



Forest Stewardship Council®



FSC-STD-40-005 V3-1

Key Implementation Issues

Controlled Wood Program
9th August 2019



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Introduction

The FSC-STD-40-005 V3-1 *Requirements for sourcing FSC Controlled Wood* standard has been in effect since July 2016. Since the roll out of the standard, there have been queries by stakeholders on various issues related to the implementation of the standard. While some of the concerns have been addressed by means of relevant interpretations, there were repeated requests from stakeholders for guidance on implementing some of the more difficult issues. FSC initially tried to address some of those issues by means of webinars and guidance material published on the FSC International website.

The goal of this guidance document is to provide an update to the old guidance material and additional guidance/information on implementation of the FSC-STD-40-005 V3-1 requirements. This document needs to be read in conjunction with the Controlled Wood FAQ (Frequently Asked Questions) document that was published along with this document.

Towards the end of this document, we have added a discussion on some options for risk mitigation, based on the outcomes of our work during 2018. We have taken the example of the Slovakia CNRA and compiled the control measures for specified risks in Slovakia from three different sources, namely,

- recommended control measures in the CNRA document;
- control measures discussed in the Joint Control Measures (JCM) project (without arriving at a consensus) and
- control measures being currently implemented by two companies A and B (the names are being withheld for confidentiality reasons).

This document is not exhaustive and would be updated with new guidance as and when required. It is to be noted that this document is not normative and is only intended to be used as guidance for implementing the CW standard. In case of any concerns or need for clarification, please contact the FSC Controlled Wood team at controlledwood@fsc.org.

Acronyms

CB - Certification Body

CH – Certificate Holder

COC - Chain of Custody

CNRA - Centralized National Risk Assessment

CW - Controlled Wood (Certification)

CWP - Controlled Wood Program

CW/FM - Controlled Wood Forest Management Certification

DDS – Due Diligence System

NRA - National Risk Assessment

Stakeholder consultation

Problem statement/concern

In the controlled wood normative documents, there are two types of stakeholder consultation, pertaining separately to CBs and CHs. For CHs, stakeholder consultation can be a control measure (in some cases it is mandatory), a means to verify the adequacy of the Due Diligence System (DDS), and a source of information for control wood evaluations. For CBs, stakeholder consultation is required when it is the first evaluation/re-evaluation **and** the material is being sourced from an unassessed area/ area with specified risk designation.

There have been questions by stakeholders regarding the practicality of conducting these consultations (due to the logistics involved and the large time durations) and their relative effectiveness due to:

- a) probable non-response/limited response from most stakeholders and,
- b) probable stakeholder fatigue due to the large number of stakeholder consultation requests, especially when there are only few stakeholders who can/might respond.

Furthermore, in some cases the consultation process is not practical in terms of fulfilling the six weeks' timeline before the commencement of forest management activities. In reality, materials might be sourced by certificate holders as semi-finished products/wood chips from suppliers after harvest activities are over.

Applicable normative requirements

FSC-STD-40-005 V3-1	
4.6	Whenever stakeholder consultation is required as a control measure, it shall be conducted according to the requirements in Annex B.
4.7	The organization may conduct stakeholder consultation according to the requirements in Annex B in order to verify the adequacy of its control measures.
4.8	In the case that unspecified risk is designated for controlled wood categories 2 or 3, the organization shall conduct stakeholder consultation as one of the control measures.
NOTE: Unspecified risk areas may result either from 'old NRAs' or from a company risk assessment conducted by the organization (see Annex A).	
Annex B Minimum requirements for stakeholder consultation ...	
FSC-STD-20-011 V4-0	
6	Evaluation of controlled wood according to FSC-STD-40-005 V3-0
	Stakeholder consultation
NOTE: Stakeholder consultation requirements apply only for the first evaluation and subsequent re-evaluations of the organization to FSC-STD-40-005 V3-0, as well as where material is sourced from unassessed, specified, or unspecified risk areas according to the applicable FSC risk assessment.	

Best practices

When is stakeholder consultation required for CHs?

CHs need to conduct a stakeholder consultation as a mandatory control measure only when 'unspecified risk' is designated for controlled wood categories 2 and 3. However, 'unspecified

risk' are found only in 'old NRAs' and company risk assessments, both of which are no longer valid after 30 June 2019. Therefore, unless stakeholder consultation is mentioned as a mandatory control measure in an NRA, there is no obligation for a CH to undertake stakeholder consultation. However, certificate holders *can* use stakeholder consultations as a

- a) tool for data collection;
- b) control measure for risk mitigation or
- c) tool to verify the relevance, effectiveness or adequacy of the DDS.

When is stakeholder consultation required to be undertaken by CBs?

As stipulated in FSC-STD-20-011 V4-0 section 4, stakeholder consultation by CBs is only required for the first evaluation and subsequent re-evaluations, **and** when material is sourced from unassessed or specified or unspecified risk areas.

What are the proper means of conducting consultation? Experience showed futile consultations and stakeholder annoyance, i.e. no feedback from stakeholders and stakeholders were frustrated by a flood of consultation emails.

Culturally appropriate means of communication could be very diverse depending upon the conditions. FSC-STD-40-005 V3-1 Annex B specifies certain means for stakeholder outreach. Mass emails need not be the only tool to engage stakeholders, and there exists other possibilities of stakeholder engagement like notifications published on CB's or CH's website, social media broadcast etc. Please refer to the following means of engagement which can be used.

- Face to face meetings
- Personal contacts by phone
- Email, or letter
- Notice published in the national and/or local press
- Notice published on relevant websites
- Local radio announcements
- Local customary notice boards
- Social media broadcast

Does consultation mean proactive engagement with stakeholders?

Proactive engagement with stakeholders is desirable to achieve the results of the consultation but is not always required. The CH/CB would need to identify the affected and interested stakeholders, and the means of outreach to them would need to be culturally appropriate.

Who are the stakeholders? Are sub-suppliers considered to be stakeholders?

Any party affected by and interested in forest management activities can be identified as a stakeholder. So, sub-suppliers could also be considered as interested and potentially affected stakeholders.

When it is mandatory to follow Annex B of FSC-STD-40-005 V3-1?

Whenever stakeholder consultation is being undertaken to fulfil the requirements of FSC-STD-40-005 V3-1, the consultation shall be performed according to the requirements given in Annex B of FSC-STD-40-005 V3-1.

There is a timeline constraint. Do CBs need a total 3 months or even 5 months for a main evaluation due to both CH and CB needing 6 weeks' timeline separately?

Not necessarily. Annex B of FSC-STD-40-005 V3-1 states the following two requirements

- a) All identified stakeholders shall be provided access to information that is relevant to the consulted issue no later than six (6) weeks prior to the management activity that is subject of the consultation and
- b) Identified stakeholders shall be invited to participate in the consultation at least six (6) weeks prior to the management activity that is the subject of the consultation.

These are the only two requirements to be followed by CHs. For CBs, where applicable, FSC-STD-20-011 V4-0 Clause 6.1 c) requires – “provide participating stakeholders with access to information as required in Section 6 of FSC-STD-40-005 V3-0 at least six weeks prior to the evaluation.”

In this case, especially when it is a re-evaluation, there is a need for more time. The CB needs to provide stakeholders with access to information, which includes the summary of the DDS of the CH. In turn, that summary would contain the summary of the CH's consultation processes performed according to Annex B where applicable.

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)?

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

When the organization conducts stakeholder consultation to demonstrate the effectiveness of risk mitigation measures, relevant national/regional stakeholders from the assessed supply area may not respond. Can a lack of response to stakeholder consultation demonstrate evidence of significant support?

No, the lack of a response to stakeholder consultation cannot be considered as evidence for significant support. Support to the effectiveness of risk mitigation by means of stakeholder consultation needs to be demonstrated by an affirmative and positive response from stakeholders. In case there is no response from stakeholders, CHs might need to explore other means of verifying the effectiveness of the risk mitigation measures.

Sampling methods

Problem statement/concern

The standard FSC-STD-20-011 V4-0 requires CBs to conduct field verification (at forest level and in the supply chains) based on a sufficient sampling pool to confirm risk mitigation. However, questions arise on what is the benchmark of “sufficient”, and what are the applicable/appropriate sampling methods. At present, there are no specific requirements regarding sampling in the normative documents. As a result, CBs have developed various systems for sampling. This however, could create concerns that different CBs have different levels of rigour in sampling, leading to concerns regarding homogeneity.

Normative requirements

FSC-STD-20-011 V4-0 EN
Evaluation of the organization’s DDS <u>General requirements</u> 6.2 The certification body shall 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. The certification body shall specify and justify in its system the means of verification of risk assessments and control measures established by the organization, including, but not limited to: a) a mechanism for verifying risk designations against available sources of information and applicable requirements; b) field verification ¹ with a scope and sampling pool relevant for the DDS under evaluation. The sampling pool shall be sufficient to confirm mitigation of risk related to origin and risk of mixing of material with non-eligible inputs; c) corroborating evidence provided by the organization with independent sources when possible. NOTE: Specific requirements for evaluating adequacy of control measures are included in Clause 6.18.

Best Practices

This section aims to provide some good practices for sampling during a controlled wood evaluation for CBs, and also as a guidance for CHs. These practices include those which are currently being implemented in the field by different CBs and CHs. Sampling is applicable for CBs to conduct field verification, but not always applicable for CHs. In general, all sourcing records shall be part of the sampling universe and CHs can confirm that each batch of input is eligible as controlled material by risk assessment and mitigation. As a control measure, CHs can define its sampling methods used for field verifications, document reviews, fibre testing, etc.

Field verification includes both audits at the forest level and on-site verification of suppliers in the supply chain. Therefore, sampling methods are not limited to the supply unit level but could also be extended to verification at the premises of suppliers and sub-suppliers.

The most commonly used sampling intensity based on random sampling of CH’s sample pool is as follows:

¹ Field verification includes audits at the forest level and on-site verification of suppliers in the supply chain.

$y=0.8*\sqrt{x}$, where y is the number FMUs sampled and x is the total number of FMUs in the sampling universe.

And in the case of SLIMFs:

$y=0.6*\sqrt{x}$, where y is the number of sets of SLIMF FMUs sampled and x is the total number of FMUs in the sampling universe.

In practice, both random (as shown above) and stratified sampling are recommended in the evaluation process.

Stratified sampling

Stratified sampling refers to a type of sampling method where the overall population is divided into separate sub-populations/groups, called strata. Then, a probability sample (often a simple random sample) is drawn from each group.

***Stratification** is the process of dividing members of the population into homogeneous subgroups before sampling. The strata should define a partition of the population. That is, it should be **collectively exhaustive** and **mutually exclusive**: every element in the population must be assigned to one and only one stratum. Then simple random sampling or systematic sampling is applied within each stratum. The objective is to improve the precision of the sample by reducing sampling error.*

Stratified random sampling is used when there is a need to highlight a specific subgroup within the population.

The process for performing stratified sampling is as follows:

Step 1: Divide the population into smaller subgroups, or strata, based on the members' shared attributes and characteristics.

Step 2: Take random samples from each stratum in a number that is proportional to the size of the stratum

Once the flow of material through the supply chains is understood, the sampling design can be finalised. The stratified sampling is applied to group the total supply chains into several strata/sampling pools according to different risks or characteristics. Some of the main factors which may impact the sampling pools or could be used for development of strata are:

Species level: e.g. certain species may only be available from natural forest, others may be sourced from plantations. There could also be different levels of risks regarding origin based on which species is being sourced from where.

Products level: Products like round wood, composite product, assembled product, or wooden chips are manufactured in various ways with different lengths of supply chain, which could suggest different risks of mixing or in the production process.

Supplier level: The location of suppliers and amount of material supplied can indicate the risk related both to origin and mixing, which can include the main type of forest in the origin, CPI of the country, labour rights in the country etc.

Having considered the above-mentioned risks, the supply chains can be classified into different sub-groups, within each sub-group, a formula multiplied by a risk factor can be

applied to determine how many samples are taken. Risk factor can vary from 0 to 1, depending on the different aspect of risks (in terms of FMU type, audit type, length of supply chain, etc.). In essence, the risk factors can be assessed and incorporated in the stratified sampling method. Please refer to the following examples.

Sampling Examples

As a first step, the CB with its CH shall clearly **map its supply chain** and include all the supplier and sub-suppliers in the DDS scope as a sampling pool (FSC-STD-40-005 V3-1 clause 1.2). The following are typical examples of supply chains of sourcing controlled wood.

Case A - a simple model

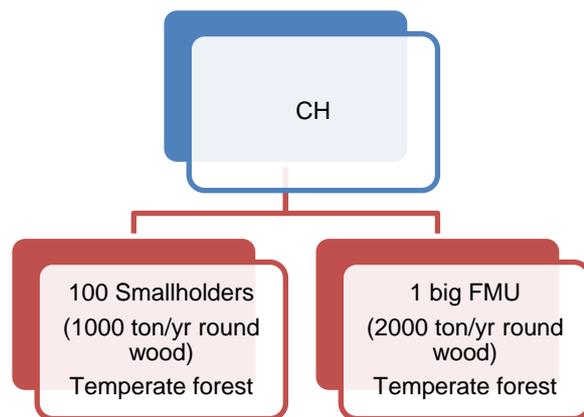


Figure 1. A simple example supply chain.

For Case A, the supply chain includes sourcing comparable amounts of round wood from 1 big FMU/supply unit and 100 smallholders. The CB field evaluations shall cover both suppliers: one stratum for the big FMU and another stratum for smallholders.

For evaluation of smallholders, a formula can be used as following:

$$y=R*\text{sqr}(x)$$

For big FMUs:

$$y=R*x$$

y = number of smallholders/FMUs to be audited, x = total number of smallholder/FMUs in the stratum

R is the risk factor based on the characteristics of FMUs, e.g.:

- 0,6 for FMUs with plantation, or boreal forest
- 0,8 for semi natural character of silviculture, or temperate forest
- 1 for natural character of silviculture, or tropical forest

The risk factors should be decided on a case by case basis and should be justifiable based on existing forestry conditions in the supply area. Very small risk factors ($R < 0.1$) are not a normal choice for sampling purposes.

In some instances, the specific samples selected for evaluation in the forest may also be affected by information provided by stakeholders, for instance when there is an alleged infringements regarding High Conservation Values (HCVs). In this scenario, the assessment may focus on specific FMUs.

Case B - a complex supply chain

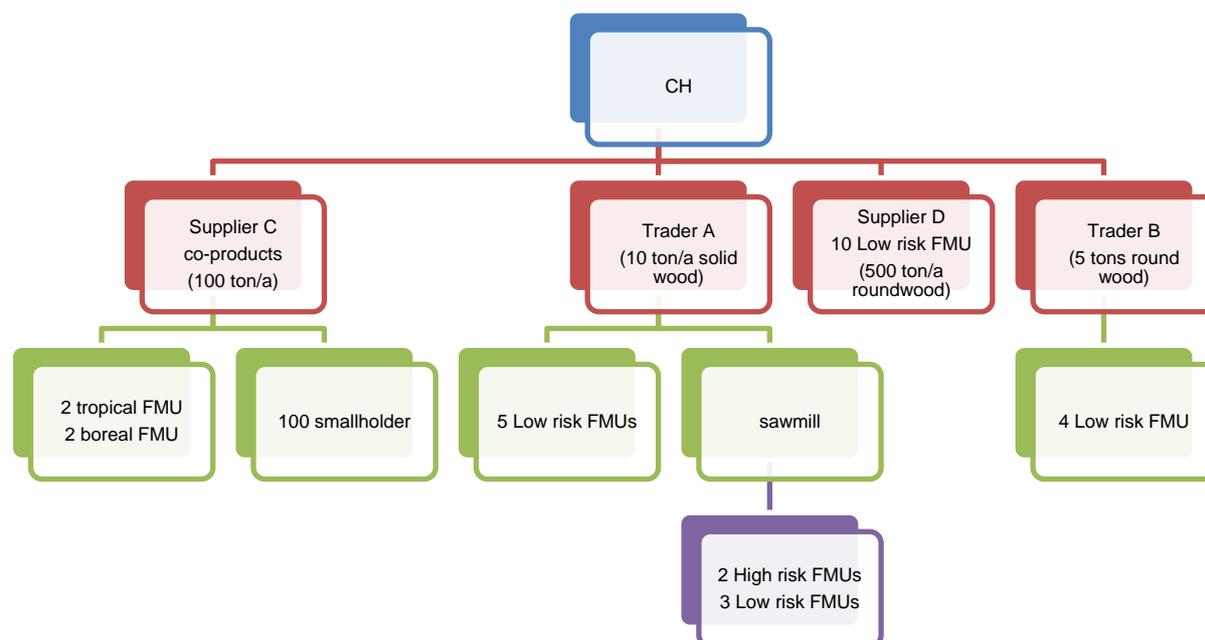


Figure 2. A complex example supply chain

Case B presents a more complicated example. To apply a stratified sampling method to the complex supply chain, we may first group the suppliers into two strata based on the volume of material sourced (for example, 500 ton/a as a threshold), or by the risks of FMUs, or by country of origin. There is no absolute numeric threshold that can be defined universally, but the consideration is dependent on the context, based on knowledge about the risks in the supply chains and the general forestry conditions in the area.

Within each stratum, the same general formula as the previous example can be applied.

$$y = R \cdot \text{sqr}(x)$$

For the purpose of this example, we will use the first option of stratifying the suppliers based on volume of material supplied per year. The first stratum includes all suppliers supplying less than 500 tons per year, and the second stratum includes all suppliers supplying 500 or more tons per year.

In the case of the first stratum (suppliers supplying less than 500 ton/a), the sampled suppliers can be calculated as:

$$y = 0.5 \cdot \text{sqr}(3) = 0.86$$

So, only one supply chain shall be chosen from the three suppliers in the stratum (Trader A, Trader B and Supplier C).

For the second stratum, only one supplier is present (supplier D). So, supplier D will be sampled regardless of the calculation with a formula and its risk factor.

From the first stratum, if the co-product supplier - Supplier C is chosen, another round of stratification may need to be applied at the FMU level. Looking back at Figure 2, you can see likely strata types (type of forest and size of holding). A sampling formula can be used. For example:

$$y = \text{Sqr}(2) = 1.4, \text{ so } 2 \text{ tropical FMUs shall be visited.}$$

$$y = 0.5 * \text{Sqr}(2) = 0.7, \text{ then } 1 \text{ boreal FMU shall be visited.}$$

$$y = 0.3 * \text{Sqr}(100) = 3, \text{ so } 3 \text{ smallholders shall be visited.}$$

Defining the risk factor “R” is flexible and can be influenced by different aspects (e.g. length of supply chain, country of origin, type of forest and product). The value of “R” could be decided by the CB based on existing forestry conditions e.g., higher risks for smallholders rather than big FMUs (or *vice versa*), higher risk factor for wood originating from tropical forests compared to boreal forests/plantations etc.

Sampling the FMUs under Supplier D is necessary, it will be:

$$Y = 0.3 * \text{Sqr}(10) = 0.94, \text{ so } 1 \text{ FMU shall be visited.}$$

The method illustrated above is a conceivable and ideal way of selecting samples, but without considering the availability of suppliers, seasonal activities and spatial/logistical constraints. The assessments may also be constrained by geographic locations if the sourcing of controlled wood is from various areas. The sampling could use the flexibility to focus on specific regions/FMUs/supply chain by field verifications during one sampling cycle and shift to another focus area during the next cycle.

Controlled wood supply chains can be likened to a tree-like structure (see below figure), so tracing back material until supply unit level can be challenging. Therefore, the best practice should aim to cover both breadth and depth of the supply chain during a five-year cycle.

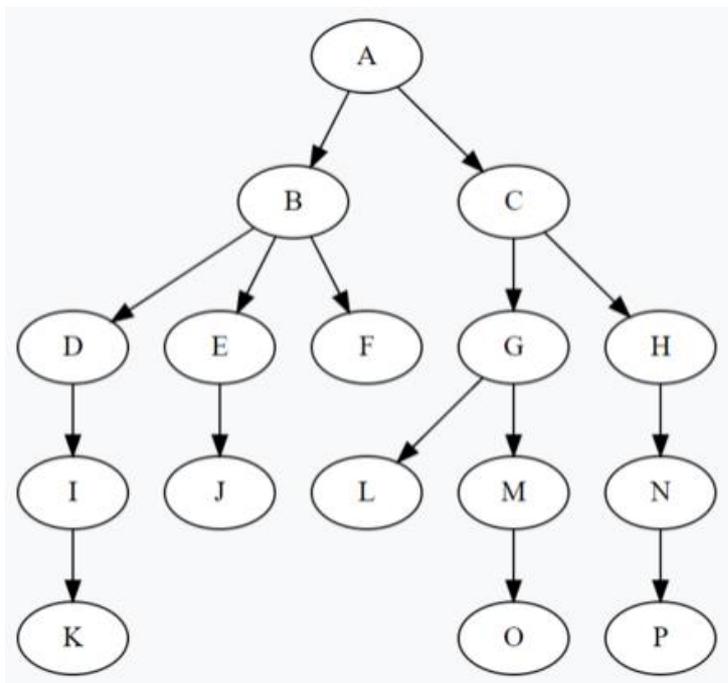


Figure 3. A demonstration of the structure of a supply chain.

Assigning non conformities to multiple clauses

Problem statement

During controlled wood evaluations, where there could be a non-compliance against more than one clause, several CBs have raised doubts as to which clause should be used to raise the non-compliance, or whether non-compliances against multiple clauses should be raised simultaneously. There are overlaps between different clauses regarding when FSC Controlled Wood can be sold or material can be used as eligible input in the form of controlled material. The requirements are similar in many cases but refer to differences in scope and details.

Normative requirements

FSC-STD-40-005 V3-1 EN	
1.1	The organization shall have, implement, and maintain a documented due diligence system (DDS) for material supplied without an FSC claim to be used as controlled material or to be sold with the FSC Controlled Wood claim.
1.5	The organization shall only use material as controlled material or sell material with the FSC Controlled Wood claim if it is in conformity with the requirements of this standard , confirmed through the DDS.
1.10	The organization shall not use material from supply chains where ineffectiveness of the DDS leads to, or might lead to, non-eligible inputs entering the production.
3.5	The organization may use material as controlled material and/or sell it with the FSC Controlled Wood claim if it has been confirmed as low risk for all indicators in the applicable risk assessment, and there is no risk of mixing with non-eligible inputs in the supply chains.
3.7	Whenever specified or unspecified risk related to origin and/or risk related to mixing with non-eligible inputs in the supply chain is determined, the organization shall implement the requirements of Section 4 before material can be used as controlled material or sold with the FSC Controlled Wood claim.
4.14	The organization may use material as controlled material or sell it with the FSC Controlled Wood claim after adequate control measures have been implemented.
5.3	The organization shall implement documented procedures covering all applicable requirements of this standard .

Best practices

The nature of any non-conformity should be thoroughly evaluated, and the non-conformity should be raised for the most directly relevant and specific clause. However, other affected clauses should also be referenced in the corrective action request (CAR) form. For example, if the non-conformance is related to the effectiveness of DDS, rather than the absence of documented procedures, clause 1.10 should be applied instead of clauses 1.1 or 1.5. Clauses 1.1 and 1.5 cover requirements of the entire DDS under FSC-STD-40-005 V3-1. The key words are highlighted in bold font in the above table. In principle, failure of clauses such as 1.1, 1.5, 3.7, or 5.3 is not common during a controlled wood assessment, as these would

indicate a complete failure of the DDS system. In such instances, there might not be much to achieve in proceeding with an onsite assessment.

Examples

The organization did not document the DDS but maintained a verbal or unconsolidated DDS.

- Nonconformity against clause 1.1

The organization maintained a DDS, but the auditor found it to be inadequate and ineffective and could lead to non-eligible material entering the supply chain.

- Nonconformity against clause 1.10

The organization cannot ensure there is no risk of mixing from one of its supplier's processing site, due to no evidence of physical segregation of controlled material and non-eligible material.

- Nonconformity against clause 3.5

The specified risk was designated, and the organization attempted to mitigate by applying control measures, however, the measures were not adequate to mitigate the identified risk.

- Nonconformity against clause 4.14

Risk mitigation against multiple indicators

Background

The main challenge for sourcing controlled wood is the risk management, via the effective implementation of a Due Diligence System (DDS). The DDS involves gathering information on supply chains, risk assessment (for material origin or mixing in a supply chain) and applying control measures where risk is identified. FSC has approved risk assessments for 56 countries (as of July 2019). While FSC-STD-40-005 V3-1 standard specifies the requirement for control measures to mitigate risks, there is a room for ambiguity on what constitutes adequate and effective control measures.

The FSC Controlled wood program had initiated a project (the JCM) to address this perceived ambiguity experienced by certificate holders and certification bodies. The project was initiated first in Slovakia, where an attempt was made to develop possible control measures with an interest balanced core team. In addition, FSC Controlled Wood Program also participated in assessments for two companies in Slovakia to understand how certificate holders were managing their risks.

Towards the end of this section, we have compiled the control measures for specified risks in Slovakia from four different sources viz,

- recommended control measures in the CNRA document
- control measures discussed in the JCM project (without arriving at a consensus)
- control measures being currently implemented by two companies A and B (the names are being withheld for confidentiality reasons)

General guidelines on development of control measures:

- a) Control measures should be developed based on how the organization identifies the risk within its supply chains and the operations of its suppliers, and the accepted level of risk (according to the requirements) in the particular conditions in which the organization operates.
- b) Different control measures can be established for different ownership structures, different groups of suppliers, different certificate holder types (e.g. primary vs. secondary manufacturers, pulp vs. round wood), etc.
- c) The control measures implemented depend on the type of specified risk. Mitigation of some risks will require verification by a field visit to the harvesting sites, or document control, or both.
- d) It is recommended that control measures comply with the SMART concept (i.e. all control measures should be specific, measurable, achievable, relevant, and tangible)

General examples of actions that may be taken as control measures:

- a. Stakeholder consultation;
- b. Complaints/Dispute resolution procedures
- c. Expert engagement;
- d. Document verification;
- e. Supply chain audits;
Field verification at the supply unit level or supplier's site;
- f. Third party verifications that cover scope of the specified risks (provided third party verifications result in mitigation of the specified risks as described in the CNRA);
- g. Tests to confirm species and/or origin, such as DNA tests, isotope tests and fibre tests (e.g. to confirm the origin of species covered by CITES);

- h. Legally binding agreements related to risk mitigation (e.g. conformance commitments with procedures, right to audit at any time, obligations to provide information within a certain time frame) with suppliers and sub-suppliers;
- i. Risk mitigation training and capacity building of suppliers and sub-suppliers;
Exclusion of suppliers

In general, developing control measures may be considered as a two-stage process:

- a. Defining the problem: Specifying what is the risk and how is it present in the supply chain. This stage involves gathering the relevant data to define the problem.
- b. Defining the solution: Devising the suitable mitigation measure based on the problem identified in stage a). Defining the solution involves identifying the solution to be implemented, detailing how to implement it, and describing how will the implementation be verified.

Certificate holders should look at the possibility of applying a set of control measures that tackle all the “specified risk” indicators simultaneously rather than attempt to mitigate each specified risk individually.

Example

The Slovakian CNRA designated 9 indicators as having “specified risks” regarding origin, and certificate holders need to ensure that they have mitigated all the risks before they can source controlled material from Slovakia. The risk mitigation for material sourced from Slovakia requires tracing material back to the supply unit, because the characteristics and designation of several risk indicators involved identification of protected areas and HCVs. Practically, certificate holders may synthesize different control measures to tackle all the risks simultaneously and in parallel, instead of implementing control measures separately for each indicator. For example, a control measure such as field verification can cover the mitigation for a number of indicators, which can be performed on a sampling basis. The recommended practice is to seek the most “common” measures with acceptable cost and effort for risk mitigation

Based on the analysis above, the common control measures that can be applied to most “specified risks” for Slovakia are:

- Document review;
- Random field verification;
- Confirmation from third parties.

Again, it is part of best practices to

- a) Develop checklists for document review and field verifications, so that there is uniformity in assessments in the field;
- b) Have a pre-developed list of documents/permits to be checked, including the contents of those documents and issuing authority;
- c) Use photos taken with geographic coordinates during forestry operation and field visits as evidence.

Examples of checklist

- **Document verification**

Forest management plan

The forest management plan should describe the description of forests, management practices, safeguards to the protected sites, species, HCVs and old-growth forest, etc.

- Harvesting permit

The harvest permit shall indicate the harvesting area, type and method for harvesting etc., Special attention shall be given to the salvage permit.

- Proof of origin and transportation documents

- Harvesting records

The harvesting records can be used for verifying the volume, species etc.

- Tax payment slips

- Supplier's declaration on non-discrimination of employment

- Photos taken by suppliers in the field

Photos can be taken with geographic location information and can reflect the conditions and forest operations by the suppliers. In some cases, suppliers could be requested to maintain a photo gallery for each consignment for future references.

- Other documents available

When not all the documents are available, information from the existing documents could be adequate to corroborate and draw a conclusion about the origin of the material.

- **Online maps available for verification**

The CNRA Slovakia designated "specified risks" which in many cases require comparison with the maps or layers of protected areas, HCVs and mountain forest etc. Along with existing local sources of maps and data, another possible source is to use the public data sources like <http://www.globalforestwatch.org/>

Global Forest Watch provided online interactive maps covering land use, tree loss and Intact Forest Landscapes. The interactive map enables exploring the forest area and the loss of forest cover in the past years, and potentially to identify the HCVs and protected areas.

- **Field verification**

Field verification should be done randomly to cross check the information collected from document review. However, it can also serve as a tool when it is difficult to acquire adequate information. The following items should be checked for the selected batch of material which sourced from a particular supply unit:

- Salvage logging is confined within the limits of the salvage permit, if applicable;
- Only selective/single tree logging systems is applied in the mountain forests below tree line (specific for Slovakia – please refer risk assessment);
- Forestry operation is not destructive or exploitative, the management does not threaten the existence of protected species and site, high conservation values;
- Logging does not occur in the old-growth forest, 'Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe' UNESCO World Heritage site (specific for Slovakia – please refer risk assessment);
- Intensive forest management does not take place in forests reclassified as protected areas;
- No discrimination was reflected by local workers and contractors.

- **Confirmation from third parties/stakeholders**

Confirmation by interviews/responses from third party sources such as forest contractors, workers, local peoples, local authorities or forest managers rather than from the direct supplier. The confirmation is a supporting evidence or corroboration of existing information. For example, a supplier declared an employment policy on non-discrimination, and the workers confirmed that during the recruitment process no discrimination took place. The confirmation records shall be kept, with details that can be related to a particular supplier or supply unit.

To summarize, by creating “overlapping” control measures, certificate holders can verify and reaffirm information provided by suppliers and mitigate all 9 “specified risks” in parallel.

Control measures for specified risks in Slovakia CNRA

The following table compares the risk mitigation measures derived from different sources. It includes control measures recommended in the Slovakia CNRA document, suggested control measures that were outcomes of the JCM project, and control measures that are being implemented by two different companies in Slovakia. This table is intended not only for users sourcing from Slovakia, but from Europe as a whole and potentially across the globe.

The intent of this table is **not to verify** the correctness, relevance, adequacy or effectiveness of any or all of the control measures listed below, which would be best evaluated by the respective certification body. This table is only intended to provide an illustration of the whole *suite* of possible control measures that are available to mitigate a range of risks. We hope that certificate holders can use some of the examples of actual control measures given below to devise other similar mitigation measures which are most suited to their supply chains. **The table below is only illustrative in nature and is neither normative, nor exhaustive.**

Risk Indicator	Risk description	Recommended CMs in CNRA	Suggested control measures in Joint Control Measure project	Company A	Company B
1.4	<p>Spruce (<i>Picea abies</i>) harvest under salvage permits</p> <p>The total amount of harvested wood in Slovakia has exceeded the total Maximum Allowable Cut as result of salvage fellings between years 1994-2011. This is despite the gradual increasing of prescribed felling from 5,16 mil. m³ in 1990 to 8, 87 mil. m³ in 2012. Some specialists and NGOs say that salvage fellings are not sufficiently controlled by forestry authorities and often affects healthy trees. Licensed forest managers (OLH) have to report salvage fellings if they exceed 20% of overall inventory of a compartment or if it affects a continuous area of more than 0,5 ha, but the legitimacy of salvage felling is often not checked by responsible authorities. This is the case for especially spruce stands, as it is very complicated to prove if healthy trees or trees affected by bark beetles were harvested, which creates room for potential abuse.</p>	<p>Control measures are only applicable when sourcing Norway Spruce.</p> <p>Proposed risk mitigation steps when sourcing spruce:</p> <ol style="list-style-type: none"> 1. Do you have access to place of harvest, harvesting permit and harvesting records? Yes: go to 2 No: do not buy 2. Does the harvesting permit and harvesting records state that logging is conducted as salvage felling? Yes: go to 3 No: low risk 3. Can it be verified that the wood was in fact able to be logged under a salvage permit? - verification of timber showing signs of bark beetle at receipt or; - on-site verification confirming disturbance (e.g. sign of bark beetle attach, wind fallen or dead trees etc.) and eligibility of salvage felling (whether dead or affected trees has been harvested) and whether harvesting permits, harvesting records (area species volumes) and maps are in compliance with reality. Yes: Material can be sourced No: Do not buy <p>Note: Risk mitigation will only be possible when sourcing directly from the forest.</p>	<p>The following control measures apply only for salvage fellings and not for regular harvests, which are outside the scope of this risk.</p> <p>Control Measure A</p> <ol style="list-style-type: none"> 1. Document information about origin of material including origin and nature of harvest – whether it is regular harvest or of salvage felling/sanitation felling. Where possible, the organization should document information on salvage fellings in the previous year, total proportion of salvage fellings from annual spruce harvest and probability of felling in next year. 2. Collect information from state forest authority about any non-compliance with applicable legislation related to salvage fellings. If yes, exclude the supply units from DDS. In not, go to next step. 3. In areas where salvage fellings is occurring, undertake document review - all salvage fellings which exceed 20% of inventory of the compartment and/or exceed 0.5 ha by area need to be reported. The organization verifies these reports and confirming the same with the state/federal forest authorities. If the documents maintained by state forestry authority confirm abuse of salvage felling rules such supply units shall be excluded from supplies until appropriate corrective/preventive measures are implemented to comply with legal requirements. 4. In areas where salvage felling is occurring, undertake stakeholder consultations to determine whether any salvage fellings have occurred which exceed 20% of inventory of the compartment and/or exceed 0.5 ha by area and have not been reported to the authorities. In such case, the organization shall further investigate, and if confirmed that noncompliance to regulations has taken place, exclude the supply unit from DDS. 5. Where possible, salvage fellings can be determined by visual/photographic evidence and documentation (not always viable as salvage/sanitation fellings may also include nearby healthy trees, and this is a commonly accepted and recommended practice for silvicultural control) 6. In cases where risk of abuse of salvage felling provisions is still existing, the organization shall implement procedures for random sampling and field inspection of harvest sites to determine salvage fellings. Sampling intensity shall be based on: <ol style="list-style-type: none"> a. Percentage of sanitation/salvage felling from the overall yearly allowable cut; b. Total quantity of material procured from the area c. Number of affected supply units <p>Control Measure B</p> <ol style="list-style-type: none"> 1. The organization collects and analyses information from third parties through a complaints/dispute mechanism, stakeholder consultation and/or co-operation with a relevant body (e.g. state forest administration) in order to identify areas of risk that the legal requirements relating to salvage felling are violated. 	<ul style="list-style-type: none"> - Physical inspection of logs at intake for signs of bark beetle infestation (pictures taken). - In case that green logs (no signs of bark beetle) are found at the intake – request to FMU of origin whether the green logs come from normal planned harvest or from sanitation felling caused by abiotic factors (wind throw, snow, frost) - Random physical inspection of harvesting sites in case that green logs appear at the intake and designation of sanitation/salvage felling are biotic factors (bark beetle, fungi). Sampling is based on: <ol style="list-style-type: none"> 1. Percentage of sanitation felling from the overall yearly harvest 2. Volumes supplied from the area 	<ul style="list-style-type: none"> - Physical inspection of logs at intake for signs of bark beetle infestation (pictures taken). - In case that green logs (no signs of bark beetle) are found at the intake – request to FMU of origin whether the green logs come from normal planned harvest or from sanitation felling caused by abiotic factors (wind throw, snow, frost) - Random physical inspection of harvesting sites in case that green logs appear at the intake and designation of sanitation/salvage felling are biotic factors (bark beetle, fungi). Sampling is based on: <ol style="list-style-type: none"> 1. Percentage of sanitation felling from the overall yearly harvest 2. Volumes supplied from the area

			<p>2. The organization evaluates evidence received from suppliers identified from specified risk areas as identified in step 1 and carries out on-site field verifications where required to establish whether legal requirements for salvage fellings have been met. Following the results of the evaluation, the organization shall define appropriate corrective and/or preventive measure, including exclusion of material from its procurement where necessary.</p> <p>Control Measure C</p> <p>1. The organization collects information on compliance with legal requirements related to salvage fellings and where there is information that salvage fellings are/may be in violation of legal requirements, it carries out additional evaluation.</p> <p>2. The organization carries out the additional evaluation as a sampling based verification. The sampling shall include both document as well as field level verification and shall be based on:</p> <ol style="list-style-type: none"> Percentage of sanitation/salvage felling from the overall yearly allowable cut; Total quantity of material procured from the area Number of affected supply units <p>3. The organization shall verify through the above sampling whether legal requirements for salvage harvests have been met. Following the results of the evaluation, the organization shall define appropriate corrective and/or preventive measure, including exclusion of material from its procurement where necessary.</p> <p>Control Measure D</p> <p>1 In areas where third party verification of supply units covers the scope of this risk, the evidence used for verifying conformance to the requirements may be used as control measure.</p>		
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Comment:
The risk described in indicator 1.4 refers to the abuse of salvage felling permit that may lead to removal of healthy trees. In some cases, this may be required to prevent further spread of the infestation. However, there do exist the possibility/risk of someone exploiting salvage fellings for short term gains.
In forestry, salvage felling is a form of intermediate management that removes insects or diseases or damaged trees from a stand, for the purpose to improve the existing stand of trees. Over the long term, salvage felling is usually without economic benefit, since it could result in immature trees being removed, sudden glut of material in the market depressing prices and additional expenses for the forest manager arising out of unplanned regeneration expenses

1.6	<p>Specified risk-protection and special purpose forest</p> <p>Problems with designation of protection and special purpose forest and implemented measures have been identified. These forests require specific management and have an exemption for local taxes. Some forest managers (mostly non-state) want to declare such forests to avoid (or decrease) local taxes but without a change of management. Forest Authorities should approve designation of these forest only if there are significant changes in management compared to management in production forests. There are many contradictory decisions of forestry authorities connected with this issue. Sometimes forests with standard management (similar to production forests) were approved as protection and special purpose forests while in some cases forests with very different and very specific management (e.g. strict protected areas) were not approved and remained as production forests.</p>	<p>Control Measures are only applicable in case wood is sourced from non-state managed protection or special purpose forest.</p> <p>Proposed Risk Mitigation steps:</p> <p>1. Can the timber be traced back to MU of harvest? Yes: go to 2 No: do not buy</p> <p>2. Does timber come from forest managed by state organization? Yes: Low risk No; go to 3</p> <p>3: Does the MU have any area classified as protection or special purpose forest - summary information for MU of forest categories (production, protection or special purpose forests) are made public at http://gis.nlcsk.org/lgis/. Yes: go to 4 No: Material can be considered as low risk for this category</p> <p>4: Can the harvesting site be documented? - transport documentation (proof of origin), harvesting permit and harvesting records Yes: go to 5 No: Do not buy</p> <p>5. Does timber come from protection/special purpose forest? - Information on protected and special purpose forest areas</p>	<p>Designation change for a forest area from 'production' to 'protection/special purpose' forests leads to a reduction in the local taxes. However, this also needs to go along with adoption of different management models and ideally be reflected in the total production levels from that forest. i.e., protection forests should be yielding reduced quantities once they have been redesignated as protection/special purpose forests.</p> <p>Control Measure A</p> <p>1 Verify if the material is originating from an area categorized a protection/special purpose forest. If not, conclude no risk, if yes continue to next step.</p> <p>2 Consult stakeholders (nature conservation authority, NGOs, municipalities) on justification for the change in forest category.</p> <p>3 Verify whether change from production to protection/special category forests resulted different forest management models and/or in reduced production volumes (need for document verification of annual production levels and comparison with previously approved management plans) if yes, no risk, if no, continue to step iv)</p> <p>4 If there is no reduction in volumes, nor change in management models, are the present production levels as per an approved management plan? (e.g. review of AAC established and approved in the management plan vs actual) If yes, no risk, if no, cease further sourcing form these areas.</p> <p>Control Measure B</p>	<p>- Verification if the material is originating from an area categorized a protection/special purpose forest. If not, conclude no risk, if yes continue to next step.</p> <p>- Verification whether change from production to protection/special category forests which resulted in change of Forest Management Plan is being implemented in practice.</p> <p>- Verification of harvested volumes and type of harvest based on harvest prescription and/or occurrence of salvage/sanitation fellings.</p>	<p>- Verification if the material is originating from an area categorized a protection/special purpose forest. If not, conclude no risk, if yes continue to next step.</p> <p>- Verification whether change from production to protection/special category forests which resulted in change of Forest Management Plan is being implemented in practice.</p> <p>- Verification of harvested volumes and type of harvest based on harvest prescription and/or occurrence of salvage/sanitation fellings.</p>
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Comment:
 The risk designation of indicator 1.6 for Slovakia is regarding the tax avoidance through incorrect declaration of forest classifications from production forest to protected forest, while the purpose of forest management does not change. Slovak legislation prescribes that every harvest must be approved by a licensed forest manager (OLH). As a control measure, companies can corroborate the harvest permit and verify the tax payment slips to see whether the wood were harvested from protected forest without any taxation. The following documents available will be useful to corroborate the fact and mitigate the risk:

- Forest management plan
- Harvesting permit
- Proof of origin such as transportation documents
- Harvesting records
- Tax payment slips

1.9	<p>Wood sourced from protection sites (Sites with level 3-5 of protection according to national legislation, NATURA 2000 areas)</p> <p>Most of the protected areas in Slovakia still have not prepared or approved a Management Plan of Protected Areas, all human activities in protected areas are regulated only by Nature Protection Act (consist mostly of restrictions but not specific protection measures).</p> <p>Information about endangered, rare and threatened species is not integrated in the forest management plan. Forest managers often do not have information about these species and protection measures which should be implemented as required by law. Sites and species protection then depend on the individual approach of foresters and the assumption that the forest manager will actively cooperate with other specialists. This cooperation sometimes works very well but there are many cases where disputes between forest managers and Nature Conservancy or NGOs are an obstacle of proper protection of sites or endangered, rare and threatened species. In some cases, there are even opposing decisions between state authorities (Forestry and Environmental authorities) regarding</p>	<p>Proposed Risk Mitigation steps:</p> <p>1. Can the timber be traced back to MU of harvest? Yes: go to 2 No: do not buy</p> <p>2: Does the MU have any area with protection level 3 to 5, or NATURA 2000 sites (http://gis.nlcsk.org/igis/,) - information about protection level is available at http://gis.nlcsk.org/igis/. - information about Natura 2000 sites are available at http://globus.sazp.sk/uev/ (habitat directive) and http://geo.enviroportal.sk/vu/ (birds directive) Yes: go to 3 No: Material can be considered as low risk for this category</p> <p>3: Can the harvesting site be documented? Yes: go to 4 No: Do not buy</p> <p>4: Is the harvesting site located in protection forest class 3 to 5 or NATURA 2000 sites? Yes: go to 5 No: Low risk for this category</p> <p>5. Does Forest Manager have information about all legally protected areas and species (including habitats)? - Endangered, rare and threatened species shall be identified in the forest management plan or other management documentation or maps Yes: go to 6 No: Do not buy</p> <p>9. Does an on-site visit and management records review confirmed compliance with environmental legislation (sites and species protection); Yes: low risk</p>	<p>NOTE: State Nature Conservancy has a list of areas which have a management plan, and this list is a publicly available document. The following control measures apply only to those areas outside that list.</p> <p>Control Measure A</p> <p>1. The organization collects and analyzes information/evidence from third parties by a complaints/dispute mechanism, stakeholder consultation and/or co-operation with a relevant body in order to identify legally protected sites (with protection category 3-5) and Natura 2000 areas (with 1st and 2nd level of protection) without nature management plan where the protected values are threatened by management activities. Consultations with stakeholders shall be as per the requirements given in Annex B of the FSC-STD-40-005 V3-1 standard.</p> <p>2 The organization evaluates evidence received from the relevant forest owners/managers and from the relevant Nature Conservation Authorities and where necessary, carries out field verifications to i) complement the information received from these authorities, and identify with more precision areas where HCVs are threatened ii) Work with experts (identified as per Annex C of the FSC-STD-40-005 V3-1 standard), environmental NGOs and/or use publicly available information to identify areas where forest management operations can be undertaken without threatening the HCVs iii) in areas where management operations threaten HCVs, establish and implement corrective or preventive actions to mitigate the threat, or, if threat not mitigatable, cease procurement from such areas.</p> <p>Control Measure B</p> <p>1. The organization provides evidence that material does not originate from protection sites with level 3-5 of protection according to national legislation and/or NATURA 2000 areas without approved Nature Management Plans</p>	<p>- Thorough research of nature conservation and nature protection areas distribution. Preparation of overlay of cadastral maps with nature protection areas layer for identification of boundaries of 1.-3- protection level areas and Natura 2000 areas. - Identification of deliveries down to FMU cadastral unit and potentially harvesting permit. - The organization collects and analyses information/evidence by (a) complaints / dispute mechanism and/or (b) stakeholder consultation and/or (c) cooperation with a relevant body (e.g. state administration/state authority) in order to identify legally protected sites (category 3-5 and/or Natura 2000 areas) which have been damaged or are in risk of being damaged by forest management activities. - The organization evaluates evidence received from these areas and where necessary carries out on-site verification to establish whether the values for which the legally protected areas have been designed are damaged. - On site field verification shall be undertaken at a sampling intensity commensurate with the scale, intensity of the risk. - Upon the areas where the risk of threat to legally protected sites has been proved organization requires manager of FMU to implement appropriate measures to mitigate this</p>	<p>- Thorough research of nature conservation and nature protection areas distribution. Preparation of overlay of cadastral maps with nature protection areas layer for identification of boundaries of 1.-3- protection level areas and Natura 2000 areas. - Identification of deliveries by GPS., cadastral unit and potentially harvesting permit. - The organization collects and analyses information/evidence by (a) complaints / dispute mechanism and/or (b) stakeholder consultation and/or (c) cooperation with a relevant body (e.g. state administration/state authority) in order to identify legally protected sites (category 3-5 and/or Natura 2000 areas) which have been damaged or are in risk of being damaged by forest management activities. - The organization evaluates evidence received from these areas and where necessary carries out on-site verification to establish whether the values for which the legally protected areas have been designed are damaged. - On site field verification shall be undertaken at a sampling intensity commensurate with the scale, intensity of the risk. - Upon the areas where the risk of threat to legally protected sites has been proved organization requires manager of FMU to implement</p>
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	intervention in protected areas habitats, or species protection.	No: Do not buy	Control Measure C 1 Evidence of conformity to third party verification programs that covers in its scope the specified risk covered in this indicator. Evidence provided for meeting requirements for third party verification programs may be considered as a control measure.	threat or stops procuring the timber from the identified area.	appropriate measures to mitigate this threat or stops procuring the timber from the identified area.
Comment: The risk mitigation of indicator 1.9 in general requires detailed information that can trace material back to the supply unit, and it should prove either the material is not sourced from protected area (Sites with level 3-5 of protection according to national legislation, NATURA 2000 areas), or there are evidences demonstrating the forest management does not threaten the existence of protected species and sites. The control measures include: <ul style="list-style-type: none"> Document review to confirm the origin of material and the status of protection, including management plans, transportation documents and harvesting permit. Random sampling to the supply unit and onsite verification to confirm the proper forest management without threatening the protected species and sites. 					
1.21	There is illegal logging legislation that covers domestic production but no new legislation for imports. For enforcement of some of the requirements of the EUTR, current national legislation is applicable (especially concerning forest owners and users). Within this legislation there is no due diligence provision. There are sanctions regarding illegal logging, but they do not apply to imports and are not specific to placing timber on the EU market or due diligence. There are no provisions for confiscating wood, and the competent authority (CA) is not empowered to act.	1. Can the material be tracked back to the entity placing it on the market - the Operator? - If the timber is sold as standing stock to a logging company, the logging company will be the operator. - If the timber is sold as assortment by the forest owner/manager, then the forest owner/manager will be the operator. If no - do not buy. If yes - go to 2 2. Can the operator document that a Due Diligence System is in place in accordance with the EU Timber Regulation No 995/2010 (EUTR)? Operators placing for the first time on the internal market for distribution or use in the course of a commercial activity any products listed in the annex to Regulation (EU) No 995/2010 (EUTR) should present: - documents required according to article 4.2 and 6 of the Regulation (EU) No 995/2010, - documents required according to article 3, Commission Implementing Regulation (EU) No 607/2012, - register of information concerning the operator's supply as provided for in Article 6.1 a) of Regulation (EU) No 995/2010 and documentation of application of risk mitigation procedures. If no - don't buy If yes - risk mitigated for this point.	The specified risk is pertaining to imports, which is not covered by the illegal logging legislation. Control Measure A The organization needs to prove that the material was harvested from within Slovakia, and all legal procedures for felling, harvest and transportation were followed. 1. In case the timber was harvested in Slovakia the risk is considered as "low". 2. In case the timber was imported to Slovakia prior to April 1, 2018 documents shall be reviewed to prove the origin of the timber: a) in case the timber originates from the EU, the risk is considered "low". b) in case the timber originates from outside the EU, the importer shall provide information to prove to have access to the origin of the timber and has used his own DDS to show compliance with the EUTR. (Note: Slovakia has approved national legislation relating to EUTR on 14 th March 2018 that is effective as of 1 st July 2018. Therefore, the risk may be downgraded to low during next revision.) Control Measure B 1. Evidence of conformity to third party verification programs that covers in its scope the specified risk covered in this indicator. Evidence provided for meeting requirements for third party verification programs may be considered as a control measure. Control Measure C 1. The organization collects information/evidence from third parties by complaints/dispute mechanism, stakeholder consultation and/or co-operation with a relevant body in order to identify forest owners that are violating national legislation relating to the EUTR. It evaluates evidence received from the suppliers from these areas and where necessary carries out an on-site audit to establish whether the EUTR related legislation has been violated. Following the results of the evaluation, the organization shall define appropriate corrective and/or preventive measures, including exclusion of material from its procurement where necessary.	N/A – Timber sourced from Slovakia no import	N/A – Timber sourced from Slovakia no import
Comment: The specified risk pertains to imports of timber which is not covered by the illegal logging legislation. Companies needs to ensure that wood is sourced within Slovakia and keep all the relevant documents and records.					
2.2	Specified risk for discrimination of Roma in the Labor Market. Share of Roma in total population – 7.45% Majority living in the less developed eastern and southern regions of Slovakia. Roma are over represented	Guidance: CM should be based on clear evidence that the Organization has policies in place that prevent discrimination against Roma in the labor market.	General Control measures for this indicator could be of two types: a) Measures to always avoid discrimination and to respond to instances of discrimination and b) In areas with Roma population or 'socially excluded locality' of Roma within the procurement region, one can, in addition to a), contribute to undo existing or perceived discrimination.	Verification that suppliers have implemented policy against discrimination. Gradual implementation of anti-discrimination into purchase contracts for wood.	Verification that suppliers have implemented policy against discrimination. Complaint procedure for dealing with potential discrimination in forestry within the area of timber procuring.

	<p>among the poor and are largely excluded from the formal labor market and represent a high proportion of the unemployed. Major causes for high unemployment rates in Roma are: (1) lack of general education and vocational qualification valued on the labor market; (2) residential segregation and marginalization; (3) exclusion from the primary labor market and relegation of activities to the grey economy; (4) significant gender gap, (i.e. besides low rate of employment among Roma man, Roma women are even more excluded from the labor market); (5) extent of labor market discrimination.</p> <p>8% of employed Roma work in agriculture and forestry sectors. There is substantial evidence confirming the widespread discrimination of Roma in the labor market. Examples of such discrimination could include - not hiring a person because he/she is Roma although having the same or better qualifications than other applicants, paying less than other employees for similar work, different/less benefits while being in the same position as others, (social) exclusion, harassment, giving less career opportunities, etc.</p>		<p>a) <i>Avoiding discrimination</i></p> <p>Control Measure A</p> <ol style="list-style-type: none"> 1. The organization collects and analyses information from third parties through multiple mechanisms including - a complaints/dispute mechanism, stakeholder consultation and co-operation with a relevant body regarding information/evidence of Roma discrimination in the forestry sector. This information collection should include asking annually at least one relevant governmental or non-governmental organizations/institutions in each Slovakian region e.g., Office of "Úrad splnomocnenca vlády pre rómske komunity"; regional Slovakian institutions include – for example, Slovenské národné stredisko pre ľudské práva (has four branch offices – each for two Slovakian regions and it is the official organization for implementation and realization of Slovak anti-discrimination etc.); 2. The organization undertakes a public stakeholder consultation at least annually (as per Annex B of the FSC-STD-40-005 V3-1). 3. The organization collects evidence that action has been taken when discrimination was noticed or reported. 4. The organization has a publicly available organization written policy against discrimination signed by top management. 5. The organization incorporates a clause about anti-discriminatory policy in its contracts with suppliers. These clauses shall be legally enforceable and shall also include contacts of relevant and competent governmental institutions to be contacted in case discriminatory behavior occurred/s; and <p>b) <i>Positive/affirmative actions</i></p> <p>Control Measure B</p> <ol style="list-style-type: none"> 1. Documentation of active processes for engaging with Roma community members/organizations, especially in regions where there are known cases of discrimination 2. Documentation of and active processes to reach out to Roma community members/organizations were made by the organization (e.g. through a support of local Roma/pro-Roma NGOs and their [social work] projects or an active work with labor offices and long-term unemployed or disadvantaged people). 3. Explore possibility of setting up quotas for employment for disadvantaged jobseekers. 	<p>Complaint procedure for dealing with potential discrimination in forestry within the area of timber procuring.</p>	
<p>3.1 HCV 1</p>	<p>Forests with 3rd – 5th level of protection without a Nature Management Plan. Forests with 1st or 2nd level of protection without a Nature Management Plan that are also, or also contain, NATURA 2000 areas.</p> <p>HCV1 is identified in the area under assessment and it is threatened by management activities through habitat removal and/or fragmentation and/or facilitating invasive species encroachment for protection sites with level 3-5 of protection according to national legislation and/or NATURA 2000 areas without approved Nature Management Plans are considered Specified risk</p>	<p>Confirm low risk by ensuring protected sites under 3 – 5th level of protection and/or Natura 2000 areas have approval Nature Management Plans by cross checking this website: list of approved NMP: http://www.sopsr.sk/web/index.php?cl=119 information about Natura 2000 sites are available at http://globus.sazp.sk/uev/ (habitat directive) and http://geo.enviroportal.sk/vu/ (birds directive)</p> <p>For protected sites under 3 – 5th level of protection and/or Natura 2000 without Nature Management Plans are managed according to the designated level of protection under Law no. 543/2003 Coll. on nature conservation through: RTE surveys must be conducted by experts (under State supervision; Ministry of Environment-approved list of relevant experts: http://www.minzp.sk/postupy-ziadosti/ochrana-prirody-krajiny/registre-zoznamy/) to identify the location of RTE; with forest management plans then adjusted accordingly to ensure these HCVs are not threatened (for example following HCV Guidelines; 6)</p> <p>OR</p>	<p>NOTE: State Nature Conservancy has a list of areas which have a management plan, and this list is a publicly available document. The following control measures apply only to those areas outside that list.</p> <p>Control Measure A</p> <ol style="list-style-type: none"> 1. The organization collects and analyzes information/evidence from third parties by a complaints/dispute mechanism, stakeholder consultation and/or co-operation with a relevant body in order to identify legally protected sites (with protection category 3-5) and Natura 2000 areas (with 1st and 2nd level of protection) without nature management plan where the protected values are endangered by harvesting activities. Consultations with stakeholders shall be as per the requirements given in Annex B of the FSC-STD-40-005 V3-1 standard. 2. The organization evaluates evidence received from the relevant forest owners/managers and from the relevant Nature Conservation Authorities and where necessary, carries out field verifications to: <ol style="list-style-type: none"> i) complement the information received from these authorities, and identify with more precision areas where HCVs are threatened 	<ol style="list-style-type: none"> 1. Thorough research of nature conservation and nature protection areas distribution. Preparation of overlay of cadastral maps with nature protection areas layer for identification of boundaries of 1.-3- protection level areas and Natura 2000 areas without nature management plan where the protected values may be endangered by harvesting activities. 2. Identification of deliveries by compartment., cadastral unit. 3. The organization assists in establishment / adoption / adaptation of adequate measures in forest management plans or internal guidelines of FMEs ensuring that forestry operations comply with conservation goals of protected areas. 4. The organization evaluates evidence received from the relevant forest 	<ol style="list-style-type: none"> 1. Thorough research of nature conservation and nature protection areas distribution. Preparation of overlay of cadastral maps with nature protection areas layer for identification of boundaries of 1.-3- protection level areas and Natura 2000 areas without nature management plan where the protected values may be endangered by harvesting activities. 2. Identification of deliveries by GPS., cadastral unit. 3. The organization assists in establishment / adoption / adaptation of adequate measures in forest management plans or internal guidelines of FMEs ensuring that forestry operations comply with conservation goals of protected areas. 4. The organization evaluates evidence received from the relevant

		<p>RTE surveys led by forest owners need to be reviewed and agreed upon with relevant NGO groups (forest protection: LZ Vlk, oz Prales, WWF; habitats/species: Daphne; species: SOS/BirdLife Slovakia; Bat protection: WWF) and the regional responsible office of the SNC SR; therefore, management should be adjusted to the requirements of the relevant species.</p> <p>AND/OR</p> <p>Endemic species surveys must be conducted by experts (under State supervision; Ministry of Environment-approved list of relevant experts: http://www.minzp.sk/postupy-ziadosti/ochrana-prirody-krajiny/registre-zoznamy/) to identify the location of endemic species; with forest management plans then adjusted accordingly to ensure these HCVs are not threatened (for example following HCV Guidelines; 6).</p> <p>OR</p> <p>Endemic species surveys led by forest owners need to be reviewed and agreed upon with relevant NGO groups (forest protection: LZ Vlk, oz Prales, WWF; habitats/species: Daphne; species: SOS/BirdLife Slovakia; Bat protection: WWF) and the regional responsible branch of the SNC SR; therefore, management should be adjusted to the requirements of the relevant species.</p> <p>AND/OR</p> <p>Critical Temporal sites control measures: Habitat surveys must be conducted by experts (under State supervision; Ministry of Environment-approved list of relevant experts: http://www.minzp.sk/postupy-ziadosti/ochrana-prirody-krajiny/registre-zoznamy/) who could elaborate what nature protection documentation is required to identify the location of the critical temporal sites. Forest management plans must then be adjusted accordingly to ensure these HCVs are not threatened (for example following HCV Guidelines; 6).</p> <p>OR</p> <p>Habitat surveys led by forest owners need to be reviewed and agreed upon with relevant NGO groups (forest protection: LZ Vlk, oz Prales, WWF; habitats/species: Daphne; species: SOS/BirdLife Slovakia; Bat protection: WWF) and the regional responsible branch of the SNC SR. Management should therefore be adjusted to the requirements of the relevant species.</p>	<p>ii) Work with experts (identified as per Annex C of the FSC-STD-40-005 V3-1 standard), environmental NGOs and/or use publicly available information to identify areas where forest management operations can be undertaken without threatening the HCVs</p> <p>iii) in areas where management operations threaten HCVs, establish and implement corrective or preventive actions to mitigate the threat, or, if threat not mitigatable, cease procurement from such areas.</p> <p>Control Measure B</p> <p>1. The organization provides evidence that material does not originate from protection sites with level 3-5 of protection according to national legislation and/or NATURA 2000 areas without approved Nature Management Plans</p> <p>Control Measure C</p> <p>1. Evidence of conformity to third party verification programs that covers in its scope the specified risk covered in this indicator. Evidence provided for meeting requirements for third party verification programs may be considered as a control measure.</p>	<p>owners/managers and from the relevant Nature Conservation Authorities and where necessary, carries out field verifications on sampled areas to</p> <p>i) complement the information received from these authorities, and identify with more precision areas where HCVs are threatened</p> <p>ii) Work with experts to identify areas where forest management operations can be undertaken without threatening the HCVs or</p> <p>iii) verify that the measures specified in step 3 are fulfilled.</p> <p>OR</p> <p>Consult with appropriate nature protection authority whether the forestry operations comply with conservation goals of protected areas and do not endanger RTE species living in the area</p>	<p>forest owners/managers and from the relevant Nature Conservation Authorities and where necessary, carries out field verifications on sampled areas to</p> <p>i) complement the information received from these authorities, and identify with more precision areas where HCVs are threatened</p> <p>ii) Work with experts to identify areas where forest management operations can be undertaken without threatening the HCVs or</p> <p>iii) verify that the measures specified in step 3 are fulfilled.</p>
3.3 HCV 3	<p>The main threats from forestry operations for all HCV 3 forests are linked to habitat removal, habitat fragmentation and overall insufficient level of protection of HCV 3 values. There is an insufficient level of protection for old-growth forests in Slovakia and forest management is threatening these ecosystems through habitat removal, fragmentation and/or facilitating the encroachment of invasive species, old-growth sites are considered Specified risk. The locations of RTE biotopes and rare yew ecosystems are often not known and/or there is a high likelihood of forest management threatening these HCV 3 values through habitat fragmentation or removal. Source of conflict between conservationists and foresters, revolving around inappropriate</p>	<p>Old-growth forests: Do not source any wood or NFTP products from any old-growth areas (with any level of protection) in Slovakia. Their locations can be identified here: http://en.pralesy.sk/lokality/</p> <p>For Unknown locations of RTE biotopes: Potential proxy occurrence of RTE biotopes are indicated in Annex III of Guidelines for HCVF (6) within a potential area of 64,000 ha (3.2% of forest area in Slovakia). In these proxy areas:</p> <p>RTE biotope surveys must be conducted by experts (under State supervision; Ministry of Environment-approved list of relevant experts: http://www.minzp.sk/postupy-ziadosti/ochrana-prirody-krajiny/registre-zoznamy/), who could elaborate what nature protection documentation is required to identify the location of RTE biotopes.</p> <p>OR</p> <p>RTE surveys led by forest owners need to be reviewed and agreed upon with relevant NGO groups (forest protection: LZ Vlk, oz Prales, WWF; habitats/species: Daphne; species: SOS/BirdLife Slovakia; Bat protection: WWF) and the regional responsible branch of the SNC SR.</p>	<p>In total, all forest RTE biotopes known to date cover approximately 63000 ha; and, with non-forest RTE biotopes occurring within forests, cover approximately 64,000 ha. Additionally, 10581 ha comprises of old-growth forests and natural forests with old-growth characteristics (122 sites that support old-growth forests and which exceed 20 ha in area), with a total area of about 8 849 ha; and 136 sites of old-growth forest remnants; these are sites of area 5–20 ha, with a total area of about 1 634 ha are also identified and marked on maps. Map of 'old- growth forests' are available at http://gis.nlcsk.org/lqis/</p> <p>RTE habitats are small, scattered and only a few are mapped. Information on some locations can be obtained from State Nature Conservancy or NGOs.</p> <p>For forests with natural occurrence of yew, there is no comprehensive map, but occurrence of yew is usually described in the Forest Management Plan or information on location can be obtained from State Nature Conservancy or NGOs.</p> <p>Control Measure A</p> <p>2. The organization can prove, with evidence that the material does not originate from areas with 'old growth' forests, RTE biotopes. If such evidence is available, no further control measures are required.</p> <p>Control Measure B</p>	<p>Identification of old growth forests on the maps. Identification of timber origin. Ban for purchasing of timber originating from these areas. Research on RTE biotopes based on the methodology of HSLT transfer to SLT. Collection of information on the level of risk imposed by harvesting operations for these biotopes. Where expected risk, site inspection performed. OR Consult with appropriate nature protection authority whether the forestry operations comply with conservation goals of protected areas and do not endanger RTE biotopes in the area. Appropriate measures taken in order to eliminate or mitigate the risk – stipulation of changes to the management on mentioned areas or stop of procurement.</p>	<p>Identification of old growth forests on the maps. GPS identification of timber origin. Ban for purchasing of timber originating from these areas. Research on RTE biotopes based on the methodology of HSLT transfer to SLT. Collection of information on the level of risk imposed by harvesting operations for these biotopes. Where proved risk, site inspection performed. Appropriate measures taken in order to eliminate or mitigate the risk – stipulation of changes to the management on mentioned areas or stop of procurement.</p>

	<p>management and protection level designations for protected sites. For example, salvage logging after natural disturbances in protected sites (including 5th level strict protection sites) is driven by the forestry sector with conservationists arguing this should not be done due to the ecological importance of fallen trees, snags, coarse woody debris etc.</p>	<p>Appropriately adapt forest management according to the recommendations from Annex VI of HCV Guidelines (1).</p> <p>AND/OR</p> <p>For known RTE biotope areas: Known RTE biotope locations could be identified and crossed with the follow information and maps: Reference documents (13) (14) and SNC SR data.</p> <p>In sites where RTE biotopes are known request evidence to confirm the designated protected site is managed according to the designated level of protection under Law no. 543/2003 Coll. on nature conservation and confirm the management of identified RTE biotope is in line with management measures recommended in the Annex VI of Guidelines for HCVF (6). Do not source yew (<i>Taxus baccata</i>) wood products because these ecosystems and trees are highly endangered and there is an insufficient level of protection; any harvesting of them is therefore unacceptable.</p> <p>OR</p> <p>2) Require from forest owners' evidence that tree inventories designed to locate yew trees were conducted OR obtain evidence that – in relation to identifying yew tree occurrence – formally recognized agreement has occurred among the relevant branch of the SNC SR and all interested groups (mainly environmental NGOs: oz Prales, WWF);</p> <p>AND</p> <p>3) Evidence that the forest management plan has been adjusted to protect occurrence(s) of the yew; ideally addressing threats by hunting and/or deer grazing; and the plan has been officially recognized by the relevant branch of the SNC SR.</p>	<ol style="list-style-type: none"> The organization collects and analyzes information/evidence from third parties by a complaints/dispute mechanism, stakeholder consultation and/or co-operation with a relevant body in order to identify areas with 'old growth' forests, RTE biotopes and/or natural occurrence of yew where the HCV are threatened by harvesting activities. Consultations with stakeholders shall be as per the requirements given in Annex B of the FSC-STD-40-005 V3-1 standard. The organization evaluates evidence received from the relevant forest owners/managers and from the relevant Nature Conservation Authorities and where necessary, carries out field verifications to <ol style="list-style-type: none"> complement the information received from these authorities, and identify with more precision areas where these HCVs are threatened Work with experts (identified as per Annex C of the FSC-STD-40-005 V3-1 standard), environmental NGOs and/or use publicly available information to identify areas where forest management operations can be undertaken without threatening the HCVs in areas where management operations threaten HCVs, establish and implement corrective or preventive actions to mitigate the threat, or, if threat not mitigatable, cease procurement from such areas. Precautionary approach - if stakeholder consultation suggests that current forest management may threaten HCV3 values the wood will not be sourced from such risk area until risk mitigation measures address concerns expressed by stakeholders. Mitigation measures include documents verification, field survey, and field verification specifically targeting the HCV3 values in question undertaken by experts qualified in nature protection, ecology, or similar subject (e.g. judicial appraiser in nature and landscape protection) and results shared with stakeholders to disconfirm suspicions. <p>Control Measure C</p> <ol style="list-style-type: none"> Establishment / adoption / adaptation of adequate measures in forest management plans or internal guidelines of FMEs ensuring that forestry operations are not threatening / are supporting HCV3 and execute on site verification to prove the measures are properly implemented. 		
<p>3.4 HCV 4</p>	<p>Protection forests that are mountain forests HCV 4.2 - Forests with significant importance for hydrological functions: protection forests according to Decree of Ministry of Agriculture no. 453/2006 CoL. on forest management, Article 2 sec. 1 char. (b), (c) and in part char. (a) (forest types of sets "a" and "c" (flood and high moisture/ wet locations and peatlands). Logging or salvage logging after natural disturbances can threaten the values and functions of these HCV 4.2 forests; however, since the changes in the forest management legislation (amendments to Law on Forest no. 326/2005 CoL from 2012, 2013 and 2014), professional forest managers (odborný lesný hospodár) have more responsibility including determining the way in which these forests are managed. Overall, professional forest managers are under pressure from forest owners to ensure the maximum profit from each forest management area; the level of logging in protection forests has therefore increased in the</p>	<p>Obtain official confirmation from the professional forest manager that the wood does not come from harvesting mountain forest below the tree line in the protected forests (Article 2 sec. (1) (b) according to MoA Decree 453/2006 CoL) or evidence that the wood in mountain forest below the tree line in the protected forests has been harvested using single tree selective harvesting or an uneven-age management harvesting regime.</p>	<p>Control Measure A</p> <ol style="list-style-type: none"> The organization collects and analyzes information/evidence from third parties by a complaints/dispute mechanism, stakeholder consultation and/or co-operation with a relevant body in order to identify "protective forests" ('mountain forests' below tree line) where the protective functions are threatened by harvesting activities. Consultations with stakeholders shall be as per the requirements given in Annex B of the FSC-STD-40-005 V3-1 standard. The organization evaluates evidence received from the relevant forest owners/managers and from the relevant Nature Conservation Authorities and where necessary, carries out field verifications to <ol style="list-style-type: none"> complement the information received from these authorities, and identify with more precision areas where these HCVs are threatened Work with experts (identified as per Annex C of the FSC-STD-40-005 V3-1 standard), environmental NGOs and/or use publicly available information to identify areas where forest management operations can be undertaken without threatening the HCVs in areas where management operations threaten HCVs, establish and implement corrective or preventive actions to mitigate the threat, or, if threat not mitigatable, cease procurement from such areas. <p>Control Measure B</p> <ol style="list-style-type: none"> Organization obtains evidence that material does not originate from areas categorized as protection forests comprising "mountain forests below tree line. 	<p>- The organization collects information/evidence from third parties by a complaints/dispute mechanism, stakeholder consultation and/or co-operation with a relevant body in order to identify "protective forests" ('mountain forests' below tree line – b category) where the protective functions are threatened by harvesting activities.</p> <p>- Organization evaluates evidence received from and where necessary, carries out an on-site evaluation to establish with more precision where management activities are threatening the protective functions.</p> <p>- Organization encourages FMU manager for forest management to be adapted in line with the desired management regime of ensuring the protective functions of these forests or stops procuring from the area.</p>	<p>- The organization collects information/evidence from third parties by a complaints/dispute mechanism, stakeholder consultation and/or co-operation with a relevant body in order to identify "protective forests" ('mountain forests' below tree line – b category) where the protective functions are threatened by harvesting activities.</p> <p>- Organization evaluates evidence received from and where necessary, carries out an on-site evaluation to establish with more precision where management activities are threatening the protective functions.</p> <p>- Organization encourages FMU manager for forest management to be adapted in line with the desired management regime of ensuring the protective functions of these forests or stops procuring from the area.</p>

	<p>last decade. Increased pressure to log 'Protection Forests' has also resulted from the growing demand of Slovakia's wood and paper processing industry. The most endangered forests that fall within this category are mountain forests that are located below the tree line.</p> <p>The main principles linked to responsible forest management of these mountain forests are: allowing for continuous regeneration with low impact, selective single tree harvesting; or an uneven-aged management harvesting regime. All other harvesting methods lead to the destruction of these fragile forests, including their soils and their hydric property. Other harvesting methods also have negative impacts on other forests surrounding these mountain forests, e.g. through wind throw, dieback, erosion and biodiversity loss. Due to the pressures outlined above, it is common that forest managers are logging at an increased rate in mountain forests which threatens HCV 4 values. This is leading to increase rate erosion of vulnerable and reduction of water quality and quantity.</p>		<p>Control Measure C</p> <ol style="list-style-type: none"> 1. If organization is not able to provide evidence that material does not originate from areas categorized as protection forests comprising "mountain forests below tree line, the organization checks for presence of protection forests with significant hydrological functions (as defined by applicable law - Decree of Ministry of Agriculture no. 453/2006 CoL. on forest management, Article 2 sec. 1 char. (b), (c) and in part char. (a) (forest types of sets "a" and "c" (flood and high moisture/ wet locations and peatlands)) within the supply area. 2. In case of presence of protection forests in supply regions, the organization undertakes consultation with relevant stakeholders (some of the relevant stakeholders may include Forest Research Institute, local forest authorities, State Nature Conservancy, NGOs, Slovak Hydro-Meteorological Institute, municipalities etc.) whether current management of these forests threatens their protective function. 3. In case stakeholder consultation suggests that current forest management may threaten HCV4.2 values the organization does not source unless: <ul style="list-style-type: none"> a) the field verification provided by experts prove the current forest management constitutes of selective single tree harvesting or uneven-aged management harvesting regime or other suitable silvicultural measures that allow continuous regeneration with low impact or b) Forest management is adapted to be in line with the desired management regime of ensuring the protective hydrological functions of these forests. 		
<p>3.6 HCV 6</p>	<p>'Primeval Beech Forests of the Carpathians and the Ancient Beech Forests of Germany' sites include four separate forest areas in the Eastern Carpathians–Poloniny in eastern Slovakia and are considered HCV 6 under the HCV guideline for Slovakia – containing globally significant natural sites. These forests are comprised of old-growth forests (also having HCV 3 values), some of which are designated with the fifth level of strict protection. Some of the other non-old-growth forests within the site have been designated with second and third level protection (Nature and Landscape Protection Act nb.543/2002 Coll and Forest Act) allowing for commercial logging; yet they fall under a UNESCO Heritage site which recognizes the forests HCV 6 outstanding nature values. These sites are threatened by habitat removal caused by commercial logging as some of the forest areas designated with second to fourth level protection according to the national legislation, which are insufficient to protect the biodiversity values of the forests. The HCV 6 values are under threat of being degraded and disturbed from forest management activities through habitat removal and fragmentation.</p> <p>'Primeval Beech Forests of the Carpathians and the Ancient Beech Forests of Germany'</p>	<p>Confirm no wood is being sourced or supplied from forest management companies operating in UNESCO World Heritage areas; namely sites known as 'Primeval Beech Forests of the Carpathians and the Ancient Beech Forests of Germany'.</p>	<p>Control Measure A</p> <ol style="list-style-type: none"> 1. Organization is able to provide confirmation (documentary evidence, GPS tracking system etc.) that no wood is being sourced or supplied from forest management organizations operating in UNESCO World Heritage areas; namely sites known as 'Primeval Beech Forests of the Carpathians and other regions of Europe. <p>NOTE: The total area covered is 18,000 ha as per nomination project submitted by Slovakia in 2007. Core area of 5700 ha is non-intervention area ((confirmed by ministry of environment) https://spravy.pravda.sk/domace/clanok/430455-pre-pralesy-dviha-unesco-varovne-prst/ http://www.unesco-slovakia.sk/sk/prirodne-pamiatky/karpatske-bukove-lesy/karpatske-bukove-lesy-na-slovensku</p> <p>Control Measure B</p> <p><i>For organizations that are sourcing from buffer zones of UNESCO World Heritage areas (excluding the 5700 ha of core area):</i></p> <ol style="list-style-type: none"> 1. Organization provides evidence that wood does not originate from core area of 5700 ha 2. Organization shall ensure that wood is traceable to the compartment level and; 3. Organization undertakes consultation with State Nature Conservation Authority, local environmental NGOs and other stakeholders and ensures that management activities do not threaten HCV 6 values through degradation, disturbance, habitat removal or fragmentation. 	<p>Identification of Primeval beech forests of the Carpathians on the maps. Identification of timber origin. Ban for purchasing of timber originating from core areas.</p>	<p>Identification of Primeval beech forests of the Carpathians on the maps. GPS identification of timber origin. Ban for purchasing of timber originating from core areas (5700ha).</p>

	should now be read as 'Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe' UNESCO World Heritage site				
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