



Frequently Asked Questions

# EUDR ALIGNED: FAQ ON FSC REQUIREMENTS

FAQ on normative changes proposed in FSC Regulatory Module, FSC Risk Assessments and system wide changes  
Updated: February 26, 2024



# INTRODUCTION

FSC is developing solutions to facilitate FSC certificate holders' efforts in demonstrating compliance with EU Regulations such as the European Union Deforestation Regulation, EUDR. One solution includes a modular approach to certification through the development of the FSC Regulatory Module—a comprehensive and adaptive extension to existing certification standards incorporating EUDR-specific criteria, definitions, documentation, and verification processes.

The FSC Regulatory Module is not a standalone but rather a voluntary standard to be used in addition to current FSC certification requirements for forest management, chain of custody and controlled wood and to be optimally used in conjunction with other parts of EUDR Aligned. The FSC Regulatory Module also includes accreditation requirements for certification bodies to verify conformance of certificate holders against the voluntary standard.

An integral part of EUDR Aligned and the implementation of the FSC Regulatory Module is the application of FSC Risk Assessments. The FSC Risk Assessments are based on <FSC-PRO-60-006b Risk Assessment Framework>, a revision process also in consultation.

In addition, FSC has developed a set of proposed normative changes in Advice Notes, which are applicable across the FSC system and based not solely on EUDR alignment but further alignment with <FSC-POL-01-007 Policy to Address Conversion> as well.

From 1 February 2024 – 1 March 2024, FSC is consulting these three complementary sets of normative requirements being developed to support EUDR alignment.

This set of FAQs is to support understanding of the draft set of requirements in consultation.

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# 1. Requirements Development Process

## 1.1 What process is being applied to develop these requirements?

Due to the EUDR legislation published in June 2023 with an 18-month timeframe for implementation, FSC has needed to act quickly. The development process is done in accordance with <FSC-PRO-01-001 Development and Revision of FSC Requirements>. The FSC Board of Directors decided to apply a 'hybrid' process to develop the requirements, comprising elements of an 'accelerated process' and elements of a 'major process'. As such, an internal technical working group comprising FSC staff and a representative from ASI have developed the draft requirements. The process includes a public consultation for 30 days to ensure that all stakeholders are informed and can provide feedback in a timely manner. The final decision on the draft requirements will be made by the FSC Board of Directors.

## 1.2 What are the requirements being consulted right now?

FSC has three related consultations open simultaneously between 1 Feb and 1 March 2024.

- 1) A consultation on [FSC Regulatory Module](#).
- 2) A consultation on three Advice Notes on changes that are proposed for all certificate holders.
- 3) A consultation on [FSC-PRO-60-006b Risk Assessment Framework Procedure](#) related to users of controlled wood and/or FSC Regulatory Module.

Stakeholders interested in the full scope of FSC alignment with the EUDR, including both system wide changes and the voluntary module, are invited to respond to all three consultations.

Stakeholders interested in changes proposed to general certification requirements, are invited to respond to consultations 2 and 3. The consultation is open on the [FSC Consultation Platform](#).

## 1.3 How will I know what happens with my feedback?

FSC will compile all feedback and develop a Consultation Report to review and indicate how feedback was addressed in the final draft. When this document is ready, all respondents will receive a copy of the Consultation Report. The Consultation Report will also be published on the applicable process pages here:

- [FSC Regulatory Module](#)
- [FSC Risk Assessment Framework](#)

## 1.4 What are the next steps after this consultation?

After compiling and analysing feedback, the final draft of the FSC Regulatory Module and system-wide changes will go to the [Policy and Standards Committee](#) and then FSC International Board of Directors to approve the requirements. The Policy and Standards Committee is the approval body for the <FSC PRO-60-006b FSC Risk Assessment Framework>.

## 1.5 When will the final requirements be published by?

All requirements under consultation are scheduled to be published on 1 July 2024 in order to offer certificate holders time to implement FSC requirements and tools as soon as possible. The requirements will be immediately effective for any certificate holders applying the FSC Regulatory Module, while the

systemic changes and changes to the FSC Risk Assessment Framework include an 18-month transition starting on 1 October 2024 to end 1 January 2026.

## 1.6 What will the transition dates be?

The transition timeline will differ between the FSC Regulatory Module and the Advice Notes that will be applicable across the FSC system.

The FSC Regulatory Module will become effective immediately on 1 July 2024 so that certificate holders applying the module can implement the requirements and tools immediately. There will be no transition timeline for the FSC Regulatory Module.

The Advice Notes applicable across the FSC system will become effective immediately on 1 July 2024 for those certificate holders that are applying the FSC Regulatory module.

For all other certificate holders, the Advice Notes will only become effective on 1 October 2024.

The transition end date for the system wide changes will be 1 April 2026, following the default 18-month timeline.

## 1.7 What other resources are available for me to better understand FSC's response to the EUDR alignment and these proposed normative requirements?

FSC has published a range of supplementary materials to understand the upcoming requirements and offerings. They are as follows:

- Interactive user journey webpage to understand the FSC Regulatory Module requirements based on user type at <https://www.fsc-eudr-journey.org/>
- [Infokit](#) to highlight certification requirements based on the FSC Regulatory Module
- Webinar [recording](#) and [slides](#)
- [Consultation video](#) to understand how the consultation works
- Brief on [FSC Risk Assessment Framework](#) changes
- Brief on [system-wide changes](#)
- Introductory video on [Meeting your EUDR requirements with FSC](#)
- Resources on overall on how FSC is aligning with EUDR on the dedicated EUDR Aligned webpage here: [www.fsc.org/eudr](http://www.fsc.org/eudr).

## 2. General system-wide certification requirements

### 2.1 I am not in the EU nor do I trade with the EU, are there changes relevant for me?

Yes, FSC has developed some Advice Notes that are relevant across the FSC system. They are as follows:

- ADVICE-20-007-xx Deforestation-free products from FSC-certified management units
- ADVICE-20-007-02 Certification of primary forests
- ADVICE-40-005-27 Use of FSC-STD-60-006b Risk Assessment Framework
- ADVICE-40-004-26 Inclusion of the Regulatory Claim

For forest management users: Closer alignment with the FSC Policy to Address Conversion by ensuring that all forest products sourced from FSC-certified management units are deforestation free. In addition, to clarify how degradation of primary forests is expressly not allowed in the FSC system.

All CoC users may need to adjust their systems slightly if they want to pass on the new FSC Regulatory claim.

To source controlled wood, users must shift to the new <FSC-PRO-60-006b Risk Assessment Framework> during upcoming annual review of risk assessments instead of using the risk assessment as outlined in <FSC-PRO-60-002a FSC National Risk Assessment Framework>, including new risk assessment terminologies to align with EUDR and be consistent throughout the FSC system.

Learn more about these changes [here](#).

### 2.2 How are these changes being included in the FSC normative framework?

These rules are provisionally stipulated by means of Advice Notes related to Forest Management and Chain of Custody Certification; including the sourcing of controlled material.

### 2.3 Why is FSC introducing new requirements for everyone because of EUDR?

The intentions of the EUDR and FSC are already closely aligned. With the publication of EUDR, FSC is furthering that alignment by accelerating changes already planned based on alignment with the Policy to Address Conversion. As closer align with the intention of the Policy to Address Conversion and the envisaged continued and enhanced alignment with global commitments to end deforestation, FSC is now putting in place strict rules that prevent any material stemming from conversion activities to end up in FSC certified products.



## 3. FSC Regulatory Module general

### 3.1 Is the FSC Regulatory Module mandatory? (updated)

No, the FSC Regulatory Module is a voluntary add-on module only. Once the certificate holder includes the Module in its certification scope, the requirements become mandatory. FSC has opted for a voluntary approach due to the different levels of impact depending on the company's activities or supply chain. To reduce the effort in demonstrating compliance with the EUDR in the EU supply chain, the certificate holder may request their suppliers to sell material with the Regulatory claim.

### 3.2 Is the FSC Regulatory Module for EUDR only or other regulations as well?

Currently, the FSC Regulatory Module only addresses the European Deforestation Regulation (EUDR). As further regulatory developments progress, FSC could utilize the module for further regulatory alignments.

### 3.3 Who is the FSC Regulatory Module relevant for?

This standard is for voluntary use by organizations applying for or holding FSC certification to extend their certification scope to align with the EUDR. It can be used in addition to all existing certification types and includes accreditation requirements for certification bodies. The FSC Regulatory Module standard focuses on wood and wood-based products.

### 3.4 Can I get certified to the FSC Regulatory Module only?

No, this is not a standalone set of requirements but rather an add-on module. Users must also either already be certified with FSC or selecting to include the FSC Regulatory Module as part of their certification process.

### 3.5 If I use the FSC Regulatory Module is it then required that all companies in our supply chain also follow this new standard? (new)

No, each company in the supply chain can choose to include the Regulatory Module in its certification scope. Nevertheless, there are benefits to having a 'fully verified supply chain', as all the necessary data will be available, lowering the demand, effort and risk while conducting the due diligence.

### 3.6 How can we distinguish between operator and trader in FSC Requirements?

The FSC Regulatory Module includes the definitions for "operator" and "trader" as well as icons to identify which requirement is relevant for which user-type based on the EUDR terminology of "operator", "trader", "SME," and "non-SME."

Note: In order to avoid confusion with the term 'trader' as defined in [<FSC-STD-40-004 Chain of Custody Certification>](#), FSC uses the term 'regulatory trader' in the standard when referring to a trader in the meaning of the EUDR.

### **3.7 When can I start getting certified to the FSC Regulatory Module?**

Upon publication, users of the FSC Regulatory Module can immediately use it as it will be immediately effective. FSC recommends indicating to your certification body early if you are interested in implementation the module so they can plan their time accordingly.

### **3.8 How can I get certified to the FSC Regulatory Module? (new)**

Certificate holders will need to request for a scope extension from their certification bodies to include the Regulatory Module and at minimum a desk-based audit will need to be done either during the next surveillance audit or as agreed with the certification body from 1 July 2024 (so not only from 1 January 2025). FSC recommends that certification bodies and certificate holders follow the development of the additional requirements to prepare accordingly and limit the time needed after 1 of July to prepare for inclusion of the Module and adapting to the system wide changes.

### **3.9 Will the FSC Regulatory Module guarantee compliance with EUDR?**

No, only competent authorities have the authority to verify compliance with the EUDR. FSC has included additional requirements that can support demonstrating this compliance by aligning FSC requirements with EUDR but the decision still rests solely on the competent authority. Certification bodies will check for conformity with FSC requirements, which can benefit users by having another third-party verifying conformity.

### **3.10 I'm at the end of the supply chain and we are only using FSC 100% materials and are responsible for compliance with the EUDR. What information will be provided in terms of geolocation and deforestation-free declarations, and who will provide it? (new)**

The requirements depend on the user-type (as defined by the EUDR, and reflected in the Regulatory Module), as well on the characteristics of the supply chain. Important to note that 'non-SME Trader' follow the same requirements as 'non-SME Operators'.

While conducting the due diligence, the organization shall obtain the information outlined in Section 4.9 (Due Diligence System – Obtaining information on input material) of the FSC Regulatory Module. The organization may engage with relevant suppliers and sub-suppliers in order to obtain clear and convincing evidence of conformity.

The Regulatory Module allows for some exemptions on conducting risk assessments (and risk mitigation measures) – see Clauses 4.8.2 and 4.8.3, and Section 4.13. For situations where it's not applicable, and for FSC 100% products, the organization will have a simplified risk assessment template provided by FSC.

### **3.11 Will all materials with a Regulatory claim need to be from FSC 100% or can they still be from other sources as long as the processes of sorting certified from uncertified material are carried out? (new)**

The Regulatory claim can be used associated to any FSC claim (except FSC Recycled - out of scope), and it may be used in all control systems (i.e., transfer, percentage, credit). Materials within the Regulatory Module scope have to be physically segregated from those not included (if applicable).

For non-certified material to be included in the Regulatory Module scope, certificate holders are to conform with <[FSC-STD-40-005 Requirements for Sourcing Controlled Wood](#)> plus the requirements in the Regulatory Module for chain of custody users.

### **3.12 If I get certified to the FSC Regulatory Module and use FSC Blockchain, what is the gap then to having a full due diligence system in compliance with EUDR? Will FSC provide templates for a due diligence systems? (new)**

The combination of the Regulatory Module with the FSC Blockchain (see [here](#) for more Blockchain information) is the stronger solution for the certificate holder. If suppliers/sub-suppliers also apply this combination of FSC tools it is considered the ideal situation to reduce burden and human error, and thus reducing the risk of circumvention of the EUDR, risk of origin and the risk of mixing. Companies can benefit from a detailed description on what to consider when assessing the risk by using FSC Risk Assessments in conformity with <FSC-PRO-60-006b Risk Assessment Framework> (in consultation).

### **3.13 How will the FSC Regulatory Module be applicable in supply chains that are not certified from end to end or in areas where a product moves from a certificate holder using the regulatory module to an uncertified company? (new)**

For sourcing FSC Mix or FSC Controlled Wood, the certificate holder will have to conduct the risk assessment, using the applicable FSC Risk Assessment (if available), when not available, FSC-PRO-60-006b applies. The due diligence system asks to engage with suppliers/sub-suppliers similar to how FSC currently outline requirements in <[FSC-STD-40-005 Requirements for Sourcing Controlled Wood](#)>.

## 4. Forest Management Regulatory Module

### 4.1 Do I need to make significant changes to my practices to conform with the FSC Regulatory Module?

The FSC Regulatory Module has been developed to minimize the effort for forest management certificate holders building on the groundwork already done to achieve FSC Forest Management Certification.

The EUDR requires that due diligence is exercised to demonstrate that the products are deforestation-free and have been produced according to the relevant legislation of the country of production.

While FSC requirements, including the new ADVICE-20-007-XX Deforestation-free products from FSC certified management units, cover these aspects and there are not additional changes to forest practices required, EUDR (and therefore the module) requires activities, such as collection of information, risk assessments and risk mitigation measures, issuance of a due diligence statement, maintenance of records, etc.

The module supports forest management certificate holders to demonstrate that several of these aspects are covered by FSC certification, while minor efforts are still needed.

### 4.2 Do forest managers need to use the FSC Risk Assessments?

Yes, if the management unit is not in a country or part of a country classified as 'low risk' in accordance with the EUDR three-tier risk system, the FSC Risk Assessment - if available for the geographical area where the management unit is located - is required to be used as the first step or reference to assess risk.

FSC will provide a template:

- To support certificate holders to assess the risk if no FSC Risk Assessment exists, and
- To demonstrate that FSC Forest Management Certification is a solution to achieve no or negligible risk, if a non-negligible risk has been identified in the FSC Risk Assessment or the company risk assessment.

### 4.3 When will this Risk Assessment template for forest managers be available?

The template will be available together with the publication of the FSC Regulatory Module, on 1 July 2024.

### 4.4 Are there different requirements for Controlled Forest Management under the Regulatory Module?

Certificate holders applying the Controlled Forest Management standard will have to conform with the same requirements as forest management certificate holders.

### 4.5 What about forest management groups?

The FSC Regulatory Module includes supplementary requirements regarding how the standard is implemented in a group set up. This includes, for example, how responsibilities are divided or how the

internal monitoring system has to be adapted. All group members are obliged demonstrated conformity with the FSC Regulatory Module, if this is to be included in the scope.

#### **4.6 Isn't conformity to an FSC Forest Stewardship Standard for a certified area enough proof for compliance with EUDR? Why is a risk assessment required for an FSC forest management certified area? (new)**

This would argue for a green lane for forest management certification which is not acceptable for EU authorities - formal steps of information gathering, risk assessment and mitigation are required in all cases of non-negligible risk. However, FSC considers demonstrated conformity to a national Forest Stewardship Standard as a way to achieve negligible risks. Should this not be the case, it may be a risk mitigation measure that would contribute to in any non-negligible risks being effectively mitigated.

#### **4.7 How does FSC define “deforestation-free”? (new)**

The term “deforestation-free” is not explicitly defined in the FSC system. FSC definitions of conversion and degradation together with Interpretations #01, #02, #04 and #05 (please see Regulatory Module) and Advice Notes ADVICE-20-007-XX *Deforestation-free products from FSC certified management units* and ADVICE-20-007-02 *Certification of primary forests* provide the clarification and normative connection to the EUDR definition for full alignment.

## 5. Chain of Custody Regulatory Module

### 5.1 What are the biggest changes for chain of custody users?

Following the provisions of the EUDR, FSC's Regulatory Module includes specific requirements depending on your organization's position in the supply chain. (i.e., Operators and Traders). One new aspect that was introduced is the development and implementation of a Due Diligence System (DDS) that includes at a minimum the collection of information, a risk assessment, and risk mitigation processes. FSC is also introducing a new output claim (i.e., 'Regulatory') for products sold through the FSC Regulatory Module. As a result, certificate holders that are not using the FSC Regulatory Module can voluntarily decide to add the Regulatory claim to their scope.

### 5.2 If I am not implementing the FSC Regulatory Module are there still changes I need to make?

FSC is introducing a systemic change so that non-users of the FSC Regulatory Module have clear requirements for the purpose of controlling the Regulatory output claim. The organization may choose to use the Regulatory claim in sales documentation (followed by the FSC claim), provided that the provisions in the new advice note are met.

### 5.3 Do I need to update my due diligence system every time I collect more information?

The purpose of a due diligence system (DDS) is to assess and mitigate the risk of sourcing material from unacceptable sources. At a minimum the organization has to annually review (and revise if necessary) and address changes that may affect the relevance, effectiveness or adequacy of the DDS. As long as those changes do not occur (e.g., in supply area, type of products, species), the organization is not required to change its DDS every time it collects information.

### 5.4 What is my responsibility around information from my suppliers?

You are always responsible for the plausibility and accuracy of the information collected no matter where your supplier is based, inside or outside the European Union (EU). EUDR is only applicable to organizations that operate or trade in the EU, so if your supplier is outside of the EU they are not required to be compliant with the EUDR. Hence, a higher level of evaluation may be needed to determine their products' compliance.

### 5.5 What is the relationship between EUDR's Harmonized Codes and FSC's product types?

The Harmonized System (HS) codes are a standardized numerical method of classifying traded products. FSC product types are a general description of outputs based on the classification system specified in FSC-STD-40-004a. FSC standards apply to all products within the forest matrix, while the EUDR requires the reporting of specific HS codes, detailed in EUDR Annex I.

This means that not every FSC-certified organization will fall under the provisions of the EUDR, but for those who trade in products that are listed in Annex I, compliance with the EUDR will be required. To bridge the gap between HS codes and FSC Product Classification, FSC is working on a guidance tool so that organizations can match both classifications.

## **5.6 Does a due diligence risk assessment happen annually or per shipment? If annually and I am creating a new product, how can I include my annual volume summary as I might not know how much I'll buy? (new)**

From the [EUDR FAQ](#):

(11) Should due diligence be repeated for products from the same land?

The geolocation information obligation to be provided in the due diligence statements, via the Information System, is connected to each relevant product. Operators (or traders that are not SMEs) will thus need to indicate this information each time they intend to place, make available on the market or export a relevant product. The due diligence must be repeated (i.e. updated) for each relevant product, including providing the geolocation coordinates accordingly.

## **5.7 If someone has FSC Mix claim rather than FSC 100% and they are sourcing from low risk countries, do they follow a simplified due diligence or a more detailed Risk Assessment? (new)**

Simplified due diligence (as described in Section 4.13 of the Regulatory Module) can be applied to any FSC claim (except FSC Recycled – out of scope), provided the conditions in the that section are met. In addition to the EUDR three-tier risk system, the certificate holder needs to consider the risk designation from the applicable FSC Risk Assessment. Risk still needs to be mitigated if any non-negligible risk or any information on substantiated concerns is found. Nonetheless, the certificate holder has to always assess the risk of mixing (Clause 4.10.7) and, where applicable, implement proportionate risk mitigation measures.

## **5.8 Which control system can be used with the Regulatory Module? (new)**

The Regulatory Module can be used for all control systems (transfer, credit, percentage). However, regardless of the control system used, a product group shall not have non-eligible inputs (non-controlled under the provisions of the Regulatory Module).

## **5.9 How can I mitigate the risk of mixing? (new)**

The assessment of the risk of mixing aims to avoid mixing with materials of unknown origin or produced in areas where deforestation or forest degradation has occurred or is occurring. The risk of mixing includes the stages of transport, processing and storage. It is dependent on the supply chain itself, but shall include, at minimum, the stage of processing of the products and the complexity of the supply chain (e.g., the number of tiers of suppliers, geographies in which suppliers are located, size and type of supplier's operations).

### **5.10 As an FSC Chain of Custody certificate holder we make products both with and without FSC Mix material. To what extent can we use the FSC Regulatory Module to support our compliance with the EUDR if not all products are a part of the FSC Chain of Custody? (new)**

Within the certification, the organization may choose which product groups are included in the scope of the Regulatory Module. Between FSC-certified and non-FSC-certified products, the latter ones are outside of the FSC scope (and thus, outside the scope of the Regulatory Module), and are not be assessed by the certification body (nor can be promoted as being in conformity with the FSC requirements). In any case, the FSC Regulatory Module is a public tool that companies can use for their reference.

### **5.11 How will the non-certified part of FSC Mix products be assessed for conformity? Will FSC Mix be able to meet the requirements of EUDR or will additional documentation be required? (new)**

For sourcing FSC Mix or FSC Controlled Wood material/products, the certificate holder will have to conduct the risk assessment (and applicable risk mitigation measures), using the applicable FSC Risk Assessment based on <FSC-PRO-60-006b FSC Risk Assessment> (if available). When not available, the certificate holder will have to conduct its own risk assessment, according to the requirements of the referred procedure. Together with the system-wide changes, the certificate holder will be able to use the FSC system as a tool for compliance.

### **5.12 What is the actual difference between ‘regulatory traders’ and ‘traders’? Do regulatory traders need to meet the same requirements as the rest of traders? (new)**

FSC uses the term ‘regulatory trader’ in the FSC Regulatory Module when referring to a trader in the meaning of the EUDR. It aims to avoid confusion with the already existing term ‘trader’ within the FSC system, which means ‘not conducting any transformation of a product’.



## 6. FSC Risk Assessments

### 6.1 What are the major changes proposed to process requirements for Risk Assessments?

To align with EUDR, risk assessments are now applicable to Forest Management and Chain of Custody (including Controlled Wood). In addition, the following are also key process-related changes:

- a) The process requirements have been streamlined considering the need for ensuring that the requirements can be followed by other organizations participating in the Risk Information Alliance (further information under the following link: <https://fsc.org/en/newscentre/standards/fscs-new-approach-for-risk-assessments-in-forests>).
- b) Establishment of mitigation measures where 'non-negligible risks' are identified.
- c) Annual review of risk assessments, in addition to a complete review and eventual revision every 5 years.

For further information on key process related changes, please read the crosswalk document shared in consultation together with the second draft of <FSC-PRO-60-006b V2-0 Risk Assessment Framework>: [https://connect.fsc.org/sites/default/files/2024-01/FSC-PRO-60-006b%20V2-0%20D2-0\\_crosswalk.pdf](https://connect.fsc.org/sites/default/files/2024-01/FSC-PRO-60-006b%20V2-0%20D2-0_crosswalk.pdf).

### 6.2 What are the major changes proposed to content requirements for Risk Assessments?

The main changes proposed to content requirements can be summarized under the following aspects:

- a) **A common set of indicators:** FSC Risk Assessments now include 76 indicators instead of 32 indicators. Although there is an increase in the number of indicators, the topics covered are mostly the same (e.g. legality assessment, human and labour rights, HCVs, conversion, GMO, etc.). The requirements have structurally changed through how the proposed indicators are written.
- b) **Assessment of conversion** is now aligned with the intention of <[FSC-POL-01-007 Policy to Address Conversion](#)> as well as EUDR, including adopting the precautionary approach to assess the risk of conversion. Therefore, a 'non-negligible' risk designation for conversion is applied as a default. Risk assessments developed by a chamber-balanced working group may change the risk designation through data analysis demonstrating that conversion has not taken place in the area under assessment since 31 December 2020.
- c) **Assessment of forest degradation:** A new indicator introduces the assessment of forest degradation: *There is no forest degradation since 31 December 2020*, including a numerical 'non-negligible' risk threshold to assess this indicator.
- d) **Intact Forest Landscape boundaries** now updated by using other forms of best available information (in addition to the Global Forest Watch maps), such as historical harvesting documentation, existing Forest Stewardship Standard (FSS) frameworks, maps and external data provided by independent organizations, scientists and experts.

For further information on key content related changes, please read the crosswalk document shared in consultation together with the second draft of <FSC-PRO-60-006b V2-0 Risk Assessment Framework >: [https://connect.fsc.org/sites/default/files/2024-01/FSC-PRO-60-006b%20V2-0%20D2-0\\_crosswalk.pdf](https://connect.fsc.org/sites/default/files/2024-01/FSC-PRO-60-006b%20V2-0%20D2-0_crosswalk.pdf).

### **6.3 Do these Risk Assessments assess risk at country level or product level?**

Risk Assessments can limit the scope of assessment to a country, a region that is part of a country, or a region that covers more than one country, as well as to specific products (e.g. timber, rubber, specific NTFPs, and more) and to some of the indicators that are part of <FSC-PRO-06-006b Risk Assessment Framework>.

### **6.4 How do the revised Risk Assessments incorporate the protection of Indigenous Peoples' rights?**

Indigenous Peoples rights are covered by the risk assessment indicators, including assessment of legal compliance, as well as those rights covered by ILO provisions and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), including Free, Prior and Informed Consent (FPIC).

### **6.5 Who can use FSC Risk Assessments – do I need to be certified?**

With the revised <FSC-PRO-06-006b Risk Assessment Framework> anybody can use the FSC Risk Assessments; there is no requirement for certification.

That is the goal from the changes proposed by FSC - as long as the Regulatory Module is being used. This is applicable to all FSC claims (with exception of FSC Recycled - out of scope). Please note that FSC refers to conformity to the requirements, as a supporting tool for company's compliance with EUDR (no certification system can be considered a green lane).

### **6.6 When will the FSC Risk Assessments be available? (updated)**

The <FSC-PRO-60-006b Risk Assessment Framework> will be published on 1 July 2024. FSC is working to have 20 prioritized Risk Assessments revised and available by 1 March 2025.

### **6.7 Which countries will be prioritized? (updated)**

FSC has identified 20 priority countries. They are as follows (listed alphabetically): Austria, Brazil, Canada, Chile, China, Estonia, Finland, France, Germany, Indonesia, Latvia, Poland, Portugal, Romania, Spain, Sweden, Türkiye, United Kingdom, Ukraine and USA. FSC will publish related announcements on the process page [here](#).

### **6.8 After the first/prioritized Risk Assessments have been developed, how can national chamber balanced processes influence the development of Risk Assessments in the long run? (new)**

A chamber-balanced process to develop/revise risk assessments will always be a possibility. In practice, a centralized based risk assessment will be replaced by the chamber balanced based risk assessment, once approved by FSC.

## **6.9 Is there anything I can do to support the development of a Risk Assessment in my country?**

Stakeholders are encouraged to provide inputs during consultation for the development or revision of a Risk Assessment. In addition, the Risk Assessments will be reviewed and updated annually to ensure that the applicable legislation, risk designations and mitigation measures are up-to-date. The annual review will be based on expert and stakeholder inputs. Stakeholders and experts will have the possibility to continuously provide inputs to the Risk Assessment and share information through an online platform provided by FSC.

Furthermore, FSC will be seeking to identify experts to support the revision of Risk Assessments in prioritized countries.

## **6.10 How can I conduct an EUDR-aligned risk assessment with FSC while waiting for the new Risk Assessments? (new)**

If there is no updated FSC Risk Assessment in the country/region, companies aiming to conform with the Regulatory module will have to develop an extended company risk assessments following the requirements under FSC-PRO-60-006b, including a template provided by FSC.

## **6.11 Where can I find the current list of country risk assessment and level of risk for each?**

You can access to the FSC Risk Assessment Platform which contains the risk designation per indicator of each of the current 60 Controlled Wood Risk Assessments under the following link:  
<https://connect.fsc.org/chain-custody-certification/fsc-risk-assessment-platform>

The existing Framework to develop them is here: <https://connect.fsc.org/document-centre/documents/resource/377>

You can also search for the PDF document of each of the existing Controlled Wood Risk Assessments in the Document Centre, under the following link: <https://connect.fsc.org/document-centre>

Nevertheless, the results of the revised FSC risk assessments will only be available for the first 20 prioritized countries by end of March 2025.

## **6.12 Will FSC Risk Assessments support bringing FSC Mix into compliance with EUDR? (new)**

That is the goal of the proposed changes by FSC - as long as the Regulatory Module is being used. This is applicable to all FSC claims (with exception of FSC Recycled - out of scope). Please note that FSC refers to conformity to the requirements, as a supporting tool for company's compliance with EUDR as no certification system can be considered a green lane.

## **6.12 Will existing National Risk Assessments from FSC-PRO-60-002a be eligible to use for the FSC Regulatory Module?**

No, only risk assessments developed in accordance with <FSC-PRO-60-006b Risk Assessment Framework> are to be used within the FSC Regulatory Module. Please see Part 4 'Forest Management Regulatory Module' regarding the template provided by FSC to be used by certificate holders to assess the risk if no FSC Risk Assessment exists.

### **6.13 What's the relationship between the FSC Risk Assessments and the "Risk Information Alliance"?**

FSC is aiming for an alliance between partners facing similar challenges around developing risk assessments through the Risk Information Alliance. This Risk Information Alliance will foster global sustainability leadership by collaborating with other sustainability leaders with a focus on developing a single, standardized Risk Assessment framework that will benefit both certified and non-certified companies. The Risk Information Alliance aims to streamline the development of requirements and decision-making processes. However, <FSC-PRO-60-006b Risk Assessment Framework> still allows the development of risk assessments through chamber-balanced working groups; thus building flexibility and a means of fast-tracking risk assessment development with new avenues.

### **6.14 How do FSC Risk Assessments go beyond EUDR? (new)**

FSC includes environmental and social values through indicators in our current Controlled Wood Risk Assessment Framework which comprise key requirements for FSC system. For example, the assessment of High Conservation Values, child labour including related rights as specified in ILO Fundamental Principles and Rights at Work, among others.

## 7. Regulatory Module Accreditation Requirements

### 7.1 What is the role of certification bodies?

Certification bodies are verifying certificate holders' conformity to the certification requirements of the FSC Regulatory Module.

### 7.2 How will these requirements be phased in?

The application of the FSC Regulatory Module will require an extension of the certification scope of certificate holders. This means that certificate holders will need to make a request for scope extension to their certification body. The draft requirements indicate that at minimum certification bodies will need to conduct a desk check of the certificate holders' documentation (e.g. procedures) before the scope extension is made.

### 7.3 Will certification bodies need to seek additional accreditation to audit against the Regulatory Module? (new)

Certification bodies will need to signal to ASI once they are ready from their side to offer verification against the Regulatory Module. ASI will then do a desk audit or combine the audit with a head office assessment in case the timing coincides.

### 7.4 Will there be training for certification bodies for the FSC Regulatory Module?

FSC is not planning to provide formal training to certification bodies on the FSC Regulatory Module but will be supporting the introduction and alignment process with FSC and between certification bodies by organizing workshops in Q4 2024 and in the following year. The FSC Regulatory Module accreditation requirements will be similar to the existing accreditation requirements and will not require key new competences from the certification bodies.

### 7.5 Can auditors qualified for schemes other than FSC audit the FSC Regulatory Module?

No, this will not be possible as the FSC Regulatory Module is not designed to ensure independent certification and accreditation against the module but works in conjunction with regular FSC certification and accreditation. Auditors will need to demonstrate the qualifications and trainings as required by <FSC-STD-20-001 General requirements for FSC accredited certification bodies> and <FSC-PRO-20-004 General requirements for an FSC Training Programme>, that are designed specifically for FSC.



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