographical area from which material is sourced. The supply area does not need to be defined as a single contiguous area; it may comprise multiple separate areas that span multiple political jurisdictions including countries or multiple forest types. Typically supply areas comprise of a whole country.

For salvage wood, the organization needs to implement the DDS, i.e., identify origin to a homogenous risk designation, determine risk and if risk is present, implement control measures. However, on a practical level, the nature of salvage wood itself, i.e., recovered from waste or removed from waterways due to marine hazards etc. might act as mitigating factor for risk. The controlled wood standard is designed to prevent wood from the five categories that FSC considers unacceptable from entering the supply chains. The organization would need to evaluate the salvage wood to determine the risk related to the origin of the material for each controlled wood category.

38. **Would you ever consider other Certification schemes (i.e. PEFC) material as low risk into the FSC CW standard? If not, why?**
In principle, FSC does not consider material certified under other schemes as default 'low risk'. However, evidence used to prove conformity to other certification schemes may be used in the DDS to prove origin and/or low risk. In such a scenario also, the assessment will be based on the evidence as such, rather than on the certification status of the material.

39. **Why do NRAs supersede CNRAs? In case a country has a weak environmental chamber it can be possible to conduct a weak NRA in consensus. In such a case CNRA would most certainly provide more objective and demanding risk assessment which would be better aligned with other countries' risk assessment. Do you see a problem here?**
NRAs are developed by country level working groups, who have participation of economic, social and environmental chamber representatives. As such, they are considered to be more representative and reflect the ground situation in the country more accurately, whereas CNRAs are developed by consultants engaged by FSC. The consultants may or may not have the depth of knowledge or access to information that members of the working group are expected to have. In either case, the developed documents (CNRA as well as NRA) undergo multiple rounds of review by FSC reviewers, who check for accuracy and compliance to the approved risk assessment development procedures as well as calibrate the risk designations with neighbouring/similar countries to ensure better alignment. Further, both CNRA and NRA are subject to public

stakeholder consultations. As such, all other factors being equal, it is expected and experienced that NRA development processes tend to better reflect the level of risks on the ground than CNRA, and that is the reason the NRAs supersede CNRAs.

40. **What kind of control measures are acceptable if I purchase from a trader? Traders would not like to provide information about their suppliers.**
The standard does not provide much flexibility in this regard. Even if the purchase is from a trader, you would need to have access to information to a level that allows you to confirm and document:
a) The origin of the material;
b) The risk related to the origin, and the risk related to mixing with non-eligible inputs in the supply chain;
c) The mitigation of risk

Depending on the level of risk, if the control measures need to be implemented at the supply unit level to mitigate the risk, then you will need to collect information up to that level. If, however, mitigation is possible through measures that don't involve going to the field level i.e., through document verification, stakeholder consultations etc., then you don't need to collect information about sub-suppliers of your supplier.

Another solution is to request the trade to apply controlled wood certification, without providing information about the sub-suppliers but providing with FSC Controlled Wood claim directly.

41. **a) We have implemented supplier audits on MU level as CM for an unspecified risk area (Country). We did a sample approach: sample of our direct suppliers (using "old" approach 0,8 square root n) and sample of their supplier = MU using a lower sample size (min. 3 until max. 0,5 square root n depending on own defined risk) - can you give any advice, examples, etc. if this might work or not or how to define that?**
b) Does the company have to verify ALL suppliers annually or can it be sampled?
c) As it relates to a DDS - What is an acceptable sampling of an organizations CW suppliers annually?
d) If an organization does onsite field verification visits with GPS locations of 10% of its CW suppliers, is that an acceptable CM within its DDS?
Sampling frequency and intensity of sampling depends upon the risk. The standard does not specify anything in this regard and leaves it to the judgement of CBs and certificate holder to see what the sampling intensity is required for risk mitigation. The only requirements that the standard specifies is that the control measure needs to be adequate to mitigate the risk – this might require a more or less intensive sampling, and in many cases sampling might be avoidable all together!

42. **Does documented education of an organizations CW suppliers about unacceptable materials sources serve as a CM within its DDS?**
That would depend upon the risk, and whether such an action is adequate to mitigate the risk. However, on a practical level, a documented training would be difficult to prove as an adequate stand-alone control measure, and it might work better as a part of a combination of measures. However, it is difficult to say with confidence at this stage, as it would depend on the risk itself.

43. **The CNRA in Latvia suggests mitigating an HCV risk via field control of every logging site, and this is what we are currently doing. However, is it possible to replace this by sampling?**
Mitigation measures provided in a CNRA are not mandatory and are only recommended in nature. Organizations are at liberty to select the control measures which are most suited to mitigate the risk. Depending on the risk, a sampling of field visits might also be adequate to mitigate the risk.

44. **Section 4 of the standard differentiates between "Control measures established by the organization" and "Control measures provided in an NRA ". Does the latter also include recommended CMs provided in a CNRA? Additionally, the requirements for control measures provided in an NRA only refer to mandatory CMs in the NRA. Do they also refer to recommended ones?**
As per Clause 4.12 of the FSC-STD-40-005 V3-1, the organization shall implement control measures designated as 'mandatory' in the NRA. For control measures provided in a CNRA, or for 'recommended' control measures in the NRA, the organization is at liberty to adopt the control

measure, adapt it to suit its requirements, or ignore those control measures and develop new ones. The requirements of Clause 4 of the standard specify only that control measures need to be adequate to mitigate the risks. What constitutes adequate control measures is for the organization to decide, based on the extent of risk and the nature of its sourcing and supply chain.

The mandatory and recommended control measures in a CNRA/NRA have been developed by experts and have gone through consultation and they do not require further consultations. However, it needs to be kept in mind that just because the control measures exist in the CNRA/NRA document does not automatically make them adequate to mitigate the risks. The risk mitigation still needs to be verified.

45. Could a mandatory Control Measure included in an NRA be the creation of local committees to elaborate more control measures in the future (probably not included in the NRA)?

The control measures that are provided in the NRA are designed for organizations to mitigate the risks identified. i.e., they are targeted at organizations who are implementing the standard, and who need to mitigate the risks prior to using the material as controlled material. If the specific control measure is essential and unavoidable to mitigate the risk, it may be included as mandatory. However, control measures need to be SMART i.e., specific, measurable, achievable, relevant and tangible. Without going into the specifics, it is difficult to gauge how creation of local committees would lead to mitigation of identified specified risks, especially when it is not clear what the organization needs to do. However, a modification of that control measure e.g., requiring participation of the organization in committees established to devise locally relevant control measures might be considered as a control measure.

46. Companies have an option to develop alternative control measures to the mandated control measures of the NRA. What type of justifications are needed to allow this? Or, can all companies just have the option regardless the reason?

If the organization has concrete evidence that the mandatory control measures are inadequate and have to be replaced with alternative control measures, they need to refer Clause 4.13 of the FSC-STD-40-005 V3-1. It states:

The organization may replace mandatory control measures provided in the NRA with more effective control measures, under the following conditions:

a) The organization demonstrates that control measures provided in the NRA are inadequate to mitigate risk found in the organization's specific operations;

b) The organization demonstrates to the certification body that the alternative control measures are sufficient to mitigate the risk, and the certification body approves the alternative control measures;

c) The organization has, after approval by the certification body, forwarded a description of the alternative control measures, and justification for their use, to the body responsible for NRA maintenance (as defined in the NRA).

47. In an NRA one obligatory control measure establishes that a stakeholder consultation needs to be made 6 weeks before the harvesting, but in some cases the supplier can offer the wood already harvested to a certificate holder (CoC) with FSC-STD-40-005 in the scope... in our case (plantations with all legal permits verified). This would mean that the wood cannot be considered as CW?

If the mandatory control measure requires stakeholder consultation prior to harvest, then any material having that risk cannot be considered to be controlled material if the harvest was done prior to stakeholder consultation. However, in the event that the organization considers the mandatory control measures ineffective then, the organization may replace mandatory control measures provided in the NRA with more effective control measures, under the following conditions:

a) The organization demonstrates that control measures provided in the NRA are inadequate to mitigate risk found in the organization's specific operations;

b) The organization demonstrates to the certification body that the alternative control measures are sufficient to mitigate the risk, and the certification body approves the alternative control measures;

48. To what extent the identification of HCVs is required in the supply area? i.e. - shall the organization conduct a full survey for identification of HCV category 1.2 (species) and 1.3?

That would depend upon the extent of risk identified in the risk assessment, and the nature of the control measure that is designed to mitigate the risk. Depending on the area of sourcing, there

might be further functional classification in the risk assessment, which would provide more guidance on the level of identification of HCV categories 1.2 and 1.3.

49. When stakeholder does not answer, what to do? With INT_22 "affirmative and positive response from the stakeholders" how can we force responses from stakeholders.

Annex B of the FSC-STD-40-005 V3-1 standard specifies the minimum requirements that organizations need to fulfil while undertaking stakeholder consultations. This includes among other requirements, identifying relevant and interested stakeholders, notifying them of the consultation process and providing access to information. Provided these requirements are fulfilled, absence of stakeholder feedback does not constitute a non-compliance as far as the requirements of FSC-STD-40-005 V3-1 are concerned.

INT-STD-40-005_22 refers to affirmative and positive response from stakeholders. Lack of any response from stakeholders does not mean that there is an 'affirmative and positive response' for a low risk designation. It only means that either, a) stakeholder identification and outreach was insufficient, or b) stakeholders don't feel obligated to respond to the consultation, either out of indifference, or inability to comment or lack of knowledge or some other mitigating circumstances. INT-STD-40-005_22 is related to demonstrating 'low risk' for Controlled Wood Category 3 Indicator 3.2, and significant support from stakeholders is provided as one of the means of proving 'low risk'. If that is not possible, then certificate holders need to look at the other options provided.

50. Can NTFPs be used as controlled material, and are they also covered in the risk assessments?

Bamboo and NTFPs derived from trees (e.g. cork, resin, bark) can be used both in the percentage and credit system, however other types of NTFPs, such as food, medicine, rubber etc. that cannot be mixed with wood, is not eligible to carry FSC controlled wood claim. On the other side, they can be evaluated for forest management and carry "FSC 100%" claim. The Section on Terms and Definitions in FSC-STD-40-005 V3-1 defines Material as – "Material originating from a forest (e.g. wood and wood products, and nontimber forest products), or salvaged wood, without an FSC claim, that is being evaluated by the organization to determine whether it originates from acceptable sources." Therefore, as per the definition, NTFP is can be used as controlled material, and are covered by the risk assessment.

51. How much time does the CB have to approve the revised DDS after the adoption of CNRA or NRA?

There are no normative guidelines regarding the time when the CB must approve the DDS post adoption of the FSC risk assessment (CNRA or NRA). Once FSC risk assessment is approved, organizations have up to 6 months to update their DDS to the approved FSC risk assessment. The CB will evaluate the DDS based on the system it has established for verifying the relevance, effectiveness and adequacy of the DDS. Accordingly, based on the risk profile and the nature of the supply chain, the CB can choose when to verify the DDS, the latest being at the time of the next surveillance audit.

52. Can the CB who is certified a CH against the CW standard also act as the monitoring organization who developed wood legality DDS for the client?

The standard specifies that the certification body that evaluates the conformity of the organization with FSC-STD-40-005 V3-1 is not eligible to develop the DDS. However, as long as the wood legality DDS is separate and distinct from the DDS for FSC Controlled Wood as defined by FSC-STD-40-005 V3-1, the CB who evaluates the CH for this standard can be a monitoring organization for a wood legality DDS. Please note, conflict of interest arises if the CB is evaluating the organization for compliance to the requirements of FSc-STD-40-005 V3-1 and at the same time providing advice or consultation to the same organization on other aspects (e.g., wood legality DDS) which would contribute to the DDS. The organization cannot use the same CB to develop a document and at the same time evaluate it for conformance.

53. Do we need to evaluate risk of mixing if sub-supplier is trader without physical possession of wood?

No, the risk of mixing is applicable in case there is a risk that material is mixed with non-eligible inputs or material with a different origin, which would not allow the risk related to origin to be

confirmed. In case of a trader who does not take physical possession of the material, such a risk does not exist normally.

54. **Control measures that conflict with legal requirements, and the need for CB approval in these cases. Can you please explain this?**
Clause 4.3 of the FSC-STD-40-005 V3-1 states, "Where legal requirements may be in conflict with adequate control measures, control measures shall be approved by the certification body before they are implemented."

The intention here is not for CBs to approve control measures that are in conflict with legal requirements. in case adequate control measures are in conflict with legal requirements, the CH needs to inform the CBs to get other alternative control measures approved which can be used to mitigate risk, not all of which might be adequate.

55. **Would a company that has previously held CW certification but has since been terminated due to policy for association for an entity owned by the same parent company be an acceptable source of CW providing the risk assessment is shown to be low risk?**
Yes, it is possible. Controlled Wood risk assessments are undertaken for an area and not for a company. If the supply area is 'low risk' or has 'specified/unspecified risk' which has been mitigated, and there is no mixing in the supply chain, the material from that region can be sourced as controlled wood, irrespective of the ownership of the material or the supply unit.

56. **How often should field verification audits be conducted?**
There is no sample rate or frequency defined by controlled wood standard, the frequency depends on the risk, scale and intensity of the forest management activities where the field verification as a tool can sufficiently address the requirements of control measures and annual review/internal audit.

57. **if the stakeholder consultations are required as mandatory control measure is it possible to decrease somehow the time frame for consultation period from 6 weeks.**
e.g. the organisation already obtained the opinion from stakeholder by face to face meetings, so is it still possible to wait for 6 weeks?
Annex B of FSC-STD-40-005 V3-1, stipulates the requirements for stakeholder consultations, and it specifies a minimum period of 6 weeks prior to the forest management activities to initiate consultation. There is no possibility to decrease that time period.

In the example that has been quoted, the organization may arrange a face to face meeting with stakeholders to get their opinion. However, this does not reduce that requirement. The six weeks is required for many reasons including a) to give the possibility for all stakeholders to comment and not necessarily those who attended the meeting, b) to provide equal opportunities for all stakeholders to comment (in a face to face meeting, all stakeholders might not get an opportunity, or may be hesitant to provide feedback in a public forum), c) to provide an opportunity for stakeholders to provide evidence to substantiate their comments d) to provide opportunity for institutional stakeholders to consult their members/ stakeholders etc. and provide feedback etc.

58. **What is the definition of relevance, effectiveness and adequacy in case of implementation of DDS and this standard?**
The definition of these terms is not provided in the standard, and users shall use the common English dictionary definitions for these terms. However, it needs to be seen in the context of controlled wood and the utility of the DDS to ensure that unacceptable sources do not enter the FSC chain. Hence, the DDS should be relevant to the risks in the supply area and in the supply chain, effective in addressing the risks and adequate to ensure that uncontrolled material does not enter the FSC chain.

59. **Do the risks designated in CNRAs as 'specified' require mitigation by CH only on Forest Management Unit level in case it is a risk of origin?**
No, there is no specific requirement in this regard.

Clause 4.1 of the FSC-STD-40-005 V3-1 specifies that ""The organization shall have and implement adequate control measures to either avoid or to mitigate specified or unspecified risk related to origin and/or risk related to mixing with non-eligible inputs in the supply chain"".

The specific type of mitigation activity will depend on the nature of the risk and do not always absolutely require mitigation at supply unit level, unless the risk description and the related control measure demand that necessary level of control.

60. The Global Forest Watch maps have been updated up to 2016. Does this affect how IFLs are determined as per the standard?

FSC-STD-40-005 V3-1 Clause 4.11 states that, "Material shall not originate from commercial logging in Intact Forest Landscapes (IFLs) and shall not originate from areas where management activities contribute to/increase the fragmentation of IFLs."

IFLs have been defined as determined according to http://intactforests.org or http://www.globalforestwatch.org/map/3/15.00/27.00/ALL/grayscale/none/607 for the year 2013, or by an FSC risk assessment.

The standard is very clear that the base year for determination of IFLs continues to be 2013 and shall not be changed even though the database has been updated to 2016. The only possibility of a change in the IFL determination is through a change in the FSC Risk assessment itself.

The other option is for the region to be assessed under an NRA, in which case the Clause 4.11 does not apply.