FSC-STD-40-005 V3-1 - Frequently Asked Questions (FAQs)

Last update: **16th April 2018**

Item #	Concerned Issues	CAB questions	PSU answers
1	DDS	Can an organization apply its own DDS to timberlands/its own forest management units or does it simply mean a third-party consultant must develop the DDS for the organization that they own their own forest land? Can an organization apply DDS to forest that it owns or manages, to source controlled wood from them?	In principle, DDS may be applied if the forest is located within the area covered by FSC risk assessment. However, clause 1.4 of FSC-STD-40-005 V3-1 states, "The organization shall not apply its DDS to forest resources that it or any affiliated organization owns or manages, unless an FSC risk assessment for all five controlled wood categories has been scheduled for an area covering the supply units by 31 December 2017." so, if an FSC Risk assessment had been scheduled by 31st December 2017, the organization can apply its own risk assessment, else, it needs to get that area certified as per FSC-STD-30-010 V 2-0 to use that material originating from those forest management units as controlled material.
2	DDS	When outsourcing DDS to external parties, such as consultants, does the organization need to have outsourcing agreement as specified by FSC-STD-40-004 V-3 Clause 12?	Outsourcing DDS to external parties is an independent service transaction between the organization and the external party/consultant beyond the scope of the FSC requirements. As such, it beyond the scope of the FSC-STD-40-004 V3-0, as such, it does not require an outsourcing agreement as per Clause 12.
3	DDS	Will the DDS need to be revised if the suppliers change the management and inexplicitly change the company, maintaining the location?	Yes, if the management change implies a new assessment of risk or risk mitigation. This revision could happen as an immediate revision or as part of the annual internal audit, depending on the effect this management change may have.
4	DDS	Do transporters really need to be included in the list of supplier under the requirements of DDS? Given that harvesters and transporters usually change during the seasons?	The standard requires that all suppliers and sub-suppliers shall be included in the DDS. This is to trace material back to its origin, including transport. However, individual transporters, who are not suppliers, do not usually have to be included and information confirming transport will suffice.
5	DDS	We have to make a new analysis when using wood from a new area. Do we have to contact our third party audit company to validate the new analysis?	Depends on the new area from which the organization is starting the sourcing from. Clause 1.6 of FSC-STD-40-005 V3-1 requires the organization to review and revise its DDS whenever changes occur that affect the relevance, effectiveness or adequacy of the DDS. Similarly, Clause 6.2 of FSC-STD-20-011 V4-0 requires the certification body to design and implement a system for evaluating the relevance, effectiveness and adequacy of the DDS, according to the scope and scale of the organizations' operations. If the new sourcing area is from a different supply unit within the original supply area, the organization needs to update its DDS and keep its certification body informed. There is no requirement for the certification body to validate the information immediately, which can be done at the next surveillance audit. However, if the sourcing is from a new supply area, the certification body needs to evaluate the DDS to see whether the DDS has been updated to reflect the new supply area, verify the new risk designations and if risk is present, whether adequate control measures to mitigate the risks have been implemented.
6	DDS	Can a certification body develop control measures for an organization, if an FSC risk assessment is present, but there are no mandatory control measures included in it, or these control measures are insufficient to effectively mitigate risk?	The organization implementing the standard can outsource the development of all or part of its due diligence system (including the development of control measures), to another organization, such as a certification body, but not the certification body that audits the organization's conformity to the requirements of the standard.
7	DDS	Does field verification for DDS occur every year?	No. The standard requires organizations to undertake a review and if required, revision of its DDS, atleast annually, and whenever changes occur that affect the relevance, effectiveness or adequacy of the DDS. This review could include stakeholder consultations, field verifications and document review, all of which may be included as part of the internal audit of DDS. So, depending on the requirements of the review, the field verification may or may not be required annually.
8	Origin of Material	Do an organization always need to trace the materials to the supply unit to proof the origin of the materials? To what level the organization shall need to trace the materials in the supply chain to meet the requirements of the "origin of the material"?	No, the organization do not need to always know the exact location where the tree was cut (supply unit, 'FMU' in version 2-1 of the standard). E.g., if a risk assessment was done at a scale of the country (for each of controlled wood categories) – it would be enough to prove that the material originates from this country (not particular FMU in this country). If a risk assessment was done on finer scale, e.g. province within a country, it will be enough to prove that the material originates from this province (not particular FMU in this province). If a risk assessment was done at a scale of "FMU", then origin of the material needs to be proven for "FMU". The standard requires to trace the materials to the level of homogenous risk designation. For example, if the whole country is in a homogenous risk, the organization will only have to trace materials to the country level but not specific supply unit. However, please note that where specified and unspecified risk is designated, there may be control measures that need to be implemented in the supply unit(s) of origin. In such cases, information on the supply unit of origin will be needed.
9	Origin of Material	The standard allows supplier declarations as proof of origin for co-products (if their content is plausible). On the other hand, the standard says that ALL suppliers and sub-suppliers need to be included in the DDS. Therefore, many auditors expect also the knowledge about the sub-suppliers in case of co-products. Are they right?	No, this is a misinterpretation of the standard requirements. Clause 2.5 of FSC-STD-40-005 V3-1 clearly states that for co-product inputs, the organization needs to either document the origin as per Clause 2.2, or have in place a legally effective and enforceable agreement with the supplier of the co-product, which includes a statement on the origin. The standard however, does require the certificate holder to document and maintain the names and addresses of its suppliers (not sub-suppliers).

10	Origin of Material	You say: "If you know that the material comes from ..." To KNOW it is not sufficient. You have to PROVE it. So how can you PROVE an origin on the level of a region? Which documents with which content can serve for that?	FSC-STD-40-005 V3-1 Clause 2 Box 2 provides details of documenting origin. It states, “Relevant documentation may include, but is not limited to, legally required transport documents and proof of purchase from the supply unit of origin (see below), and the relevant invoicing system used in the area(s) of origin. Evidence of origin may be verified by the organization at the supplier’s site, and/or off site, using copies of relevant documentation. Information on the supply unit of origin is not always required for evidence of origin, but will be needed if a control measure (e.g. field verification) is relevant on that scale.”
11	Origin of Material	Can suppliers declaration alone be considered sufficient proof of origin?	No, supplier declaration alone will not be considered proof of origin.
12	Purchase of FSC Controlled Wood	If a company using controlled wood purchased from other organizations, they do not need to implement controlled wood standard?	Correct. Organizations purchase materials that already has the FSC Controlled Wood claim do not have to implement the standard FSC-STD-40-005 V3-1. The transaction/trading/purchase/sale of the material with an FSC claim is covered by FSC chain of custody certification (FSC-STD-40-004) instead. Organization should use FSC-STD-40-005 V3-1 for sourcing material without FSC claim that they would like to use as controlled wood.
13	Purchase of FSC Controlled Wood	If our company only uses material that is purchased with the FSC Controlled Wood claim, does this new version of the standard affect us? Do we still need to implement this standard and implement a DDS?	Material with an FSC Controlled Wood claim will have already been subject to the DDS of another organization that will have implemented FSC-STD-40-005 V3-1, or it will have been sourced from a forest certified according to the controlled wood forest management standard (FSC-STD-30-010). If you continue to only source material that carries the FSC Controlled Wood claim from organizations with FSC chain of custody certification, you do not have to implement V3-1 of the standard. This is different to V2-1 of the standard, which is implemented by any organization handling controlled wood.
14	Risk Assessment	What kind of risk assessment should an organization conduct under the requirements of FSC-STD-40-005 V3-1? What's the difference between NRA, CNRA, Simplied Risk Assessment and Extended Risk Assessment?	If there is an FSC risk assessment approved (NRA or CNRA), an organization shall use the approved FSC risk assessment. In case there is no approved FSC Risk Assessment, the organization can undertake a coompany risk assessment (CRA), provided the supply area was scheduled for an FSC Risk Assessment by 31st December 2017. In case no FSC Risk assessments are approved or scheduled, the organization needs to use an extended company risk assessment (ECRA)
15	Risk Assessment	If there is no FSC risk assessment by the end of 2017, can organizations still use their own risk assessment?	Yes, as long as an FSC Risk assessment was scheduled for that country by December 2017, the organizations in those countries can use their own risk assessments.
16	Risk Assessment	Where I can find the most updated approved National Risk Assessment (NRA)?	Organization can find the most updated draft and approved risk assessments on the FSC Risk Assessment Database webpage, at https://ic.fsc.org/en/document-center
17	Risk Assessment	When will organizations no longer be able to use old NRAs?	NRAs approved according to FSC-PRO-60-002 V2-0 (‘old NRAs’) remain valid until 31 December 2018. If the NRA is not revised according to FSC-PRO-60002 V3-0 by 31 December 2018, areas covered become unassessed areas.
18	Risk Assessment	Can an organization conducts company risk assessments while waiting for the delivery of the NRA or CNRA. Can the company risk assessment be used regardless of the expected results of NRA or CNRA, even when "specified risk" might be expected for all five categories?	Company risk assessments can be used in countries where FSC risk assessment development by FSC is scheduled, regardless of what the expected results of the risk assessments may be.
19	Risk Assessment	If an organization is using a Company risk assessment, but then a CNRA is approved, does the organization have to begin using it within six months of the approval of the CNRA, or can they continue using it until the end of 2018?	Organizations must update their due diligence system to use approved FSC risk assessment within six months of their formal approval.
20	Risk Assessment	If a product contains material from a number of countries, which country should the risk assessment should be based on?	If material originates from different countries, risk assessments will have to be used/developed for all relevant countries.
21	Risk Assessment	Clause 3.2 of the standard says that organizations must use the approved FSC risk assessment within six month of its approval. Does this mean the organizations need to review/updated its risk assessment every 6 months? and the organization need to be audited by their certification body within that six months period to demonstrate that they have indeed started using the approved FSC risk assessment?	The six months requirement relates to the use of FSC risk assessments within six months of their approval. If an organization is sourcing controlled wood from a country that does not have a risk assessment (i.e. using the organization’s own risk assessment), but then a FSC risk assessment is approved on e.g. 1 January 2017, the organization must update its due diligence system to use that approved FSC risk assessment by the end of June 2017. It does not mean that the risk assessment must be reviewed/updated every six (6) months. The organization does not need to be audited by their certification body by the end of the six (6) months period, however, the organization must update its DDS against the approved risk assessment.The next audit it will need to check that the relevant risk assessment was being used by the appropriate date.
22	Risk Assessment	How can I know when will be the NRA or CNRA available for a specific country?	The current timetable for NRA and CNRA development and an overview of published and unpublished risk designations can be found at the following location on the FSC website: https://ic.fsc.org/en/what-is-fsc-certification/controlled-wood/risk-assessments
23	Risk Assessment	If part of the FSC risk assessments are approved (not all categories), can an organization start using it or should the organization wait till all categories of the FSC risk assessment has been approved before using it?	If a national risk assessment process is taking place, companies will be able to use part of the assessment that was agreed through national consensus, even when only some, but not all, categories of the national risk assessment are nationally concluded.
24	Risk Mitigation	Does an organization need to do any mitigation if an NRA claims specified risk but stakeholder consultation in the supply basin indicates confirmation of low risk?	Further mitigation would not be needed if all stakeholder consultation requirements are met and the organisation confirms that for this particular supply area and supply chain the risk is not present. Balanced and objective feedback from different groups of relevant stakeholders, all confirming nonexisting risk, is essential though.

25	Risk Mitigation	If an NRA states low risk for all HCV categories, are risk mitigation processes relevant?	There are two types of risk, risk of origin (which the NRA deals with) and risk of mixing. If risk of origin is low, no mitigation action is needed for the is type of risk. However, the organization would still need to verift if the material sourced from low risk areas has been mixed in the supply chain. If this is not the case either, no mitigation action at all is needed. However, if the organization identified specific or unspecific risk related to origin and/or risk related to mixing with non-eligible inputs in the supply chain, the organization shall implement adequate control measures to mitigate the risk.
26	Stakeholder Consultation	If both NRA and CNRA are not available, does the Certification Body need to conduct stakeholder consultation for low risk designation country?	If a CNRA or NRA is not available, the CB needs to a conduct stakeholder consultation regardless of risk designation for the initial evaluation (the first audit against FSC-STD-40-005 V3-0) and every subsequent re-evaluation (every 5th year). However, the consultation is NOT required when the FSC risk assessment provides low risk.
27	Stakeholder Consultation	Does a CB have to perform a stakeholder consultation for an organization sourcing material from an area classified as low risk through an FSC-NRA or FSC-CNRA?	No, a stakeholder consultation conducted by the CB is not mandatory.
28	Suppliers / Sub-suppliers	Can an organization do sampling in providing the information of suppliers and sub-suppliers in their supply chain of material being source?	The standard does not require specific sampling methods, nor does it rule them out. It is the organization's responsibility to ensure any sampling done is adequate, and it is the CB and ASI's mandate to evaluate this. Please note that sampling at the supply unit level is different than sampling in the supply chain, and may require different measures.
29	Suppliers / Sub-suppliers	If the organization makes a DDS to a supplier in a risk area and is asking for sub-supplier info/invoices and the supplier is not willing to inform the organization, should you stop buying from the supplier? It is normal that some information is not for sharing?	The standard requires the information to be available for the organization. Confidentiality is respected, however, if it prevents the standard requirements to be met, indeed such a supplier would have to be excluded.
30	Suppliers / Sub-suppliers	In conducting DDS, do the organization need to provide a full list which has the names and addresses of all the sub-suppliers?	According to the Clause 2.1, the organization shall obtain, document and maintain the up-to-date information on the names and addresses of suppliers. However, in Clause 2.3 which also states the organization shall have access to the information on its supply chains (including sub-suppliers).
31	Availability of DDS to the CAB	DDS is provided to the CAB only in a form of link to the consultant's web-page. Would the existing mode of provision by the contractor to the two companies' CW RAs to us (via a link to a difficult to review webpage) be sufficient to address clauses' 5.4 and Annex A, 1.4 of FSC-STD-40-005	There are no specific requirements in the standard about the manner in which the risk assessments and DDS needs to be presented.
32	Availability of DDS to the CAB	DDS public summary and the full version of risk assessment are not uploaded to info.fsc.org. Instead, a link to external web-page is found in the audit report/risk assessment uploaded to the FSC Database. Does this adequately address clause 5.8 of FSC-STD-20-011? EXAMPLE might be seen here: https://zimmfor.egnyte.com/dl/fCuunpE1N3/FSC_RA_-_Artistic_(Mar._'17).pdf	The FSC requirements regarding public summary are limited to the fact that the public summary should be available on the FSC database. As long as the public summary is available on the database and accessible, the requirements are met. If however, the link is not working, or access to the summary and risk assessment through the link is not possible, then it would be a problem.
33	Update of DDS	Is the company required to submit an updated "written summary of its DDS" to the certification body once they have updated their DDS?	Yes, the organization is required to submit an updated "written summary of its DDS" to the certification body once they have updated the DDS.
34	CB surveillance requirements	Does the CB have to audit the DDS within a certain time period, given the client informed the CAB about updated DDS?	FSC-STD-40-005 V3-1 Clause 3.2 requires the organization to adapt its DDS to use FSC risk assessments within 6 months of their approval by FSC, unless an extension is justified and approved by the certification body. In the case when an organization needs to align their DDS to the newly approved FSC Risk assessment where the risk has changed from 'low' to 'specified', the organization is responsible for designing adequate control measures and implementing them before material is used. An evaluation of the control measures, their implementation and adequacy by the CB would be done at the next surveillance audit. When the risk designation of the supply area has changed, the CB would need to be informed prior to start of procurement from the area, and the CB would need to undertake a review of the control measures that need to be implemented due to the revised risk designation. The CB would need to undertake a second audit/surveillance audit within 3 months of receipt of notification from the CH that it is starting procurement from an area which has been previously designated as 'low risk' but is now of a different risk designation. Although the FSC-STD-40—005 V3-1 standard does not specify anywhere the timeline of three months for conducting the 'second/surveillance' audit, the most relevant portion of the FSC standard that addresses this issue is FSC-STD-20-011 V4-0, clause 4.8, which states: "A chain of custody certificate may be issued before the organization has taken physical possession of eligible inputs (FSC-certified, FSC controlled wood, controlled material, or reclaimed material) if the certification body is satisfied that an operational chain of custody system is in place. In such cases: a) the certification body shall require that the organization notifies it as soon as eligible input stock is available or the production of FSC-certified material has started; b) the certification body shall carry out a (second) site visit or conduct the first surveillance evaluation within three months following the receipt of such a notification, unless the main evaluation has not resulted in any nonconformity related to the management of critical control points." The above clause relates to the Chain of Custody certificate, however, since the underlying principles are the same, we shall use the precedent set by the above clause.

35	Update of DDS	Does the CB have to publish the updated DDS of the client and/or the updated "public certification summary" within a certain time period? Or is this sufficient to do this at the next surveillance audit?	The CB would publish the updated 'public certification summary' at the next surveillance audit (either scheduled audit, if no intervening procurement, or as explained in point (2) above, when a surveillance audit is undertaken within 3 months of notification from the CH that procurement has started from the area)
36	New "NRA" and CNRA Vs. "old" NRA	Within what time shall the company adapt the results of approved CNRA?	Clause 6.2 of the FSC-STD-40-005 V3-1 specifies that "The organization shall adapt its DDS to use FSC risk assessments within six (6) months of the date of FSC risk assessment approval by FSC, unless an extension is justified and approved by the certification body."
37	Replacement of Category 1 in "old" NRAs	Within what time shall the company adapt the risk designation from "New" NRA or CNRA with regards to CW Category 1?	Risk designations for CW Category 1 shall be transferred to the company's DDS accordingly to the effective date of this advice. "Organizations using 'old NRAs' in their due diligence system shall replace controlled wood category 1 (illegally harvested wood) from the 'old NRAs' with controlled wood category 1 from the available, applicable FSC risk assessment developed according to Version 3-0 of FSCPRO-60-002, including: a) Draft national risk assessments when agreed upon by national consensus, or, where not available, b) Approved centralized national risk assessments, or, where not available, c) Draft national risk assessments not agreed upon by national consensus, or, where not available, d) Draft centralized national risk assessments.
38	Replacement of Category 1 in "old" NRAs	Shall the CH adopt the mandatory control measures from the draft NRA for the 1 Category according to ADVICE-40-005-21?	No. Unless the NRA is approved, the Company has only to adopt the Risk assignment from the Draft NRA but not the control measures that they have already developed.
39	Transition Period	What is the timeline for transition from V2-1 to V3-1?	For certificate holders with V2-1: The transition audits need to have taken place by 31st March 2018; with time for addressing all major non-conformities until 30th June 2018. After 30th June 2018, the FSC-STD-40-005 V2-1 is no longer valid and certificates issued against that version, which have not yet successfully transitioned to V3-1 will expire.
40	Transition Period	How can an organization be certified against V3-0 today?	They might have been audited against V3-0 until 30 June 2017, and then underwent the transition to V3-1 at the next audit taking place according to the regular audit schedule. Today in 2018, there is no chance to be certified against V3-0.
41	DDS	Does a publicly available summary of DDS need to include risk assessment with regards to risks of mixing?	Yes, it shall include the risk assessment of risks of mixing
42	DDS	What is meant by "where relevant" at the end of Requirement FSC-STD-40-005 1.3 : The organization shall ensure that the organization, the certification body, and Accreditation Services International are granted access to evidence of conformity with applicable requirements of this standard, including access to documents, sites, premises of suppliers and sub-suppliers, and supply units, where relevant.	In situations when there is no need to identify particular supply units, there is no need to ensure access to these supply units.
43	Stakeholder Consultation	The organization shall provide a written summary of its DDS to the certification body". Under "Note 2" it is stated "The summary of the DDS is not required to be in one of the official languages of FSC (English and Spanish)." Is it however required that the summary of the company's DDS is translated in all languages where the CB must conduct stakeholder analysis?	There is no requirement in FSC-STD-40-005 V3-1 for the organization to produce the summary of its DDS in any specific language, and that there are no explicit language requirements for CB stakeholder consultations in FSC-STD-20-011 V4-0. (For comparison, requirements for CB stakeholder consultations in forest management evaluations make it clear that stakeholders must be contacted and have the opportunity to respond in an appropriate local language (FSC-STD-20-006 V3-0 clause 2.2 note), but do not include an explicit requirement to translate any information provided by the organization.) Clause 6.1 d) in FSC-STD-20-011 requires that the CB shall " employ effective and culturally appropriate means of invitation, notification, and consultation". Therefore, although there is no normative requirement for CBs to translate the summary of the DDS, it may be necessary to meet the above requirement.
44	DDS	How shall CBs threat the absence of an updated public summary of the DDS, if the client has not submitted an adjusted document until end of the given transition period?	A Major NC with 3 months timeline for not updating the Public summary of DDS.
45	Stakeholder Consultation	When is the CAB required to conduct Stakeholder consultation:	1) at the very first transition audit to 40-005 V3-1; 2) at the main evaluations and the reassessments if the risks of origin are not low according to NRA, CRNA
46	Stakeholder Consultation	Shall a company conduct a new stakeholder consultations when the supply area with high risk for Category 3 is extended additionally to 5-10% of its area? Shall a company involve stakeholders, which are relevant for the entire supply area, or just those, who are relevant for the part being added?	1) Yes, Stakeholder consultations are mandatory when the risk is not low for Cat 2 and 3. 2) The consultation shall be adequate to the scale and size of the organization's operations (in this case, with reference to the new area proposed to be added) and needs to include both affected and interested stakeholders.

47	Transition Period	Situation: There are cases where clients that are currently certified to FSC-STD-40-005 V2-1 are planning or about to make the transition to V3-1. However, they are not currently sourcing controlled wood and will not have purchases planned by the audit date. They plan to source controlled wood within the audit period, however, and could already put in place a DDS that e.g. covers potential supply areas, conducts/uses risk assessment(s), and where applicable, designs control measures and conducts stakeholder consultation if required etc. Question: In such cases, can the transition audit be conducted on the DDS they have in place to grant the new certificate (and maybe in this case, a follow up audit could be scheduled to verify full implementation of the DDS), or will it be required to remove FSC-STD-40-005 from the certification scope, and to conduct a first evaluation later once purchases are planned and the DDS is implemented in practice? Or, is there another possibility?	The first requirement is for a full DDS to be in place, with the risk assessment conducted. If 'low risk' is identified, the certificate may be issued based on the transition audit itself, as long as the certification body can ascertain with confidence that the DDS is in place and its operational, the personnel are aware of the requirements, and control measures are ready to be implemented. As such, a certificate may be issued, subject to the condition that there is no sourcing prior to the transition audit date and there is no danger of mixing. We shall now consider two possibilities viz., a) when the CH is having a DDS in place, but is not currently sourcing from the areas and b) when the CH is extending his supply areas to new areas, in between the audits Possibility A – when the CH is having a DDS in place, but is currently not procuring from that area. It is assumed here that the designed DDS and the control measures have been checked for their relevance and adequacy by the CB at the transition audit itself, since the company has already put in place the DDS and planned the CMs. If the company later starts procurement, lets assume again three separate scenarios: the first scenario is when the procurement area is a designated 'low risk' area – the company can undertake procurement normally, without any additional audits. The second scenario, the company procurement area is a designated 'unspecified risk/specified risk' area – here, since the risk was assessed at the transition audit itself, and the control measures identified and reviewed by the CB, the CH can go ahead and implement the control measures and start procurement from those areas. The CB would need to undertake a second audit/surveillance audit within 3 months of receipt of notification from the CH that it is starting procurement The third scenario, when the risk designation of the supply area has changed since the transition audit, and it has gone from 'low risk' at the transition audit, to 'unspecified/specified risk' post audit at a later date (including both company or extended company risk assessments). In this scenario, the CB would need to be informed prior to start of procurement from the area, and the CB would need to undertake a review of the control measures that need to be implemented due to the revised risk designation. The CB would need to undertake a second audit/surveillance audit within 3 months of receipt of notification from the CH that it is starting procurement from an area which has been previously designated as 'low risk' but is now of a different risk designation.Possibility B – when the CH is starting a new area of procurement that represents a change in the scope of the certificate, that would require a new audit by the CB in specified or unspecified risk areas that result from risk assessment for this new area (this risk assessment has to be submitted to CB for the approval). This will require a formal interpretation from our side. In the case when an organization must align their DDS to the newly approved FSC Risk assessment where the risk has changed from low to specified, the organization is responsible for designing adequate CMs and implementing them before material is used. An evaluation of the control measures, their implementation and adequacy by the CB would be done at the next surveillance audit.
48	Mixing in Supply chain	Can you explain "risk of mixing in the supply chain"?	"Risk of mixing in supply chain" refers to risk of mixing material which has been harvested in an area of particular risk determination (assessed for a particular geographical area according to the applicable risk assessment requirements) with non-eligible inputs in its supply chains during transport, processing, and storage. This includes the risk that material is mixed with non-eligible inputs or material with a different origin, which would not allow the risk related to origin to be confirmed. This risk is specific to the organization and additional to risk of material originating from unacceptable sources. In order to efficiently mitigate risk, both perspectives must be considered, and risk mitigation measures must be applied at the proper 'level' of the supply chain. In practical terms, and from the organization's perspective, a risk assessment is a thorough look at its supply chain to identify situations, processes, etc., that may result in unacceptable or non-eligible sources entering the supply chains.
49	Mixing in Supply chain	Many auditors say: You have to assess the risk of mixing in the supply chain, therefore you have to trace the material back, because you need to know the supply chain, otherwise you cannot assess the risk! Is that right?	Not necessarily. If the material origin is determined to be from an area of homogenous risk designation, then further determination of risk of mixing is not required. As stated in the previous answer, the risk of mixing comes into play when there is a risk of mixing material which has been harvested in an area of particular risk determination with non-eligible inputs in its supply chains during transport, processing, and storage. If all material in a supply chain for example is originating from an area of homogenous risk designation, then there does not remain a need for tracing the material back to source.
50	Mixing in Supply chain	a) When sourcing tertiary mill residuals such as sawdust from a flooring manufacturer, it is often difficult to trace the materials back to the forest level. We can ask the manufacture for a list of where they buy lumber but this can involve a huge RA area that is sometimes unmanageable. Any suggestions how to handle? b) How do you verify residual chips from a sawmill? byproducts from process? c) How do you verify sources from remanufactured suppliers? Lumber remanufacturing that takes low quality lumber from many sources and reprocesses into smaller specialty products. The chips from those sources are byproducts from remanufacturing.	By-products from lumber remanufacturing, residual chips and saw dust are all considered as co-products as per the FSC-STD-40-005 V3-1. The provisions related to co-products are provided in Clauses 2.4 and 2.5 of the standard. For documenting origin of co-product inputs, the standard provides 2 options viz., Option A - a) Identify the area with a homogeneous risk designation for each controlled wood category in the applicable risk assessment; or b) Confirm that material was harvested from FSC certified sources, or previously controlled sources (where material was previously sold with the FSC Controlled Wood claim), but supplied to the organization without an FSC claim. Option B – the organization shall document the origin with a legally effective and enforceable agreement with the supplier of the coproducts that includes a statement on the origin that includes a) Information about the origin of the co-products that allows the area with a homogeneous risk designation in the applicable risk assessment to be identified for all five controlled wood categories (e.g. province and/or forest type/ownership); b) A commitment that, in cases where material originates from specified risk areas, the supplier will support the organization to collect the information needed to implement control measures.

51	Transition Period	Could you please confirm if there is procedure/interpretation/directive where it mentions an extension for update FSC Database with new version?	We understand that this question is related to risk assessments. FSC Risk Assessments (NRA and CNRA) are updated on the FSC Database as soon as they are approved, and become effective 6 months from the date of approval i.e., organizations need to adapt their DDS to use the approved risk assessments within 6 months of approval. Regarding extension of date for adaption to the new approved risk assessment, Clause 3.2 of FSC-STD-40-005 V3-1 provides an option for a one time two-month extension of the date of approval, which can be granted by the certification body.
52	Transition Period	Did I understand correctly that CB can extend CH transition period for implementing new NRA or CNRA?	Yes, Clause 3.2 of FSC-STD-40-005 V3-1 permits CBs to provide a one-time 2-month extension for organizations to adapt their DDS to the approved FSC risk assessment, over and above the permitted 6 months from the date of approval.
53	Transition Period	In follow up to someone's question about CBs providing extensions to the use of CNRAs/NRAs, could you please provide some examples of applicable scenarios when this may apply.	The standard requirements permit the CBs to provide a single exceptional extension for a period of two months when justified by circumstances beyond control of the organization. This excludes any problems in planning or scheduling activities. Possible scenarios could include – a) FSC is evaluating a quick review of the risk assessment of the risk designations in the light of new evidence or b) any natural calamity or civil unrest in the region which is beyond the scope of control of the organization or c) a political/administrative redrawing of boundaries, which would affect the scope of the DDS etc. It is ultimately the call of the CB on whether the circumstances are justifiable.
54	Other issues	What do you do with salvage wood? Wood that has been recovered from waste or removed from waterways due to marine hazards. How can NRAs/CNRAs be applied to sourcing salvaged wood, including from non-forest land, when the risk assessments were conducted for forest lands?	FSC-STD-40-005 V3-1 defines Material as," Material originating from a forest (e.g. wood and wood products, and non-timber forest products), or salvaged wood, without an FSC claim, that is being evaluated by the organization to determine whether it originates from acceptable sources." As per the above definition, salvage wood can be considered for evaluation as controlled material. Further, risk assessments are not restricted to forest lands, rather, they are for a supply area - The geographical area from which material is sourced. The supply area does not need to be defined as a single contiguous area; it may comprise multiple separate areas that span multiple political jurisdictions including countries or multiple forest types. Typically supply areas comprise of a whole country. For salvage wood as well, the organization needs to implement the DDS, i.e., identify origin to a homogenous risk designation, determine risk and if risk is present, implement control measures. However, on a practical level, the nature of salvage wood itself, i.e., recovered from waste or removed from waterways due to marine hazards etc. might act as mitigating factor for risk. The controlled wood standard is designed to prevent wood from the five categories that FSC considers unacceptable from entering the supply chains. The organization would need to evaluate the salvage wood to determine the risk related to the origin of the material for each controlled wood category.
55	Risk Assessment	Could you indicate the link in which to verify the NRAs approved and under study by FSC?	https://ic.fsc.org/en/what-is-fsc-certification/controlled-wood/risk-assessments Please click on the tab on the right side of the page, somewhere near the middle, which states, "To view the current timetable for CNRA and NRA development, click here."
56	Risk Assessment	The assessment for a country is not yet approved, so what can i use as reference for the risk assessment of the organization?	The answer would depend on the country under reference. Depending upon whether the country was scheduled for an FSC Risk Assessment by December 2017, the organization may use a company risk assessment or an extended company risk assessment. Annex A of FSC-STD-40-005 V3-1 provides details of what should constitute each of these risk assessments. Further, for many countries, the FSC Document Center provides 'old NRAs' or draft CNRAs, which may be used as reference material.
57	Other issues	Would you ever consider other Certification schemes (i.e. PEFC) material as low risk into the FSC CW standard? If not, why?	In principle, FSC does not consider material certified under other schemes as default 'low risk'. However, evidence used to prove conformity to other certification schemes may be used in the DDS to prove origin and/or low risk. In such a scenario also, the assessment will be based on the evidence as such, rather than on the certification status of the material.
58	Risk Assessment	What if a draft NRA submitted to FSC IC does not meet criteria in FSC-PRO-20-006a?	FSC does not have any procedure called FSC-PRO-20-006a. The development and approval of FSC National Risk Assessments is as per the procedure FSC-PRO-60-002 and the contents need to be aligned as per FSC-PRO-60-002a which is the FSC National Risk Assessment Framework.
59	Risk Assessment	When developing a CNRA is there any stakeholder consultation with certified organizations operating in that country?	CNRA development involves a public stakeholder consultation process (at least one round, and in many cases, two rounds). All relevant and interested stakeholders are invited and eligible to provide their comments and feedback on the CNRA document. This applies to also to certificate holders as well as certification bodies operating in the country.
60	Risk Assessment	Why do NRAs supersede CNRAs? In case a country has a weak environmental chamber it can be possible to conduct a weak NRA in consensus. In such a case CNRA would most certainly provide more objective and demanding risk assessment which would be better aligned with other countries' risk assessment. Do you see a problem here?	NRAs are developed by country level working groups, who have participation of economic, social and environmental chamber representatives. As such, they are considered to be more representative and reflect the ground situation in the country more accurately, whereas CNRAs are developed by consultants engaged by FSC. The consultants may or may not have the depth of knowledge or access to information that members of the working group are expected to have. In either case, the developed documents (CNRA as well as NRA) undergo multiple rounds of review by FSC reviewers, who check for accuracy and compliance to the approved risk assessment development procedures as well as calibrate the risk designations with neighboring/similar countries to ensure better alignment. Further, both CNRA and NRA are subject to public stakeholder consultations. As such, all other factors being equal, it is expected and experienced that NRA development processes tend to better reflect the level of risks on the ground than CNRA, and that is the reason the NRAs supersede CNRAs.

61	Risk Assessment	Can a company risk assessment refer to unpublished FSC risk designations?	Yes, Annex A of FSC-STD-40-005 V3-1 provides for organizations to use 'known and available sources of information' – this includes unpublished FSC risk designations as well.
62	Risk Mitigation	What kind of control measures are acceptable if I purchase from a trader? Traders would not like to provide information about their suppliers.	The standard does not provide much flexibility in this regard. Even if the purchase is from a trader, you would need to have access to information to a level that allows you to confirm and document: a) The origin of the material; b) The risk related to the origin, and the risk related to mixing with non-eligible inputs in the supply chain c) The mitigation of risk Depending on the level of risk, if the control measures need to be implemented at the supply unit level to mitigate the risk, then you will need to collect information up to that level. If, however, mitigation is possible through measures that don't involve going to the field level i.e., through document verification, stakeholder consultations etc., then you don't need to collect information about sub-suppliers of your supplier.
63	Risk Mitigation	a) We have implemented supplier audits on MU level as CM for an unspecified risk area (Country). We did a sample approach: sample of our direct suppliers (using "old" approach 0,8Ön) and sample of their supplier = MU using a lower sample size (min. 3 until max. 0,5Ön depending on own defined risk) - can you give any advice, examples, etc. if this might work or not or how to define that? b) Does the company have to verify ALL suppliers annually or can it be sampled? c) As it relates to a DDS - What is an acceptable sampling of an organizations CW suppliers annually? d) If an organization does onsite field verification visits with GPS locations of 10% of its CW suppliers, is that an acceptable CM within its DDS?	Sampling frequency and intensity of sampling depends upon the risk. The standard does not specify anything in this regard, and leaves it to the judgement of the certificate holder to see what is the sampling intensity required for risk mitigation. The only requirements that the standard specifies is that the control measure needs to be adequate to mitigate the risk – this might require a more or less intensive sampling, and in many cases sampling might be avoidable all together!
64	Risk Mitigation	Does documented education of an organizations CW Suppliers about unacceptable materials sources serve as a CM within its DDS?	That would depend upon the risk, and whether such an action is sufficient to mitigate the risk. However, on a practical level, a documented training would be difficult to prove as an adequate stand-alone control measure, and it might work better as a part of a combination of measures. However, it is difficult to say with confidence at this stage, as it would depend on the risk itself.
65	Risk Mitigation	The CNRA in Latvia suggests to mitigate a HCV risk via field control of every logging site, and this is what we are currently doing. In your presentation you mentioned several times that sampling should still be OK in the new CW model. Do you see a contradiction between your view and the CNRA's mitigation measure?	Mitigation measures provided in the CNRA are not mandatory. As shown in the presentation, organizations are at liberty to select the control measures which are most suited to mitigate the risk. Depending on the risk, a sampling of field visits might also be sufficient to mitigate the risk.
66	Risk Mitigation	Section 4 of the standard differentiates between "Control measures established by the organization" and "Control measures provided in an NRA ". Does the latter also include recommended CMs provided in a CNRA? Additionally, the requirements for control measures provided in an NRA only refer to mandatory CMs in the NRA. Do they also refer to recommended ones? The reason I ask is this has implications for the engagement of experts when developing CMs	As per Clause 4.12 of the FSC-STD-40-005 V3-1, the organization shall implement control measures provided as 'mandatory' in the NRA. For control measures provided in a CNRA, or control measures not designated as 'mandatory' in the NRA, the organization is at liberty to adopt the control measure, adapt it to suit its requirements, or ignore those control measures and develop new ones. The requirements of Clause 4 of the standard specify only that control measures need to be adequate to mitigate the risks. What constitutes adequate control measures is for the organization to decide, based on the extent of risk and the nature of its sourcing and supply chain.
67	Risk Mitigation	Could a mandatory Control Measure included in a NRA be the creation of local committees to elaborate more control measures in the future (probably not included in the NRA)? (seen in a draft NRA recently) I would like to know what FSC IC thinks of this.	The control measures that are provided in the NRA are designed for organizations to mitigate the risks identified. i.e., they are targeted at organizations who are implementing the standard, and who need to mitigate the risks prior to using the material as controlled material. If the specific control measure is essential and unavoidable to mitigate the risk, it may be included as mandatory. However, control measures need to be SMART i.e., specific, measureable, achievable, relevant and tangible. Without going into the details, it is difficult to understand in the present case how creation of local committees would lead to mitigation of identified specified risks, especially when it is not clear what the organization needs to do. However, a modification of that control measure e.g., requiring participation of the organization in committees established to devise locally relevant control measures might be considered as a control measure.

68	Risk Mitigation	Companies have an option to develop alternative control measures to the mandated control measures of the NRA. What type of justifications are needed to allow this? Or, can all companies just have the option regardless the reason?	Please refer Clause 4.13 of the FSC-STD-40-005 V3-1. It states, The organization may replace mandatory control measures provided in the NRA with more effective control measures, under the following conditions: a) The organization demonstrates that control measures provided in the NRA are inadequate to mitigate risk found in the organization's specific operations; b) The organization demonstrates to the certification body that the alternative control measures are sufficient to mitigate the risk, and the certification body approves the alternative control measures; and c) The organization has, after approval by the certification body, forwarded a description of the alternative control measures, and justification for their use, to the body responsible for NRA maintenance (as defined in the NRA)
69	Risk Mitigation	In our NRA one obligatory control measure establishes that a stakeholder consultation needs to be made 6 weeks before the harvesting, but in some cases the supplier can offer the wood already harvested to a certificate holder (CoC) with FSC-STD-40-005 in the scope... in our case (plantations with all legal permits verified). This would mean that the wood cannot be considered as CW?	We would request you to contact your FSC Network Partner for clarity and advise in this regard. If stakeholder consultation 6 weeks prior to harvesting is a mandatory control measure, then the wood that is offered that is already harvested would normally not be considered as controlled material. However, this would also depend on a large extent on many circumstances as well e.g., if the material was harvested prior to the implementation of the DDS by the company, then the CM is not applicable. Further, such obligatory control measures as described above, in practice usually are retained for harvests from natural forests and not plantations, unless the harvest area contains HCVs. We would advise you to refer in detail to the concerned NRA, as within the risk designations under each category, there might also be functional classifications e.g., some risks might be applicable to natural forests and not to plantations etc. Please refer to your FSC network partner/working group for more details, or contact us directly with more information.
70	Risk Mitigation	The Risk mitigation section of the standard is mainly divided between "Control measures established by the organization" and "Control measures provided in an NRA". Under control measures established by the organisation is: 4.9 For controlled wood categories 2 and 3, the organization shall use the opinion of at least one expert to justify the adequacy of control measures. Experts used shall meet the minimum requirements provided in Annex C. NOTE: The organization may also use publicly available reference material developed by experts (who meet the requirements of Annex C) to justify the adequacy of control measures. This is an important requirement, because as you know, these categories (3, in particular) commonly have specified risk designations. It is only relevant to control measures established by the organisation, but I'd like to clarify how "Control measures established by the organization" is defined, in terms of whether this includes recommended CMs in NRAs or CNRAs. I think it's important to clarify, because the requirements under "Control measures provided in an NRA" only refer to mandatory CMs, which appears to be causing confusion for certificate holders. They are unsure if the only control measures that DO NOT have to involve expert opinion are mandatory CMs in an NRA, or if they also do not need expert opinion when they are implementing recommended CMs in an NRA or CNRA.	To clarify, control measures present in an approved CNRA or NRA (both mandatory and recommended control measures) are publically available documents developed by experts, and have been approved by FSC International. As such, using the requirements specified in Clause 4.9, the organization does not need to engage other experts to justify the adequacy of its control measures (in case the organization is implementing control measures other than those provided in the CNRA/NRA, then it would need an expert to justify the adequacy of the control measures).
71	Other issues	What about the Global Forest Registry as source for information? On the one hand it is outdated, on the other hand the CW standard still requires to use it!	The CW standard mentions the Global Forest Registry (GFR) as one of the sources of information, and not the only source. Annex A Clause 3.4 specifies Global Forest Registry as one of the sources of information that needs to be included, in addition to other sources. Further, it also specifies that risk designations provided in the GFR are to be used as a base, and further verified based on the other requirements provided in Annex A.
72	Other issues	To what extent the identification of HCVs is required in the supply area? i.e. - shall the organization conduct a full survey for identification of HCV category 1.2 (species) and 1.3?	That would depend upon the extent of risk identified in the risk assessment, and the nature of the control measure that is designed to mitigate the risk. Depending on the area of sourcing, there might be further functional classification in the risk assessment, which would provide more guidance on the level of identification of HCV categories 1.2 and 1.3.
73	Stakeholder Consultation	When Stakeholder consultations are not mandatory as a CM and the company decides to implement it (e.g. Category 1), are they required to follow Annex B completely (e.g.: 6 weeks for consultation prior to management activity)?	The standard specifies as per Clause 1 Annex B FSC-STD-40-005 V3-1 that when a stakeholder consultation process is conducted, it shall be implemented based on adequacy to the size and scale of the organization's operations and shall be based on the requirements specified in Annex B.

74	Stakeholder Consultation	When stakeholder does not answer, what to do? Was INT_22 "affirmative and positive response from the stakeholders" addressed? i.e. how the heck can we force responses from stakeholders.	Annex B of the FSC-STD-40-005 V3-1 standard specifies the minimum requirements that organizations need to fulfill while undertaking stakeholder consultations. This includes among other requirements, identifying relevant and interested stakeholders, notifying them of the consultation process and providing access to information. Provided these requirements are fulfilled, absence of stakeholder feedback does not constitute a non-compliance as far as the requirements of FSC-STD-40-005 V3-1 are concerned. INT-STD-40-005_22 refers to affirmative and positive response from stakeholders. Lack of any response from stakeholders does not mean that there is an 'affirmative and positive response' for a low risk designation. It only means that either, a) stakeholder identification and outreach was insufficient, or b) stakeholders don't feel obligated to respond to the consultation, either out of indifference, or inability to comment or lack of knowledge or some other mitigating circumstances. INT-STD-40-005_22 is related to demonstrating 'low risk' for Controlled Wood Category 3 Indicator 3.2, and significant support from stakeholders is provided as one of the means of proving 'low risk'. If that is not possible, then certificate holders need to look at the other options provided.