



Forest Stewardship Council®



# Informe de la primera consulta pública del estándar FSC-STD-40-004 V3-0 D1-0

## Resumen de los resultados de la consulta

El FSC-STD-40-004 es el principal estándar FSC que determina los requisitos para la certificación de Cadena de Custodia (COC, por sus siglas en inglés) de organizaciones que comercian y fabrican productos forestales certificados FSC. Entre el 19 de diciembre de 2014 y el 28 de febrero de 2015, un primer borrador modificado de este estándar se sometió a una consulta dirigida específicamente a la membresía del FSC y a los actores afectados. Este informe presenta un resumen de la retroalimentación de actores clave que se recibió durante esta consulta y los comentarios del FSC sobre cada uno de los temas.

El FSC recibió 2,093 comentarios de 210 consultados. Los comentarios individuales se presentan en la Tabla A. Por razones de confidencialidad, los nombres de los consultados se omiten en este informe. Algunos comentarios aparecen más de una vez pues se recibieron comentarios idénticos enviados por más de un actor social.

El personal del FSC y el grupo de trabajo analizaron y tomaron en cuenta todos los comentarios, respetando la viabilidad técnica y la concordancia con la misión y la planificación estratégica del FSC. A continuación se presenta un resumen de los temas clave identificados en la consulta.

### **1. Cuentas centralizadas de créditos compartidos (método de crédito entre sitios)**

Un total de 15 empresas sometieron a prueba piloto el método de crédito entre sitios y los resultados se presentaron ante el Consejo Directivo del FSC en junio de 2013. El Consejo Directivo decidió que los resultados del proyecto piloto deberían integrarse al proceso de modificación del estándar de COC (FSC-STD-40-004) que estaba en curso para una consulta más amplia a los actores sociales y mayores deliberaciones. Al final del proceso de modificación del estándar, el Consejo Directivo del FSC decidirá si debiera o no autorizar los sistemas de crédito entre sitios.

La primera consulta pública de este estándar arrojó un fuerte apoyo de los titulares de certificados que ven el potencial de esta propuesta para abordar el desequilibrio entre oferta y demanda de productos certificados FSC en sus distintos sitios de fabricación. Algunos actores sociales apoyaron la propuesta de créditos entre sitios con la condición previa de que se utilizara la Plataforma de Declaraciones en Línea (PDL). No obstante, puesto que la PDL continúa en la fase de desarrollo, resulta imposible considerarla como parte de los requisitos de créditos entre sitios. El FSC considerará esta opción sobre la base de los comentarios que recopile durante la segunda ronda de consulta pública del estándar FSC-STD-40-004 y las aportaciones del Consejo Directivo del FSC.

Las condiciones previas para utilizar el método de créditos entre sitios se modificaron en el segundo borrador del estándar FSC-STD-40-004, con base en la retroalimentación y sugerencias de los actores sociales. En el segundo borrador, los requisitos relativos al alcance geográfico, grupos de productos, monitoreo de la entidad de certificación y la aportación de los sitios a la cuenta de crédito aparecen modificados.

Algunos actores sociales propusieron que el concepto de créditos entre sitios se aplicara también al sistema de porcentaje. El personal del FSC y el grupo de trabajo discutieron esta propuesta, sin llegar a alcanzar un acuerdo, ya que un sistema de porcentaje entre sitios es técnicamente imposible, puesto que el sistema de porcentaje requiere que el material se mezcle físicamente. No obstante, la razón principal para no introducir el porcentaje de créditos entre sitios en el borrador del estándar es el riesgo de declaraciones engañosas inaceptables (por ej., el declarar que un producto que solo tiene 10% de contenido FSC es FSC Mixto – 70%). En el sistema de créditos este mismo riesgo no existe, ya que la declaración especifica claramente que se está vendiendo un crédito FSC. Las empresas que requieren esta flexibilidad podrían, de cualquier modo, implementar el método de créditos entre sitios (si lo llega a aceptar el Consejo Directivo del FSC al concluir el proceso de modificación).

## **2. Verificación de operaciones (cláusula 3.4.1)**

El FSC recibió una cantidad considerable de comentarios de los actores sociales con respecto a esta cláusula; algunos apoyándola y otras expresando inquietudes relativas a posibles repercusiones, tales como la seguridad de los datos, una mayor complejidad y los costos. Con el fin de responder a los comentarios de los actores sociales y de proporcionarles información más detallada acerca de esta propuesta, el FSC preparó un documento de trabajo relacionado con la verificación de operaciones y las posibles opciones para cumplir el criterio propuesto; este documento ha sido emitido para consulta pública junto con el segundo borrador del estándar FSC-STD-40-004.

## **3. Cambio en la clasificación del papel recuperado pre-consumo**

Diversos actores sociales apoyaron el cambio propuesto, mientras que otros objetaron el proceso y sus resultados. No obstante, el FSC aplicó todos los procedimientos que correspondían para asegurar el involucramiento de actores sociales en este proceso. En 2011, la membresía del FSC ordenó al FSC Internacional que llevara a cabo un estudio para evaluar, desde las perspectivas económica, ambiental y social, los riesgos y beneficios de valorar los materiales de fibras de papel recuperadas pre-consumo como contenido certificado FSC. El estudio se redactó como documento de trabajo, con base en las aportaciones hechas por actores sociales a través de una encuesta a la membresía FSC, un taller para actores sociales y entrevistas telefónicas a empresas papeleras. Entre el 25 de septiembre de 2013 y el 15 de enero de 2014, el documento de trabajo se sujetó a una consulta dirigida a la membresía del FSC y algunos actores interesados. Los resultados del estudio y la retroalimentación de la consulta mostraron que la membresía del FSC apoya la propuesta de conceder a la fibra de papel pre-consumo el mismo valor que al material post-consumo y a la fibra certificada virgen. El Consejo Directivo del FSC, en su 66 reunión (julio de 2014) decidió clasificar el papel recuperado pre-consumo como un insumo partícipe en la declaración que cuenta para los cálculos de porcentaje y crédito. El estudio y la decisión del Consejo Directivo del FSC excluyeron otros materiales basados en el bosque recuperados pre-consumo tales

como madera y corcho. A sugerencia de algunos actores sociales, el FSC considerará realizar un nuevo estudio para evaluar los riesgos, impactos y oportunidades de cambiar la clasificación de otros materiales recuperados pre-consumo. Idealmente, los actores sociales deberían presentar esta propuesta en la siguiente asamblea general del FSC.

#### **4. Incorporación de notas aclaratorias e interpretaciones del estándar**

El FSC ha intentado simplificar y abreviar el estándar FSC-STD-40-004 modificado (comparado con la versión actual). No obstante, no fue posible reducir significativamente el tamaño del documento puesto que se incorporaron al nuevo borrador varias notas aclaratorias e interpretaciones del estándar con el fin de mejorar la claridad de los requisitos y reducir el número de documentos normativos. Algunos actores sociales preguntaron por qué no todas las notas aclaratorias e interpretaciones del estándar quedaron integradas al estándar en borrador. Lo anterior se debe a que estos documentos son antiguos y abordan situaciones bastante específicas, las cuales no son relevantes para todos los titulares de certificados. Intentamos lograr un equilibrio entre la simplificación y la reducción de varios documentos. También es importante aclarar que las interpretaciones de estándares no tienen la intención de quedar incorporadas a los estándares, ya que no introducen nuevos requisitos sino que aclaran los existentes. Por lo tanto, constituyen información complementaria para los requisitos normativos y se tiene la intención de mantenerlos en la página Web del FSC como interpretaciones de requisitos.

#### **5. Simplificación de estándares y acceso mejorado a la certificación para empresas pequeñas, minoristas y contratistas de obras**

Una de las metas globales de esta modificación del estándar es la simplificación de los requisitos de certificación de COC. La modificación también tiene el objetivo de abordar dos mociones de la Asamblea General del FSC de 2011:

- La Moción 44 ordena la modificación del estándar de COC y el desarrollo de herramientas y plantillas para mejorar el acceso a la certificación de las pequeñas empresas.
- La Moción 45 exige que el FSC analice los obstáculos y las oportunidades para una colaboración mejorada FSC-minoristas, incluyendo procedimientos de COC mejorados.

Como respuesta a la Moción 44, el FSC discutió con el grupo de trabajo y el foro consultivo de la COC, la propuesta de desarrollar un estándar de COC simplificado para empresas pequeñas y poco complejas. Un primer borrador de este estándar simplificado se desarrolló y compartió con el grupo de trabajo y el foro consultivo para recibir comentarios. La retroalimentación y la conclusión de este proceso inicial fue que el FSC debería involucrar de una mejor manera a estas organizaciones pequeñas y poco complejas con el fin de comprender mejor sus necesidades y desarrollar estándares y herramientas para facilitar su certificación.

Con base en lo anterior, el FSC decidió seguir adelante con la consulta del estándar FSC-STD-40-004, centrándose en el interés general de los actores sociales, el cual es tener un estándar de COC simplificado y abreviado que se ajuste a empresas de todo tamaño, para luego simplificar aún más o explicar los requisitos para las pequeñas empresas.

En cuanto a la Moción 45, el FSC también consultó a los proponentes de la moción y otros minoristas para comprender mejor sus dificultades al implementar el estándar actual de COC. En este proceso de modificación se están proponiendo algunos cambios para facilitar la certificación de minoristas (por ej., requisitos para cambios al grupo de productos, verificación de facturas entrantes y resúmenes de volúmenes).

El FSC también recibió retroalimentación de que algunos requisitos del estándar actual de COC no son fácilmente implementables para los contratistas de obras. Con el fin de comprender mejor esas cuestiones, el FSC consultó a actores sociales y organizó una reunión con entidades de certificación, empresas y socios de la red FSC para recopilar sus aportaciones a este proceso de modificación. Algunos requisitos también se modificaron para abordar las necesidades de este grupo de actores sociales (por ej., requisitos para hacer cambios en la elaboración de informes y en la identificación de documentos de ventas).

Por último, el FSC agregó al estándar varios ejemplos, tablas y gráficas para facilitar la comprensión de varios requisitos. Algunos actores sociales sugirieron que las tablas y gráficas se trasladen a un anexo al estándar, pero el FSC considera que la presentación de los gráficos antes de los requisitos ayudará a los actores sociales a comprender mejor el contenido técnico del estándar y reducir el riesgo de interpretación y aplicación poco homogéneas de los requisitos.

#### **6. Establecimiento de grupos de productos y aplicación del sistema de crédito**

En respuesta a la Moción 46, la cual requiere que el FSC aclare la intención del sistema de crédito, el FSC modificó los requisitos sobre el establecimiento de grupos de productos y algunos elementos del sistema de crédito. Los requisitos actuales sobre grupos de productos para los cuales se aplica el sistema de porcentaje o crédito señalan que el producto deberá compartir especificaciones similares en relación con la calidad de los insumos y los factores de conversión. Actualmente, el término 'calidad' se interpreta de distintas maneras, conduciendo a una aplicación poco homogénea del concepto de grupo de productos. El estándar de COC modificado incluye una definición de calidad y especifica que un factor de conversión similar se da cuando la variación no es superior al 10%. Los criterios modificados para grupos de productos señalan que los productos deberán estar hechos del mismo insumo o conjunto de insumos y establecen las condiciones para la sustitución de materiales de insumos dentro de un grupo de productos. El estándar modificado también aclara que las organizaciones que aplican el sistema de transferencia no están obligadas a establecer grupos de productos y pueden implementar el sistema de control FSC a nivel del tipo de producto.

El período para el vencimiento del crédito se amplió de 12 a 24 meses, puesto que muchas empresas informaron que están perdiendo créditos debido a que los ciclos

entre la obtención y las ventas con declaraciones FSC son más largos que la validez de los créditos.

Otro tema crítico en el primer borrador fue el requisito de que las organizaciones deberían establecer cuentas de crédito separadas para materiales de insumos de distinta calidad en el caso de productos de madera ensamblados. El FSC recibió considerable retroalimentación negativa con relación a esta propuesta durante la primera consulta. Varias empresas informaron que experimentarían dificultades para mantener su certificación si se implementaba este cambio. El segundo borrador ya no incluye este requisito, aunque proporciona un enfoque similar al sistema de porcentaje: que cuando el material de alta calidad se obtiene como madera controlada FSC, éste no represente más del 30% de la composición del producto.

El estándar en borrador modificado también señala que cuando los materiales de insumo generan insumos que pertenecen a categorías diferentes de tipos de productos (por ej., madera aserrada, corteza y aserrín), la organización debe considerar cada producto como un grupo distinto de productos, aplicando los factores de conversión respectivos para el cálculo de los créditos.

El estándar modificado también señala los requisitos relacionados con el intercambio de materiales de insumos de baja calidad y alta calidad en las cuentas de crédito (por ej., las empresas no tienen permitido sustituir madera de alta calidad con madera en pulpa). En el caso de fibras, se proporciona una mayor flexibilidad puesto que distintos tipos de pulpa (por ej., fibra corta, fibra larga) pueden clasificarse en la misma categoría de material.

## **7. Definición de quién necesita la COC**

Algunos actores sociales ofrecieron comentarios sobre el alcance de la COC, es decir, “quién necesita la COC”. Se hicieron algunos ajustes a esta sección con el fin de aclarar dónde termina la COC. Los actores sociales también deberían considerar la definición de productos terminados. Es importante aclarar que el FSC no puede especificar dónde termina la COC para ciertos tipos de productos y actividades. Lo anterior se debe a que algunos productos pueden clasificarse como producto no terminado si se utiliza como insumo en la fabricación de otros productos (por ej., madera aserrada vendida a un fabricante de muebles), o como producto terminado si está listo para venderse y para que lo use el consumidor final (por ej., madera aserrada vendida directamente a consumidores finales).

## **8. Procedimientos documentados**

Algunos actores sociales se quejaron de que el estándar modificado señala que los procedimientos deberán documentarse (es decir, estar por escrito), mientras que el estándar de COC actual establece que podrían documentarse o no. El FSC decidió exigir procedimientos documentados con base en la retroalimentación de entidades de certificación y de Accreditation Services International (ASI) – es decir, dificultades en aprobar y verificar la conformidad de organizaciones que no tienen en funcionamiento procedimientos documentados. Los procedimientos documentados son un requisito fundamental para la calidad del sistema y deberían ser la base para la aprobación e implementación de un sistema FSC de COC.

## **9. Legislación de legalidad de la madera**

El FSC incorporó cuatro notas aclaratorias relacionadas con la legislación de legalidad de la madera en el estándar en borrador de COC e intentó hacer estos requisitos lo más breves posible, sin que perdieran claridad. Algunos actores sociales sugirieron que el FSC eliminara toda esta sección del estándar. Sin embargo, asegurar el cumplimiento con la legislación de legalidad de la madera es esencial para la credibilidad del sistema FSC y la aceptación de productos FSC en mercados donde estas legislaciones son aplicables. El término 'aplicable' también se cuestionó varias veces, pero éste es relevante para asegurar que las organizaciones no usen indebidamente los requisitos en situaciones más allá del alcance de las legislaciones de legalidad de la madera.

## **10. Requisito de que el nombre/visible que se da en cuanto a especies de madera de un producto (por ej., armario de cerezo) debería obtenerse en fuentes certificadas FSC en lugar de fuentes de madera controlada FSC (cláusula 3.2.4)**

La Moción 43 de la Asamblea General del FSC de 2011 exige el desarrollo de una política para orientar a los titulares de certificados para que sean veraces y transparentes en sus comunicaciones sobre productos FSC Mixto cuyos componentes visibles y característicos no son certificados FSC, sino madera controlada. En el primer borrador, el FSC incluyó una cláusula que exigía que esos componentes visibles estuvieran certificados, pero luego recibió una cantidad considerable de retroalimentación negativa de los actores sociales. Muchos de ellos argumentaron que tendrían que rescindir su certificación si se introducía dicho requisito al sistema FSC. El FSC también consultó a los proponentes de la moción, quienes aclararon que ellos esperaban que la moción se abordara a través del estándar de marcas registradas y no del FSC-STD-40-004. En consecuencia, la moción se eliminó del segundo borrador del estándar modificado de COC.

**Tabla A.** Comentarios recibidos en la primera consulta pública del estándar FSC-STD-40-004 (en inglés).

Reference Part No. / Clause. No. / Note/Annex/ Definition	Type of Comment G = general; T = technical; E = editorial	Comment Justification / rationale for change	Proposed change Suggested new wording (additions, modifications, deletions)
General	G	<p>This standard proposes a large number of changes which add complexity to the CoC system. This provides a disincentive for companies to become or remain FSC certified, at a time when many companies are already dropping their CoC certifications due to the complexity of existing requirements.</p> <p>The ultimate result can be reduction of the number of certified companies and the availability of certified product, which will also result in less demand for forests to be certified.</p>	Reconsider the broader scope of changes, and minimize changes which add complexity and do not add substantial value to the system.
General	G	<p>This draft standard does not provide product identification options from communities and small producers, as provided in FSC-ADV-50-003 V1-0 of January 19, 2012. The inclusion of this is essential for the traceability of this type of product.</p> <p>Note that this ADV was created in the context of implementation of the motion 19, adopted at the General Assembly of 2008, which aims to improve access to market these products. See text of the motion below:</p> <p>FSC shall develop a strategy to differentiate community forest products* from other products, that allows a phrase like "COMMUNITY ORIGIN PRODUCT", in the claim on the FSC product. The strategy shall include all relevant aspects of Chain of custody and labeling to guarantee product traceability.</p> <p>In the same direction the current proposed FSC Strategic Plan has clear objectives and goals of "creating social value" for certification, through the increase of certified forest area under management of communities and small farmers, especially in natural forests in the tropics. (See GLOBAL PRIORITY 01 Objective 1.1, indicator 1.1.1).</p>	Include ADV-50-003 V1-0 from January 19 2012 2.2 for identification of products from Community and small producers within the Chain of Custody Standards.
Consultation	G	To me a word document, even in the format of a table, is not a practical tool for a consultation on such a long and complex document. It does not reflect the technical possibilities of the 21st century and does not characterize FSC as a stakeholder-friendly organization.	Please change to web-based consultation in the second round of the consultation of the COC standard. And generally for future consultations.
effective and validity dates	T	<p>Although according to FSC-PRO-01-001 (V3-0), a period between publication date and effective date can be as short as 90 days, we should allow much more time for this standard revision for following reasons:</p> <ol style="list-style-type: none"> <li>1. FSC-STD-40-004 is the most used standard among all CoC CHs and it means the impact of revision is huge. In some countries, CHs will expect an official seminar from national offices. National offices need to study the published standard and prepare for the seminar. CHs then need to adjust their operation to meet the revised and new requirements.</li> <li>2. Since the revision is a major revision which includes a new concept of transaction verification, CHs will need to study thoroughly before making any changes to their operation. In some cases, they may need to make changes to computer system or something which requires certain amount of budget to be prepared. Getting a budget is at least one-year process in many companies.</li> <li>3. 90 days is too short as in many countries, national offices and CBs need to prepare translations for CHs. Translation process often takes more than 2 weeks.</li> </ol>	We have sufficient time between the publication date and the effective date for national offices, CBs and CHs to correctly understand the new and revised requirements and to amend their operations accordingly. I suggest 12 months of leading time for this. In any case, it should never be less than 6 months.
Foreward	T	Should FSC-STD-50-001 be cited as a complementary standard	Add FSC-STD-50-001



General	G	Appvion relies on its vendors to supply both FSC Certified material and FSC Controlled Wood material. Our continued participation hinges upon viable supply from many sources: paper, pulp, and timber. We are concerned about FSC's capabilities to create a sustainable CoC from forest to consumer.	
General		Consider a glossary "style guide" that helps FSC IC staff determine when the descriptor "FSC" is germane to the definition of a given term.	
General	G	When a customer requests for FSC wood it should be mandatory that the supplier/ contractor delivers FSC wood and applies the FSC procedures. Right now in the Netherlands many customers ask for sustainable wood, but the (certified) supplier often does apply the FSC procedures eliminating administration or even worse buying FSC wood. If the contract with the customer says FSC wood the FSC standard should force the certified company to supply according to the standard. If this is mandatory the certifier can audit on this rule and more FSC wood will reach the end user.	
General	E	Notes for CB's	Remove and place in FSC-STD-20-001 – General requirements for CB's
General	E	All tables and graphics.	Place in an appendix, to make the main standard shorter and more specific.
General	T	The proposed draft includes a great deal of unnecessary and complicating detail – likely to make it less effective and credible in practice.	Please see various detailed annotations in the document referenced here: <a href="http://mxwood.com/wp-content/uploads/2014/12/FSC-STD-40-004_V3-0_EN-annotated-by-MW-22Dec2014.pdf">http://mxwood.com/wp-content/uploads/2014/12/FSC-STD-40-004_V3-0_EN-annotated-by-MW-22Dec2014.pdf</a>
General	T	It is entirely practical and very desirable to simplify the format and detail of the 40-004. Advantages include reduced error rates, and improved auditability.	Please see this document for a proposed format: <a href="http://mxwood.com/chain-custody-simplified/">http://mxwood.com/chain-custody-simplified/</a>
General	G	FSC has been explicit about the fact that motion 44 from GA 2011 is implemented in the new CoC-draft. We know that a part of this is reached by making tools and templates for smaller companies when the new standard is finally approved but we also must emphasize that you can only simplify certification for small CoCs to a certain degree by restructuring and developing tools, and that the standard alone in terms of content and requirements must also be changed in order to meet the expectations of a more simple FSC in our membership. Expectations FSC centrally and decentrally have co-created.	The standard needs to be simplified in terms of how requirements can be met and how the apply using risk based approaches.
General	G	The focus on documents to make volume control understandable is nowadays a restrictive point of view. In general the purpose should become clear: material with FSC claim should be linked with delivery documents or the registration of sales. The result should be that transactions should always match to respective materials. Otherwise, if not clarified, auditors will always ask for documents and situations, in which no documents were used but only electronic data transfer was made and will thus be difficult to assess.	

General	G	<p>We recommend not using the term “FSC-certified product” or “certified output” or similar expressions.</p> <p>Management and volume accounting systems can be audited against FSC requirements. The entity that manages such a system hold an FSC certificate and was granted the permission and right to make product claims. There are standards that allow and are made for product certification such as the Blue Angel.</p> <p>In the market place there is a lot of confusion about whether the status “FSC certified product” can be inherited also if a trader or even a producer is not certified. There is also the confusion that the FSC certificate indicates something on the overall output of an organization.</p> <p>See also passed motion 36/2014</p> <p>The standard should be technically crystal clear, even though we know that the expression “certified product” might remain as colloquialism.</p>	To replace the term “certified product”, “certified input”, “certified output” and similar through the term “product with an FSC claim”, “input with FSC claim”, “output with FSC claim”.
General	G	<p>Could the project certification not be included into the FSC-STD-40-004 as fourth volume accounting system? General rules are similar, sure there are a number of provisions that are specific to project certification such as that input material with FSC claim can be passed on also by non-certified suppliers. However it might reduce redundancies in the FSC system and could enhance the understanding of what Chain-Of-custody is about.</p>	To add a fourth volume accounting system “project volume accounting”.
General	G	<p>Broaden scope of COC-certification for B&amp;C companies</p> <p>In specifications often FSC-certified timber and timber products are prescribed. However, once the contract is granted to a contractor there is often no or hardly any FSC-certified timber (products) applied in the project. This is also the case when contracts are granted to FSC-certified contractors. At the annual audit these projects are not considered by the CB as they are not FSC-projects</p>	<p>In order to make COC-certification more significant for both FSC-certified contractors as well as for their commissioners (clients) the scope of FSC-certification should be broadened and the CB’s should look at at least a sample of all contracts and the underlying specifications. If specifications specify the application of FSC-certified timber the project should be audited by the CB.</p> <p>This would result in</p> <ol style="list-style-type: none"> <li>A more reliable monitoring (for clients) whether FSC-certified timber once prescribed is actually applied (more reliable than the customer checking the invoices, where customers quite often lack the specific knowledge)</li> <li>Increased value for FSC-certified contractors, the FSC-certificate is now often seen as only a license to operate (or rather obtain contracts) without further obligations</li> </ol>
General	G	<p>Include additional reference to non-certified licence holders.</p>	<p>Non-certified trademark licence holders may request evidence letters or invoices to promote FSC certified products. FSC Certificate Holders shall provide the required information.</p>
General	G	<p>Include a diagram in the introduction or scope demonstrating that every link in the supply chain needs certifying.</p>	
General	G	<p>Add clarification of when products such as bamboo count as FSC inputs (i.e. when grown in the forest matrix) and how this is proven – e.g. could bamboo be a neutral material and a certified input depending on circumstances?</p>	
General	G	<p>Add clarification on the information that shall be contained in purchase orders to specify FSC certified materials</p>	

General	G	Add a flowchart before explanation of the different control systems to help certificate holders determine which applies to their organisation	Add flowchart
General	G	Organisations with audits late 2015 should be allowed to postpone audit, and be audited to the new standard Q1 2016.	
General	G T E	From my understanding every quality management system shall contain internal audit program and a control of corrective and preventive action It is time for FSC to also integrate a basic internal audit program into the 40-004. It is the basis of a well managed system. A company can apply the 40-004, 40-005 and 40-007 without having a internal audit program. It would fundamentally strengthen the whole FSC COC certification if the certificate holder himself would be required to at least annually perform internal audits.	The organisation shall conduct internal audits at least annually covering all requirements of the applied standards and establish corrective and preventive measures if required. A report on the internal audit shall be reviewed at least annually. The organisation's internal audit programme shall cover the subcontractor's activities.
General	G	V3-0 D1-0 is a highly creditable effort by the WG and PSU, to make a complex subject fairly easy to follow and apply in practice.  The cross-walk document was very helpful.  I have not examined the comments from economic chamber North America but it looks as if further clarifications will need to be negotiated.	
General	G	I understand the reasoning for more complicated rules, but all the paperwork, documentation (and changing documentation requirements every couple years) takes a lot of time on my part. We are considering dropping FSC certification because of the time commitment and cost. We know its value, but have to balance that with time & cost unfortunately. Anything you can do to simplify things and make it easier would be much appreciated!	
General	G	This document is simply too wordy ,often inconclusive, at worst contradictory to earlier statements.	Simplify the document
General	G	There is a lot of extraneous information included in the clauses that would serve a better purpose if addressed via an appendix at the back of the standard.	
General	E	Footnotes: When footnotes have the character of a standard clause they should become a standard clause or included in a standard clause. Proof is that the footnote on page 19 of the draft PDF is was not copied to the EXCEL file.	Include footnotes with the character of a standard clause in the clause not the footnote.
General	G	Due to the proposed significant changes to the standard it may be unrealistic to modify our process and input materials by January 2016.	Move the proposed change date out to 2017-18
General	E	Inconsistent font for "Complaint", "FSC Controlled Wood" and "Controlled Wood".	
General	T	Some of the FSC Interpretations of the FSC-STD-40-004 can still be included in the revised standard to reduce the number of interpretations. Currently there are too many interpretations which lead to inconsistent operation among different CBs and CHs. (Not everyone is aware of the interpretations)	Comprehensive review of the FSC interpretations ( <a href="https://ic.fsc.org/fsc-std-40-004-coc-certification.441-15.htm">https://ic.fsc.org/fsc-std-40-004-coc-certification.441-15.htm</a> ) should be done to check if any of them can be included into the revised standard to reduce the number of interpretations.
General		If the intent was to make the standard simpler and easier to implement, why are a needless or un-required changes being made to the standard? Small changes like including the claim period on the volume summary are	

General	G	Maintaining confidence in the system and declarations that companies make in regards to their FSC Certified products is very important and is needed to maintain confidence in the whole FSC structure. However, as the regulations are further tightened and the administrative functions are more demanding and especially where no real value is added will only encourage companies to drop their FSC Certification or discourage others from coming on board. There is currently 1 case where a supplier is dropping their certification in a region which will have an impact on some board manufacturers. Any modifications / changes to the requirements must also be looked at from a value added perspective.	
General	G	Opportunity	I feel that FSC should investigate the possibility of a joint venture with Considerate Constructors as they do a fantastic job improving the face of the construction Industry and would be a great opportunity to promote FSC. I am aware this is only applicable to the UK but feel that it could eventually go global
General	G		Put active links to all other standards and policies referenced.
General	G		Make an overall glossary (for all standards and policies) and make active link to the glossary and take the glossary out of each standard document.
General		Has FSC considered the impact that the proposed changes will have on existing CoC Holders (i.e., analysis/ cost projections on the impacts of the proposed changes)? Most certificate holders do not get much value for the FSC fibre (no premium, limited difference in market capture). The proposed changes will likely result in substantially increased costs to CoC Holders. Many CoC Holders are struggling to maintain their certificates as of now. Adding additional administrative burden will likely push many to the point of giving up their FSC certification. The proposed changes to the CoC system, coupled with the upcoming changes to the Controlled Wood requirements, will likely have very significant impacts (increased costs and admin) on certificate holders, as well as a significant reduction in the amount of FSC fibre available on the market (due to the Controlled Wood requirements).	
General	G	Thank you for having the possibility to comment on the revision of this standard. This draft if it will remain as it is it will have serious effects in the whole wood and plastics processing industries. Therefore we use the possibility for commenting and presenting the industries point of view.	
General	G	FSC OCP will not be accepted by the German Industry It is in contradiction to the existing legal provisions and means many risks for participating companies. OCP can't be supported at all.	Delete the OCP from all parts of the CoC standard.  Remain: The organization shall verify the validity and scope of the supplier's FSC certificate for any changes that might affect the availability and authenticity of the supplied products via <a href="http://info.fsc.org">http://info.fsc.org</a> .

General	E	Too much repetitive compliance work for companies that are certified. We have customized our accounting software, and have several different spreadsheets all with the same information but presented in different ways to comply with the standards. We are duplicating our effort and spending more time than we should.	Combine the annual volume summary data for each FSC product group and the volume accounting records into one procedure.
General	E	Some of the GC's we work for are still requiring us to send them copies of invoices	Require GC's to be educated on FSC standards if they are involved in the process.
General	G	There should be a NOTE, which refers to the current ISO CoC standardisation process. FSC contributes to that process as observer.	NOTE: Within ISO/PC 287/WG1 a project has started for the Chain of Custody of wood and wood-based products. The adaption of the ISO/DIS 19228 is foreseen in spring 2016. FSC will consider this ISO-Standard as a minimum requirement for the FSC chain of custody certification.
General		<p>4 and 5 (G/T) The main objective with the FSC is to contribute to a sustainable world via safeguarding of a sustainable use of the land and forests.</p> <p>For companies taking their societal responsibility and to be able to show this to "the world", the sustainable wood have to be traceable all along the supply chain, or chain of custody.</p> <p>As the focus is the arable production of wood, the certification system has been developed from this.</p> <p>Traceability along the supply chain has been developed from another perspective. You could say that it has been developed from the fact that business would like to charge the correct price for the identified article. Thus the article number was developed as a standard to be able to handle unique numbers to every single product. The use of electronic devices has even further showed the need for those unique numbers. GS1 system was developed as a global standard. This has simplified the movement of goods and the traceability of the goods all along the supply chain.</p> <p>This is not rocket science. Those business systems are well developed and known by all economic operator. You could link other properties to the articles i e FSC if you are aware of the article number of the approved articles.</p> <p>What we need to do is to link the FSC approved timber to the different articles that would be developed from this raw material. As different articles would be created/produced, all you have to know is the identity of the material down the supply chain.</p> <p>In Sweden the Swedish Forest Industry has already started to identify processed timber products through these numbers. We will be happy to provide You with any additional information You need.</p> <p>We strongly believe that taken it "the other way round", using the already developed business systems, it will be a "piece of a cake" to add the raw material in this system. What we have done is to develop a traceability system from a business point of view.</p> <p>We understand that there is an openness towards other ways to safeguard the traceability of the wood. We very much welcome this.</p>	
General approach on Chain of Custody standard	G	The FSC COC standard continues to be very prescriptive and insufficiently flexible to be applied by any timber or paper company.	Change this FSC COC "instruction" into a FSC COC risk-based standard. The company would have to identify the risk of mixing or substitution of FSC certified material in the process and apply appropriate Critical Control Points to prevent that. This would certainly help the companies to focus on the weak points rather than dealing with 36-pages standard just to find out that 50% of its content is

			not applicable for them!
Introduction	G	There is no explicit reference to Requirements for use of the FSC trademarks by Certificate Holders FSC-STD-50-001 (V1-2) EN FINAL VERSION in the standard when it comes to where readers should look, when searching for rules for promotional trademark use. There's only a reference to the standard under D and 10.1.3 (use of on product label)	Include a direct reference to FSC-STD-50-001 in the intro perhaps when it comes to rules for promotional use of FSC trademarks.
Introduction	T	The scope of the standard is to control volume flow from the forest to products sold with an FSC claim or labelled with the FSC trademarks.	Chain of custody (COC) is the path taken by products from the forest, or in the case of recycled materials from the reclamation site, to an organization that makes FSC claims or labels product with the FSC trademarks.
Introduction	E	Last sentence of second paragraph, "trustful" should be "truthful"	"truthful"
Introduction	G	It is a common belief that a chain of custody allows the origin of a piece of wood to be tracked right back to a particular tree stump or at least certified forest or CW supply area. The introduction to this CoC standard should say clearly what a CoC certificate does and does not demonstrate.  In my experience, CoC for retail paper does not demonstrate an unbroken chain; all the chains I have checked have been broken.	This is work for the PSU coordinator if not the CoC WG.  Paragraph 3 in section B on page 6 does not seem to be accurate.
Introduction	E	Trustful	Truthful (also noted by Jason Grant)
Introduction	E	3rd Paragraph – Management systems cannot provide any guarantees	"...management systems is designed to provide a credible "assurance" to..."
Introduction Table A	E	Why is FSC-STD-50-002 not included in this table as it is mentioned in the text as a somewhat important standard?	Add to Table A
Introduction; p. 4. Line2-3	E	redundancy	Take out "this is the case of" after (e.g... as e.g. already implies this. Instead state "(e.g. the case for Mexican...)"
Introduction;p .3,line24	E	clarification	All caps for the word "OR" in the line "1 AND either criterion 2 or 3 must be met"
Main Text	G	This document is simply too wordy ,often inconclusive, at worst contradictory to earlier statements.	Simplify the document
Motion 44	G	Motion 44 Improving access for small enterprises is not reflected in the draft. I cannot see any ground-breaking amendments for small companies.	Re-think the complexity and requirements of the COC standard with focus on small enterprises.
Part II	E	The title for part II is left aligned. Other titles are all centre aligned.	Centre align the title.
Part III	T	The discussion about the pre-consumer paper was done in a way that was not transparent enough. The consultation report (FSC-DIS-40-008) shows some concerns from stakeholders but no reason is provided for rejecting the concerns.  Usually, stakeholder consultations go round twice for any big changes. But this time, it was only done once with a form of discussion paper which is not a normative framework of FSC. Some stakeholders are not satisfied with the process for deciding this.	All stakeholders should be consulted again with all comments to the first discussion paper being provided. This time the consultation should be done in a normative way (rather than discussion paper).

Reason for revision	G	One of the main reasons for the revision of the standard was defined as "Simplification". I can hardly find any simplification in the draft. It is much longer and more detailed and complicated than ever.	Generally re-think the draft with focus of the intention and aim of the standard. E. g. simplification of FSC claims would lower the risk of non-compliance and misuse (why is "FSC Mix Credit" not called "FSC Mix 100%"? Do we really need three different FSC labels? ...). Better training of auditors with focus of the aim and intention of the criteria would help. Maybe an explanation of the aim and intentions in a separate document could be a way to simplify and shorten the standard?
References	G	FSC-STD-50-002 which is referenced elsewhere should be added to this list.	Add FSC-STD-50-002 here.
Scope	G	Companies producing products that are not eligible for FSC certification because these are made of e.g. plastic, metal or are beverages, are not covered in the scope of the FSC CoC standard. Such companies are therefore not FSC CoC certified. Nevertheless such companies use FSC certified and labeled packaging / beverage cartons to package their products. These finished packed products are sold to retailers. As the Chain of Custody is now disconnected (the retailer buying products from a non FSC certified company) and not conforming with the FSC CoC standard, the retailer cannot make any commercial FSC claims for the products packed with FSC certified and labeled packaging in catalogs, brochures, etc.	
Scope	G	Companies producing products that are not eligible for FSC certification because these are made of e.g. plastic, metal or are beverages, are not covered in the scope of the FSC CoC standard. Such companies are therefore not FSC CoC certified. Nevertheless such companies use FSC certified and labeled packaging / beverage cartons to package their products. These finished packed products are sold to retailers. As the Chain of Custody is now disconnected (the retailer buying products from a non FSC certified company) and not conforming with the FSC CoC standard, the retailer cannot make any commercial FSC claims for the products packed with FSC certified and labeled packaging in catalogs, brochures, etc. As part of the revision of the CoC standard, FSC should consider to enable retailers to make FSC claims in advertising for products that have FSC certified packaging e.g beverage cartons, but have not been acquired from an FSC CoC certified company e.g. juice factory, dairy. FSC should consider developing a desk and document based simple but secure "one step back" procedure for retailers without requiring e.g. juice factories, dairies, etc. to get FSC CoC certified.	
Scope	G	Companies producing products that are not eligible for FSC certification because these are made of e.g. plastic, metal or are beverages, are not covered in the scope of the FSC CoC standard. Such companies are therefore not FSC CoC certified. Nevertheless such companies use FSC certified and labeled packaging / beverage cartons to package their products. These finished packed products are sold to retailers. As the Chain of Custody is now disconnected (the retailer buying products from a non FSC certified company) and not conforming with the FSC CoC standard, the retailer cannot make any commercial FSC claims for the products packed with FSC certified and labeled packaging in catalogs, brochures, etc. As part of the revision of the CoC standard, FSC should consider to enable retailers to make FSC claims in advertising for products that have FSC certified packaging e.g beverage cartons, but have not been acquired from an FSC CoC certified company e.g. juice factory, dairy. FSC should consider developing a desk and document based simple	

		but secure “one step back” procedure for retailers without requiring e.g. juice factories, dairies, etc. to get FSC CoC certified.	
Scope	E	The word guarantee is too strong a promise and unrealistically raises expectations of 100% compliance	Change to assurance
Scope	T	<p>This is the section of the COC standard where who has to get FSC-certified (and who does not) gets established. It is particularly important to clearly define where the chain of custody ends since there has been significant confusion about this in the past. The key section is as follows:</p> <p>“For a product to be claimed as FSC certified (through a product label and/or sales documentation), there must be an unbroken chain of certified organizations covering every change in legal ownership of the product from the certified forest up to the point where the product is finished and FSC labelled or sold to the end consumer. Chain of custody certification is therefore required for all organizations in the supply chain of forest-based products that have legal ownership of certified products and perform at least one of the following activities:</p> <p>a) Process or trade certified products;  b) Apply the FSC label on products;  c) Pass on the FSC claim to subsequent customers through sales documents  d) Promote FSC-certified products, except finished and FSC labelled products that may be promoted by non-certificate holders (e.g. retailers) according to FSC-STD-50-002”</p> <p>Several problems remain here. The key term “end consumer” remains undefined in section E, “Terms &amp; Definitions.” Point d) above makes suggests that retailers will continue to be exempted from COC requirements, but a) contradicts this.</p> <p>The big questions remain: 1) what qualifies a company as a “retailer” (given that the term is also not defined in section E); and 2) is the standard going to try to require custom woodworkers, builders, flooring installers, and other contractors/sub-contractors who do not pass on FSC claims to get FSC-certified?</p> <p>Section E does offer a new (and largely useful) definition of the key term “Finished product”: “Product that receives no further transformation in terms of processing, labelling, or packaging prior to its intended end use or sale to the end-consumer. Cutting consumer-ready products into size (i.e. by retailers) and products [sic] installation are not considered product transformation, unless these activities involve repackaging, changing of the product composition, or relabeling.”</p> <p>This language suggests that semi-finished products like softwood lumber, softwood plywood, decking, and unfinished solid flooring that are FSC-certified but generally are not labelled are considered “finished products” by FSC, and that installers of these products do not need FSC CoC to claim them as FSC-certified, e.g. for a LEED project. It further suggests that semi-finished products like hardwood</p>	<p>If the intention is to exempt retailers (many of whom in fact sell both to homeowners/the general public as well as to professional builders/installers) from having to get COC unless they make FSC claims on invoices, and also to exempt builders/installers who do not make FSC claims, then I suggest the following amended language:</p> <p>“In order for an organization to claim a product as FSC certified (through a product label and/or sales documentation), there must be an unbroken chain of certified organizations covering every change in legal ownership of the product from the certified forest to the organization making the claim. Chain of custody certification is therefore required for all organizations in the supply chain of forest-based products that have legal ownership of certified products and perform at least one of the following two activities:</p> <p>a) Process or trade certified products AND apply the FSC label on products OR pass on the FSC claim to subsequent customers through sales documents  b) Promote FSC-certified products, except finished and FSC labelled products that may be promoted by non-certificate holders (e.g. retailers) according to FSC-STD-50-002”</p>



		lumber and hardwood plywood that require further processing by custom woodworkers before they are installed on a project jobsite are NOT considered “finished products” by FSC, and that custom woodworkers do need FSC CoC to claim them as FSC-certified for a LEED project or other purposes. If this is true, it would be nice if the standard were to make this clearer.	
Scope	T	Operations covered by this standard needs to be clarified as it applies to the secondary sector for primary and secondary manufacturing and how it would apply to outsourced manufacturing. We have had questions raised by our certification bodies whether an outsourced manufacturing site should be included within our scope of the chain of custody certificate or was required to have its own chain of custody certification in place.	Need to incorporate language or add a note to the effect that the “outsourced manufacturer is provided the raw materials by a chain of custody certified organization and does not have legal ownership of the certified products is not required to have its own chain of custody certification.”
Scope	T	Second paragraph, under B (scope) list item (d) Is the clause in item D meant to imply that retailers can sell items as FSC-certified (with a claim/label) or rather that they can promote selling FSC-certified items under FSC-STD-50-002? This is an r point for retailers who want to sell items that can be counted for LEED points in the U.S.	Clarify this clause – what does it actually mean?
Scope	G	Companies producing products that are not eligible for FSC certification because these are made of e.g. plastic, metal or are beverages, are not covered in the scope of the FSC CoC standard. Such companies are therefore not FSC CoC certified. Nevertheless such companies use FSC certified and labeled packaging / beverage cartons to package their products. These finished packed products are sold to retailers. As the Chain of Custody is now disconnected (the retailer buying products from a non FSC certified company) and not conforming with the FSC CoC standard, the retailer cannot make any commercial FSC claims for the products packed with FSC certified and labeled packaging in catalogs, brochures, etc.	
Scope	E	Following sentences can be sorted to be simpler (I suggest removing the latter sentence which is basically saying the same thing as the former sentence): This standard specifies the management and production requirements for chain of custody control with respect to sourcing, labelling (where applicable), and sale of products as FSC certified, thereby providing a range of options for making FSC claims. The standard also specifies the control requirements that, if successfully implemented, allow organizations to sell and label products as FSC 100%, FSC Mix, or FSC Recycled, or to sell materials as FSC Controlled Wood.	This standard specifies the management and production requirements for chain of custody control with respect to sourcing, labelling (where applicable), and sale of products as FSC certified, thereby providing a range of options for making FSC claims.
Scope	G	Companies producing products that are not eligible for FSC certification because these are made of e.g. plastic, metal or are beverages, are not covered in the scope of the FSC CoC standard. Such companies are therefore not FSC CoC certified. Nevertheless such companies use FSC certified and labeled packaging / beverage cartons to package their products. These finished packed products are sold to retailers. As the Chain of Custody is now disconnected (the retailer buying products from a non FSC certified company) and not conforming to the FSC CoC standard, the retailer cannot make any commercial FSC claims for the products packed with FSC certified and labelled packaging in catalogues, brochures, etc.	As part of the revision of the CoC standard, FSC should consider to enable retailers to make FSC claims in advertising for products that have FSC certified packaging e.g. beverage cartons, but have not been acquired from an FSC CoC certified company e.g. juice factory, dairy. FSC should consider developing a desk and document based simple but secure “one step back” procedure for

			retailers without requiring e.g. juice factories, dairies, etc. to get FSC CoC certified.
Scope	T	The scope only deals with virgin material and does not consider reclaimed material in that it assumes a CoC to the forest rather than back to the reclamation site.	Needs addition of... 'or reclamation site' or similar.
tables	E	Page 15,19,20,22,23,25,29, 31 There are 8 tables describing FSC Claims, FSC Input, FSC control systems and FSC labelling. They describe similar or even the same things but in different ways.	Try to fit the information from the 8 tables into less than 8 tables
tables	E	Page 15,19,20,22,23,25,29, 31 There are 8 tables describing FSC Claims, FSC Input, FSC control systems and FSC labelling. They describe similar or even the same things but in different ways.	Try to fit the information from the 8 tables into less than 8 tables
Tables in general	G	I think that generally the tables and pictures you inserted are helpful, but should be moved to an informative annex. We need a standard that is clear and focuses on requirements, not on guidance and helpful information - which is distracting. An annex is the best place for information which is not necessary but can help "first timers".	Concentrate tables and illustrations in an informative annex.
Assembled Products	T	Packaging products are not included in the assembled products definition.	Change last sentence: Laminated particleboard, and packaging or printed materials containing different paper components.
Assembled Products	T	The current definition of assembled products includes materials which are not considered by industry as an 'assembled product', but instead a value-added operation to a base product, like in the case of melamine faced wood-based panels. As a general rule, these products as covered with a melamine impregnated decorative paper in industrial lines which are integrated in the same sites as the wood-based panels' production. Applying the new proposed requirements for assembled products (i.e. within the credit system requirements) will just generate an excessive and unjustified overburden to these products, when addressing the management of credits for melamine impregnated paper. It should be noted that this type of paper was accepted until recently as a minor component, and no further control was felt necessary. Nothing has changed since then regarding any risks into FSC.	Exclude 'laminated particleboard' and any other melamine paper faced wood-based panels from the definition of assembled products.
Assembled Products	T	Packaging materials (cardboard) are not included in the assembled products definition.	Change the last sentence in the definition to, "Laminated particleboard, and packaging or printed materials containing different paper components."
Chain of Custody	T	See comment above	The path taken by raw materials, processed materials, finished products, and co-products from the forest an organization that makes FSC claims or labels product with the FSC trademarks or (in the case of reclaimed/recycled materials or products containing them) from the reclamation site to an organization that makes FSC claims or labels

			product with the FSC trademarks
Chain of Custody	E	The definition of “chain of custody” should be “...from the forest to the final product” and not to the consumer as the chain of custody stops with the production of the item.	The path taken by raw materials, processed materials, finished products, and co-products from the forest to the final product
Chain of Custody	T	Definition of “Chain of Custody” is very important because it also clarifies where the certified COC ends. It is defined as “... to the consumer”.	The certified COC usually ends with the finished product. Therefore change it to “... to the finished product”. Anyway, then it has to be clarified if a wholesaler of finished products needs to be certified or not.
chip and fibre products	E	Change the word “defibrillated” to	...”defibrated”
chip and fibre products	E	Change the word “defibrillated” to	...”defibrated”
Claim-contributing input	G	Why this excludes pre-consumer reclaimed wood or even other NTFP such as cork?	c) Pre-consumer reclaimed materials
Claim-contributing input	G	Why this excludes pre-consumer reclaimed wood or even other NTFP such as cork?	c) Pre-consumer reclaimed materials
Claim-contributing input	G	Good concept.	-
Claim-contributing input	G	By excluding pre-consumer wood RESIDUALS under the claim contributing input you have taken away a valuable stream of material that when combined with FSC wood residuals would allow your certification to be used on more household products. This would reduce the amount of residuals currently being used for burning in the form of boiler fuel, pellets or bio-mass. Today, we cannot secure enough FSC sawdust to meet current European demand for our product. As stated, we are purchasing the residuals and our supplier’s focus is not on getting their sawdust/shavings certified, it is on meeting the customer requirements on their finished good. In speaking to other manufacturers of wood products using residuals, they encounter the same issue and are now looking at grasses as a replacement for wood to get around the FSC requirement. This is not the direction Bemis would like to take. Rather, we would like to work with FSC to resolve the issue to the best of everyone’s interest. If you think about the very nature of wood residuals, asking a secondary producer to separate by species and certified/non-certified their sawdust, chips, shavings would be a logistical nightmare. Because the material we purchase comes from well-managed Midwestern States in America. Bemis is all about sustainability and it is our hope FSC will consider working with us to include Pre-Consumer wood in the claim contributing input. As a point of reference, Bemis purchased 35,000+ tons of wood residuals in 2014.....and we have been using wood residuals for the past 75+ years. Thank you for your time and consideration.	Add wood residuals into the pre-consumer definition for claim contributing inputs.
Claim-contributing input	G	The use of pre-consumer paper is a good decision. This regulation should be applied to the pre-consumer reclaimed wood, use for the production of wood-based materials. Production-waste is a valuable raw material. A different treatment for pre-consumer reclaimed paper and pre-consumer reclaimed wood is not understandable	c) pre-consumer material

Claim-contributing input	G	<p>Terms and Definitions, "claim contributing input" c)</p> <p>The category pre-consumer reclaimed wood should be examined before publication of the FSC-STD-40-004 V3.0 and the category should be treated with the same claim contribution value as pre-consumer reclaimed paper or an explanation should be included into the standard why it is treated differently. Otherwise there will be confusion at company level why pre-consumer reclaimed paper is seen differently than pre-consumer reclaimed wood materials! Users of pre-consumer reclaimed wood materials might think their concerns are not treated equal to the concerns of users of pre-consumer reclaimed paper materials.</p>	Implementation on a study about pre-consumer reclaimed wood materials and integration of results into the new standard.
Claim-contributing input	G	<p>CEPI welcomes the inclusion of pre-consumer reclaimed paper as claim contributing input being equivalent to post-consumer material and certified virgin fibre.</p> <p>It is no longer necessary to particularly incentivise post-consumer reclaimed paper fibres, since collection has reached very high levels. On the contrary it is important to support the collection and use of all kinds of reclaimed paper fibres to produce high quality paper from reclaimed fibres while the consumption of "easy to recycle" paper grades is decreasing it's relative weight partly due to use of electronic media.</p>	
Claim-contributing input	G	<p>Introduction, E, note for stakeholders, p. 8</p> <p>CEPI encourages FSC to carry out a study on evaluating alternatives for best valuing pre-consumer reclaimed wood materials in the FSC system with recommendations on changing the classification of pre-consumer reclaimed wood</p>	
Claim-contributing input	G	<p>CEPI welcomes the inclusion of pre-consumer reclaimed paper as claim contributing input being equivalent to post-consumer material and certified virgin fibre.</p> <p>It is important to support the collection and use of all kinds of reclaimed paper fibres to produce high quality paper from reclaimed fibres.</p>	
Claim-contributing input	G	<p>note for stakeholders</p> <p>CEPI encourages FSC to carry out a study on evaluating alternatives for best valuing pre-consumer reclaimed wood materials in the FSC system with recommendations on changing the classification of pre-consumer reclaimed wood</p>	
Claim-contributing input	T	<p>This is a positive step which we support.</p> <p>There is a risk of confusion if this change is limited to only "paper" fibres. It would simplify and promote recycling if "c" was opened up to include all fibre based products, including pulp, board and paperboard etc . It would be a further logical extension to include pre-consumer timber products.</p>	Change paper to all forest products.
Claim-contributing input	G	<p>CTIB welcomes the addition of the clause concerning pre-consumer reclaimed paper in claim-contributing input due to differentiation difficulties between real post-consumer paper and production waste.</p>	
Claim-contributing input		<p>This is a positive for the system as a whole. This will give the appropriate value to all recycled components. From an environmental standpoint, there is no justification for a differentiation between pre and post-consumer fiber. The use of both lessens demand on virgin fiber.</p>	
Claim-contributing input		<p>It is very good, that pre and post consumer reclaimed paper are considered equal. This makes it much more easier for paper mills</p>	
Claim-contributing input	G	<p>ETS encourages FSC to carry out a study on evaluating alternatives for best valuing pre-consumer reclaimed wood materials in the FSC system with recommendations on changing the classification of pre-consumer reclaimed wood</p>	

Claim-contributing input	G	Evergreen Packaging supports the inclusion of pre-consumer reclaimed paper into the definition of "Claim-contributing Input" and believes that this will improve the market for pre-consumer material.	
Claim-contributing input	G	We strongly support the decision to grant pre-consumer paper fibre the same value as post-consumer material and as certified virgin fibre.	
Claim-contributing input	G	We consider it very important that FSC evaluates the role of pre-consumer reclaimed wood materials as it did with pre-consumer paper fibre.	
Claim-contributing input	T	Concerning claim contributing material: There are difficulties to distinguish between pre- and post-consumer timber, e.g. furniture that was damaged through storage or furniture from household collection:	C) Pre-consumer reclaimed material
Claim-contributing input	G	FSC Russia supports the inclusion of "pre-consumer reclaimed paper" as an input material in the text of the standard. This initiative enlarges the list of the input materials thus enhances possibilities for certificate holders, if applicable for them.	No change required
Claim-contributing input	G	The proposed changes for including pre-consumer reclaimed paper fiber as a claim-contributing input appear to be generally supported in North America. This is one of the most anticipated changes for certificate holders in the standard revision. The discussion paper and synopsis of comments also show support for the revaluing of pre-consumer reclaimed paper fiber as a claim-contributing input. However, there are some concerns about how this change will align with government sourcing guidelines in the US. With this change, products which hold the FSC Recycled claim and/or label will no longer default to meeting US government sourcing guidelines. Therefore, additional information regarding post-consumer content will need to be provided between the supplier and the customer, whether it be by an additional claim beside the label or an additional claim on business to business correspondence.	Determine if there are similar government sourcing guidelines in other parts of the world where alignment may be affected by the change in pre-consumer reclaimed paper fiber to a claim-contributing input.  It would be helpful for FSC to outline the proposed methods to make such claims and whether these claims should be audited during the FSC certification system for accuracy.
Claim-contributing input	E	We generally appreciate the use of pre-consumer reclaimed paper as claim-contributing input. Anyway we think that pre-consumer material originating from the process of production of wood based panel products, should similarly be considered as claim-contributing and should clearly be separated from other co-products.	c) pre-consumer reclaimed material. (note: this category excludes co-products)
Claim-contributing input	E	Pre-consumer reclaimed wood should be handled in the same way like reclaimed paper. The necessary study should be initiated. Off cuts from production waste is a high grade feedstock	c) pre-consumer reclaimed material. (note: this category excludes co-products)
Claim-contributing input	E	The differentiation between pre-consumer and post-consumer reclaimed material should be given up.	
Claim-contributing input	T	1. We welcome the stipulation that pre-consumer recycling paper is now considered as claim contributing material. 2. The same stipulation should apply also in the case of pre-consumer reclaimed timber waste in the case of production of fiber boards and other panels. Such production waste material (such as waste from cutting to size activities) is a valuable pre-consumer raw material, which can be distinguished clearly from co-products. Therefore a different treatment of pre-consumer material in paper and in timber panel production is not justifiable.	
Claim-contributing input	G	We agree with Pre-consumer paper fiber as being a claim contributing input. The wording has been placed within appropriate sections of the standard.	None
Claim-contributing input	E	We generally appreciate the use of pre-consumer reclaimed paper as claim-contributing input. Anyway we think that pre-consumer material originating from the process of production of wood based panel products, should similarly be considered as claim-contributing and should clearly be separated from other co-products.	c) pre-consumer reclaimed material. (note: this category excludes co-products)

Claim-contributing input	E	<p>“Claim-contributing Input” definition is confusing: It does not describe the “claims”: d) pre-consumer reclaimed wood e) FSC Controlled Wood and in other places I see these two categories as referred to as non-claim (see below). I do not understand: I understand that in B2B claims one can sell “FSC CW” for example, and both d) and e) are legitimate additions to FSC certified materials, so why are they not “claim-contributing”.</p> <p>I think this is going to create misunderstandings.</p>	
Claim-contributing input		I support the inclusion of pre-consumer reclaimed paper as a claim-contributing input.	
Claim-contributing input	T	We support the inclusion of c) Pre-consumer reclaimed paper as a claim-contributing input	
Claim-contributing input	G	We strongly support the decision to grant pre-consumer paper fibre the same value as post-consumer material and as certified virgin fibre.	
Claim-contributing input	G	We consider it very important that FSC evaluates the role of pre-consumer reclaimed wood materials as it did with pre-consumer paper fibre.	
Claim-contributing input	G	We strongly support the decision to grant pre-consumer paper fibre the same value as post-consumer material and as certified virgin fibre.	
Claim-contributing input	G	We consider it very important that FSC evaluates the role of pre-consumer reclaimed wood materials as it did with pre-consumer paper fibre.	
Claim-contributing input	G	We strongly support the decision to grant pre-consumer paper fibre the same value as post-consumer material and as certified virgin fibre.	
Claim-contributing input	G	We consider it very important that FSC evaluates the role of pre-consumer reclaimed wood materials as it did with pre-consumer paper fibre.	
Claim-contributing input	G	<p>The use of pre-consumer paper is a good decision. This regulation should be applied to the pre-consumer reclaimed wood, use for the production of wood-based materials. Production-waste is a valuable raw material. A different treatment for pre-consumer reclaimed paper and pre-consumer reclaimed wood is not understandable</p>	c) pre-consumer material
Claim-contributing input	T	<p>The inclusion of pre-consumer paper as a claim contributing input will be welcomed by the paper and print industry, and is supported by the Rainforest Alliance.</p> <p>We recognize that a discussion paper has been written and consulted on valuing pre-consumer reclaimed paper as a claim contributing input and one has not been done on pre-consumer wood. However, this alone is not sufficient reason to value only pre-consumer paper and ignore pre-consumer wood.</p>	FSC should conduct a study to evaluate the value of pre-consumer reclaimed wood, as was done for pre-consumer reclaimed paper. The conclusions and consultation of such a study will determine the need (or lack thereof) to limit the claim contributing input definition to pre-consumer reclaimed paper with justification.
Claim-contributing input	G	We strongly support the inclusion of Pre-Consumer reclaim material as claim contributing input.	
Claim-contributing input	E	We generally appreciate the use of pre-consumer reclaimed paper as claim-contributing input. Anyway we think that pre-consumer material originating from the process of production of wood based panel products, should similarly be considered as claim-contributing and should clearly be separated from other co-products.	c) pre-consumer reclaimed material. (note: this category excludes co-products)

Claim-contributing input	G	We support the recognition given pre-consumer fiber as a claim-contributing input. This addition recognises the contribution of this source on the environment and the sustainability of our world's wood resources. However, this recognition has only been extended to pre-consumer fiber in paper manufacturing. The revised standard needs to broaden the scope of this change to include pre-consumer fiber as a claim-contributing input in the manufacture of composite panels (i.e. particleboard and MDF). This would extend the benefit of this change to an industry that is currently limited in the availability of FSC qualified inputs and expand the reach of the associated markets for FSC certified panels.	FSC should recognize pre-consumer fiber used in production of composite panels the same way that it does for pre-consumer fiber in paper production.
Claim-contributing input	E	The definition of "claim contributing impact" should also include wood chips from the sawn log industry which are used as preconsumer recycled content in the paper manufacturing	d) Pre-consumer reclaimed wood (e.g. wood chips)
Claim-contributing input	G	We understand that the pilot for this topic was developed for the paper case, but the rationale for the wood-based pre-consumer reclaimed material is exactly the same. FSC should include the materials that follow the same principle, instead of creating exceptions which will be difficult to understand and justify. In case a separate study is necessary to implement this, Sonae Indústria if fully available to cooperate in such work.	Remove the note with the exclusion of pre-consumer reclaimed wood.
Claim-contributing input	G	I agree that pre-consumer recycle should be considered the same as postconsumer content.	None
Claim-contributing input	G	We strongly support the decision to grant pre-consumer paper fibre the same value as post-consumer material and as certified virgin fibre.	
Claim-contributing input	G	We consider it very important that FSC evaluates the role of pre-consumer reclaimed wood materials as it did with pre-consumer paper fibre.	
Claim-contributing input	T	The term "Claim-contributing input" is much more complicated than it has to be.	Rename "Claim-contributing input" to "accountable" or "creditable".
Claim-contributing input	G	UPM strongly supports the decision to grant pre-consumer reclaimed paper the same value as post-consumer material and as certified virgin fibre.	
Claim-contributing input	G	UPM encourages FSC to carry out a study on evaluating alternatives for best valuing pre-consumer reclaimed wood materials in the FSC system with recommendations on changing the classification of pre-consumer reclaimed wood	
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Claim-contributing input	G	UPM encourages FSC to carry out a study on evaluating alternatives for best valuing pre-consumer reclaimed wood materials in the FSC system with recommendations on changing the classification of pre-consumer reclaimed wood	
Claim-contributing input	T	Claim contributing Input – specifically Pre-consumer reclaimed wood: how does sawdust and shavings fit into this definition? Sawdust and shavings are typical by-products from secondary manufacturing (not primary). They should be considered an eligible pre-consumer input that can be used towards claims. The scenario with sawdust and shavings is very similar to that of pre-consumer paper fibre. There is negligible difference. If additional studies/ surveys are required to clarify the situation with regard to the eligibility of sawdust and shavings, they should continue to be considered eligible inputs for claims until the study is completed (for parity with the paper industry).	Clarify that sawdust and shavings (fibre) is considered an eligible pre-consumer input that can be used towards claims.
Claim-contributing	E	Include production residuals as a pre-consumer input as well. All production processes create waste to some degree. Incentivize the	All residual fiber materials are valued as FSC inputs.

input		use of the by-products by including them as FSC certified.	
Claim-contributing input	E	We generally appreciate the use of pre-consumer reclaimed paper as claim-contributing input. Anyway we think that pre-consumer material originating from the process of production of wood based panel products, should similarly be considered as claim-contributing and should clearly be separated from other co-products.	c) pre-consumer reclaimed material. (note: this category excludes co-products)
Claim-contributing input	G	Claim contributing input: We appreciate FSC's decision to include Pre-consumer paper as claim contributing input	
Claim-contributing input	G	c) Pre-consumer reclaimed paper (note: this category excludes pre-consumer reclaimed wood). à The new category is a case of unequal treatment of the paper and wood based products industry. The usage of reclaimed paper is not more or less ecological as the usage of pre-consumer reclaimed wood (for example chip board residues from the furniture industry that are used in for the production of new chipboards). We refer to the new classification of pre-consumer paper and require to initiate a study which also changes the classification of pre-consumer reclaimed wood. Off cuts from production waste are high grade feedstock for the wood panel industry.	Please use only the term "pre-consumer material" or change the standard in the sense, that each usage of reclaimed material is equal than certified input.
Claim-contributing input	G	The distinction between pre-consumer and post-consumer reclaimed material should should be abandoned.	
Claim-contributing input	G	ETS welcomes the inclusion of pre-consumer reclaimed paper as claim contributing input being equivalent to post-consumer material and certified virgin fibre. Recycled paper is reducing in volume due to the reduction of the graphic industry being replaced by electronic media, therefore incentivising the collection of all paper for reuse is essential.	
claim period or job order	E	The term "claim period or job order" is used several times but not defined.	Please add "claim period or job order" together or separately in the Terms and definitions and perhaps in a note, when applied in the standard, for instance in 5.2.3 and 7.4.1
complaint	E	It is unclear what the reference to supplier means in context of this definition. Is the definition is attempting to clarify that complaints can actually come from suppliers, not just clients? Additionally, the way the definition is currently written implies that the person or organization is related to the organization's conformity only. However, it seems as though the complaint could come from anyone, not just those related to it's conformity.	Therefore, a suggested revision to the definition is: An expression by any person or organization of dissatisfaction in relation to the organization's conformity with this standard.
complaint	G	It is unclear what the reference to supplier means in context of this definition. It may not make sense that a client can complain to an organization about their supplier's conformance with this standard. However, perhaps the definition is attempting to clarify that complaints can actually come from suppliers, not just clients. Additionally, the way the definition is currently written implies that the person or organization is related to the organization's conformity only. However, it seems as though the complaint could come from anyone, not just those related to it's conformity.	A suggested revision to the definition is: An expression by any person or organization of dissatisfaction in relation to the organization's conformity with this standard.
complaint	G	Thank you for adding a very clear definition of what constitutes a complaint.	None



complaint	G	This definition needs more work and clarity. The standard needs to be explicitly clear, as an expression of dissatisfaction needs to be formally provided in writing and should be supported by facts and documentation and have some seriousness. Otherwise, it may become unmanageable. For example, an "expression of dissatisfaction" could be interpreted to be simply a public statement, without being a definitive complaint directed to the certificate holder. The definition must be explicitly clear as to what constitutes a complaint is in order to ensure consistency and clarity. Editorial: Use of the word organization three times could be confusing. For example, the "organization" should be changed to "certificate holder."	
complaint	T	It is unclear what the reference to supplier means in context of this definition. It may not make sense that a client can complain to an organization about their supplier's conformance with this chain of custody standard.	Complaints should come from suppliers, customers and other parties relating to the organization chain of custody.
contracting organization	T	This term does not state "third party" in the way that the definition of "outsourcing" is proposed to do, and these definitions should be aligned.	See Outsourcing Definition comments
Contracting organization & Contractor	G	These terms do not state "third party" in the way that the definition of "outsourcing" is proposed to do below, and these definitions should be aligned.	Clarify and align definition: - Contracting organization - Contractor - Outsourcing
Contractor	T	Contractors which do not change the material in any way (no processing, no re-packaging) are not relevant for the intention of COC certification. The description of the Scope of the standard (B) clearly defines that certification is not necessary for "Logistics companies transporting or temporarily storing certified products"	Clarify that contractors for transporting or temporarily storing certified products without any changes of the product or its packaging are not affected by the term "contractor".
controlled material	G/T	Controlled material shall not be deleted since this is a very important aspect of sourcing Keep the definition.	Controlled material Virgin material originating in non FSC-certified forests or plantations from suppliers included in the verification program of organizations certified according to FSC-STD-40-005
controlled material	G/T	Controlled material shall not be deleted since this is a very important aspect of sourcing Keep the definition.	Controlled material Virgin material originating in non FSC-certified forests or plantations from suppliers included in the verification program of organizations certified according to FSC-STD-40-005
controlled material	G/T	Controlled material shall not be deleted since this is a very important aspect of sourcing Keep the definition.	Controlled material Virgin material originating in non FSC-certified forests or plantations from suppliers included in the verification program of organizations certified according to FSC-STD-40-005
controlled material	G/T	Controlled material shall not be deleted since this is a very important aspect of sourcing Keep the definition.	Controlled material Virgin material originating in non FSC-certified forests or plantations from suppliers included in the verification program of organizations certified according to FSC-STD-40-005
controlled material	T	The definition for "controlled material" was deleted which is not understandable because it is a relevant term (which still exists in the standard, e. g. definition of "eligible input").	Do not delete definition of "controlled material".

controlled material	G/T	Controlled material shall not be deleted since this is a very important aspect of sourcing Keep the definition.	Controlled material shall not be deleted since this is a very important aspect of sourcing Keep the definition.
controlled material	G/T	Controlled material shall not be deleted since this is a very important aspect of sourcing Keep the definition.	Controlled material shall not be deleted since this is a very important aspect of sourcing Keep the definition.
controlled material	G/T	Controlled material shall not be deleted since this is a very important aspect of sourcing Keep the definition.	Controlled material shall not be deleted since this is a very important aspect of sourcing Keep the definition.
controlled material	T	Definitions: No Clear Definition of Controlled Material to assist with quarantine of inbound wood supplies lacking a credential which is delayed due to transaction logistics. Controlled Material should be instantiated as a defined product state. Controlled Material is wood which has yet to be tied to a risk assessment through an acceptable means but is expected to be credentialed. Controlled Material is converted to Controlled Wood through a tie out with the proper corresponding national CW risk assessment. Controlled Material cannot be allowed into the process until it has the credentials required to make the tie out at which point, the material becomes Controlled Wood.	Consider adding a definition that helps us manage the concept of quarantine of material thought to be controlled but lacking the necessary paperwork to be cleared. Controlled Material is quarantined until it has the necessary credentials to tie it out satisfactorily to a risk assessment. Or, consider adding a definition of uncontrolled wood to the definition and approach it from that direction.
controlled material	T	The term controlled material was removed from this section as well as in the definition of material category. Controlled material or controlled wood should be kept as a material category. The term Controlled wood or controlled material distinguishes the material category from the claim FSC Controlled Wood. In the proposed version 3.0 of FSC-STD-40-005, controlled wood is defined.  FSC needs to be consistent with its terms and definitions between standards.	Controlled Wood: material that has been assessed to be in conformance with the requirement of the standard FSC-STD-40-005 Requirements for sourcing Controlled Wood or the requirement of the standard FSC-STD-30-010 Forest management requirements for Controlled Wood certification to avoid 'unacceptable' sources.  FSC Controlled Wood: Material with an FSC claim supplied by a supplier which has been assessed by an FSC-accredited certification body for conformance with Controlled Wood requirements according to the standard FSC-STD-40-005 Requirements for sourcing Controlled Wood or FSC-STD-30-010 Forest management requirements for Controlled Wood certification.  Source FSC-STD-40-005 v 3.0, draft 2-0.
conversion factor	E	Conversion factor: The last sentence. How to calculate the conversion factor is better described in 5.3 or somewhere in 9.1	Remove the last sentence and put it under a new 5.3.2 or in chapter 9.1 Also include an illustration how you calculate the conversion factor.
conversion factor	E	Conversion factor: The last sentence. How to calculate the conversion factor is better described in 5.3 or somewhere in 9.1	Remove the last sentence and put it under a new 5.3.2 or in chapter 9.1 Also include an illustration how you calculate the conversion factor.
co-product	E	Co-product – 'depending on the material'	'according to the material' is better

			English
co-product	E	Definition “co-product” should be more precise as this correlates directly with the definition of pre consumer reclaimed material.	Material intentionally produced during the process of primary manufacturing of another (principal) product from the same input. Intentionally can be referenced by the relation of purchasing price and selling price. Such materials are, for the purposes of this standard, classified depending on the material category from which they are co-produced
co-product	T	The word “By-product” is more often used than “Co-product”. The word By-product is also used by the EU directives.	Replace the word “Co-product” with “By-product”
co-product	T	The word “By-product” is more often used than “Co-product”. The word By-product is also used by the EU directives	Replace the word “Co-product” with By-“product”
concession of harvest	G	Missing – concession of harvest (clause 12.2.1 Note on page 35; end consumer; retailer; substitution; unfinished product (clause 6.1.3c)	
Delivery Documents		With the ever increasing popularity of digital documents and system automation (packing slips, invoices etc) why is there still such a reliance / requirement to have copies of delivery documents when a subsequent, approved document (such as an invoice in any format such as MS excel) should be able to be sufficient enough to meet the criteria required?	Changing the requirement to include a variety of other documents or formats of documents such as a report indicating delivery dates etc.
ecoregion	G	Definition of “Ecoregion” (9.1.3 b) is missing	Add definition of “ecoregion” to E, Terms and Definitions
ecoregion	G	Definition of “Ecoregion” is missing	
eligible input	E	Eligible input The table is helpful to get an overview.	Eligible input Keep the table; at least as a Note
eligible input	E	Eligible input The table is helpful to get an overview.	Eligible input Keep the table; at least as a Note
eligible input	G	This is a very important and helpful concept which should be more explicitly defined here. A list or table (like v.2-1) is desirable.	Definition or table should include fiber derived from non-timber forest products such as bamboo or palm supplied with an FSC claim as an eligible input.
eligible input	E	Eligible input The table is helpful to get an overview.	Eligible input Keep the table; at least as a Note
eligible input	E	Eligible input The table is helpful to get an overview.	Eligible input Keep the table; at least as a Note
eligible input	E	Eligible input The table is helpful to get an overview.	Eligible input Keep the table; at least as a Note
eligible input	E	Eligible input The table is helpful to get an overview.	Eligible input Keep the table; at least as a Note

eligible input	E	Eligible input The table is helpful to get an overview.	Eligible input Keep the table; at least as a Note
Europe	T	Europe Misleading definition in this context; could be interpreted geographically	Internal European market
Europe	T	Europe Misleading definition in this context; could be interpreted geographically	Internal European market
Europe	t	Europe Misleading definition in this context; could be interpreted geographically	Internal European market
Europe	T	Europe Misleading definition in this context; could be interpreted geographically	Internal European market
Europe	T	Europe Misleading definition in this context; could be interpreted geographically	Internal European market
Europe	T	Europe Misleading definition in this context; could be interpreted geographically	Internal European market
Europe	T	Europe Misleading definition in this context; could be interpreted geographically	Internal European market
Finished Product	T	The clarification with this term is important within the FSC system to determine what type of organization is required to use the transfer system (7.1.2b). It is may still be unclear whether products like lumber or plywood are considered finished or unfinished, because it's based on the "intended use", which is up to the customer and not the supplier. So in some cases it may be finished and in some cases it might not be, and it would be impossible for a certificate holder to know what the intentions are of their customers who purchase the products.	PSU needs to provide clarity and perhaps examples of finished versus unfinished products where there are gray areas so that companies understand their responsibilities under the transfer system.
Finished product	G	The clarification with this term is important within the FSC system to determine what type of organization is required to use the transfer system (7.1.2b). It is may still be unclear whether products like lumber or plywood are considered finished or unfinished, because its based on the "intended use", which is up to the customer and not the supplier. So in some cases it may be finished and in some cases it might not be, and it would be impossible for a certificate holder to know what the intentions are of their customers who purchase the products. However, it's unclear whether there is a better way to define finished product without going into much greater detail and complexity in the standard.	Review with working group to determine if there are options for a more clear definition without going to much greater detail.
Finished product	G	Is recommended to exemplify cases of cutting consumer-ready products without repackaging, changing of the product composition, or relabeling  The most common is any kind of product transformation has either repackaging, changing of the product composition, or relabeling	Include examples of finished products on the CoC. It can be in NOTE.
Finished product	T	Labelling does not change the characteristic of a finished product. Labelling occurs at print shops and retail locations or distribution centers that trade in only finished products.	Remove labelling wording from finished product to avoid confusion from printers and manufacturers.
Finished product	G	Finished product definition is unclear.	It's unclear if I add an FSC label (by mixing product together) if that is considered a "finished" product or not. Also, unclear – if product comes

			from a sawmill at 16' length and is cut to length for the retailer (two 8' lengths) – is that considered finished? Please clarify.
Finished product	G	The definition of finished products is extensive, however it does not give examples.	Include examples of finished products within the definition. It can be included within a NOTE.
Finished product	E	Definition of finished product should include the filling of packaging as a non transformation example	Product that receives no further transformation in terms of processing, labelling, or packaging prior to its intended end use or sale to the end-consumer. Cutting consumer-ready products into size (i.e. by retailers), filling of packaging and products installation are not considered product transformation, unless these activities involve repackaging, changing of the product composition, or relabeling
Finished product	T	Is the cutting also by “wholesalers” versus “retailers” also considered to be not a product transformation. Problem is only that wholesalers do not sell to end-consumers. There may be confusion if it’s left this way.	If not transformation by wholesalers alike, “wholesalers” may need to be added under “e.g.” in order to address potential questions by wholesalers otherwise.
Finished product	G	Definition of finished product seen as problematic. A 2 x 4 is a finished product to one person and to another it is a component of a product assembly with regard to abuse in FSC MIX credit system. The definition will have to be specific to assure entire system regards in same way within handling systems.	Consider linking finished product with transfer system commerce only at distribution. Link Finished product definition to a revised interpretation of who can use MIX Credit. In theory, once a product is “finished” it should only be traded using the transfer system.
FSC 100%: AND Virgin material	G	Following phrase seems inconsistent with the terms used in P&C and IGI as plantation falls into a category of forest: FSC certified forests or plantations	I suggest changing phrase into either of following: FSC certified natural forests or plantations Or FSC certified forests
FSC certified product	E	FSC Certified product: ...	Start the description of FSC Certified product with... “A product made of.....”
FSC certified product	E	FSC Certified product: ...	Start the description of FSC Certified product with... “A product made of.....”
FSC certified product	G	The term “Material” is in this standard used for things used as input. Therefore, the term “Material” should not be used to describe products. I suggest replacing the phrase “FSC certified material” with “Product”	Product that conforms to all applicable certification requirements and is eligible to carry an FSC label and to be promoted with the FSC trademarks.
FSC Certified Product	T	Products can be traded as FSC certified with percentages lower than those required for labeling (70%). For example, a firm we are familiar with never labels their product as FSC and sells it with a claim of 25%.	Suggest definitions insert the term Labeled FSC Certified Product and have a definition for an unlabelled FSC Certified product both of which can be used in FSC assemblies downstream.

FSC Claim	T	The definition table includes a reference under FSC MIX – Percentage System to “FSC Mix X” in the FSC Claim column. The reference should be FSC Mix XX% to capture the majority of use (which will be 70% + for mixed products bearing a label as required by TMK 50.	Add an X to the definition in the table as indicated in the comment at left.
FSC controlled wood	T	FSC controlled wood The current definition is much more clear.	Material originating in non FSC-certified forests or plantations supplied with an FSC claim by a supplier which has been assessed by an FSC-accredited certification body for conformity with FSC Chain of Custody and/or FSC Controlled Wood requirements (FSC-STD-40-005 or FSC-STD-30-010)
FSC controlled wood	T	FSC controlled wood The current definition is much more clear.	Material originating in non FSC-certified forests or plantations supplied with an FSC claim by a supplier which has been assessed by an FSC-accredited certification body for conformity with FSC Chain of Custody and/or FSC Controlled Wood requirements (FSC-STD-40-005 or FSC-STD-30-010)
FSC controlled wood	T	FSC controlled wood The current definition is much more clear.	Material originating in non FSC-certified forests or plantations supplied with an FSC claim by a supplier which has been assessed by an FSC-accredited certification body for conformity with FSC Chain of Custody and/or FSC Controlled Wood requirements (FSC-STD-40-005 or FSC-STD-30-010)
FSC Controlled Wood	T	FSC controlled wood The current definition is much more clear.	Material originating in non FSC-certified forests or plantations supplied with an FSC claim by a supplier which has been assessed by an FSC-accredited certification body for conformity with FSC Chain of Custody and/or FSC Controlled Wood requirements (FSC-STD-40-005 or FSC-STD-30-010)
FSC Controlled Wood		"FSC Controlled wood material and products can not carry any FSC license codes or the FSC trademarks" : Annex 4, 1.2+1.3 of FSC-STD-40 005 seem less restrictive as there are options for using the FSC Controlled Wood Code plus “controlled wood” as segregation mark. Does the new definition in 40 004 V3 mean that this option does not exist anymore?	
FSC Controlled Wood	T	FSC controlled wood The current definition is much more clear.	Material originating in non FSC-certified forests or plantations supplied with an FSC claim by a supplier which has been assessed by an FSC-accredited certification body for conformity with FSC Chain of Custody and/or FSC Controlled Wood requirements (FSC-STD-40-005 or FSC-STD-30-010)
FSC Controlled Wood	T	This definition has requirements embedded within it. If these requirements are meant to be a component of the new 40-004 standard they should be listed as standard requirements as opposed	Remove last sentence from definition and add to an auditable section of the new standard if it is meant to be

		to a definition placement.	present. If it is not meant to be present the normative requirement should be placed in the appropriate standard to avoid confusion.
FSC Controlled Wood	T	FSC controlled wood The current definition is much more clear	Material originating in non FSC-certified forests or plantations supplied with an FSC claim by a supplier which has been assessed by an FSC-accredited certification body for conformity with FSC Chain of Custody and/or FSC Controlled Wood requirements (FSC-STD-40-005 or FSC-STD-30-010)
FSC Controlled Wood		I should not say that CW is not included in the FSC certification is unclear.	.....Materials or products sold as FSC Controlled Wood cannot carry any on-product FSC labels, FSC license codes, or the FSC trademarks and are not considered to be FSC certified, <b>just if this material is mixed con FSC 100%</b>
FSC Controlled Wood	T	FSC controlled wood The current definition is much more clear.	Material originating in non FSC-certified forests or plantations supplied with an FSC claim by a supplier which has been assessed by an FSC-accredited certification body for conformity with FSC Chain of Custody and/or FSC Controlled Wood requirements (FSC-STD-40-005 or FSC-STD-30-010)
FSC Controlled Wood	T	The last sentence specifies claim restrictions for CW, which has nothing to do with a definition. Normative requirements should not be in the Definitions, but in the Standard, which they are.	Delete the last statement.
FSC credit	T	FSC credit Amount of product (volume or weight) Some products (e.g. decorative paper, HPL) are trade in square meter.	Amount of product (e.g. volume or weight or other units)
FSC credit	T	Some products (e.g. decorative paper, HPL) are trade in square meter.	Amount of product (e.g. volume or weight or other units)
FSC credit	T	Some products (e.g. decorative paper, HPL) are traded in square meter.	Amount of product (e.g. volume or weight or other units)
FSC input	G	FSC input should be kept for clarification	FSC input Input of FSC-certified virgin material that counts towards the input percentage or towards the FSC credit for a product group as follows: a) material with an FSC 100% claim: counts as the full quantity stated on the supplier invoice; b) material with an FSC Mix x% claim: counts as the percentage of its quantity that is stated on the supplier invoice; c) material with an FSC Mix credit claim: counts as the full quantity stated on the supplier invoice

FSC input	G	FSC input should be kept for clarification	FSC input Input of FSC-certified virgin material that counts towards the input percentage or towards the FSC credit for a product group as follows: a) material with an FSC 100% claim: counts as the full quantity stated on the supplier invoice; b) material with an FSC Mix x% claim: counts as the percentage of its quantity that is stated on the supplier invoice; c) material with an FSC Mix credit claim: counts as the full quantity stated on the supplier invoice
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FSC Mix	T	The definition of the term "FSC Mix" needs further clarification whether it includes FSC Mix x% and FSC Mix Credit?	FSC Mix x% und FSC Mix Credit
FSC percentage	E	This concept seems to be the same as 'Percentage claim, but the definition is slightly different. The two definitions should be aligned, if possible.	Refer to the definition of 'Percentage claim'.
FSC Recycled	E	The definition of FSC Recycled should be consistent with FSC Mix definition	FSC claim for products or material based on inputs of one and more of the following material categories: FSC recycled, post-consumer reclaimed and/or pre-consumer reclaimed.
FSC Recycled		FSC recycled: „input exclusively from reclaimed sources“ is still very restrictive. For practical reasons, a minimal portion of fresh fibre (FSC certified or FSC controlled wood of course) could be allowed as it is often not possible to entirely exclude the possibility that really small amounts of fresh fiber "pollute" the reclaimed input material (also 3.2.2 TableB)	
FSC Recycled		include pre and post-consumer phrases	

FSC Recycled	E	To be consistent with other terms and definition following change should be made. Original: FSC claim for products based on inputs exclusively from reclaimed sources.	Proposed change: FSC claim for products or materials based on inputs exclusively from reclaimed sources.
Input		This definition references a term FSC Product Group which should itself be defined in the glossary.	Add definition for FSC Product Group to the Glossary.
material category	T	Material category Keep e) controlled material	Material category Categories of virgin or reclaimed material that, if eligible input, can be used in FSC product groups. The material categories are the following: a) FSC 100%; b) FSC Mix; c) FSC Recycled; d) FSC Controlled Wood; e) controlled material g) Post-consumer reclaimed; h) Pre-consumer reclaimed;
material category		Again this definition refers to the concept of Controlled Material, what is controlled material?	Define Controlled Material, see remarks above. (Consider adding a definition that helps us manage the concept of quarantine of material thought to be controlled but lacking the necessary paperwork to be cleared. Controlled Material is quarantined until it has the necessary credentials to tie it out satisfactorily to a risk assessment. Or, consider adding a definition of uncontrolled wood to the definition and approach it from that direction.)
material category	T	Material category Keep e) controlled material	Material category Categories of virgin or reclaimed material that, if eligible input, can be used in FSC product groups. The material categories are the following: a) FSC 100%; b) FSC Mix; c) FSC Recycled; d) FSC Controlled Wood; e) controlled material g) Post-consumer reclaimed; h) Pre-consumer reclaimed;
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material category	T	The term controlled material was removed from this section as well as in the definition of material category. Controlled material or controlled wood should be kept as a material category. The term Controlled wood or controlled material distinguishes the material category from the claim FSC Controlled Wood. In the proposed version 3.0 of FSC-STD-40-005, controlled wood is defined.	Keep Controlled material or Controlled Wood as a material category.

material category	T	Material category Keep e) controlled material	Material category Categories of virgin or reclaimed material that, if eligible input, can be used in FSC product groups. The material categories are the following: a) FSC 100%; b) FSC Mix; c) FSC Recycled; d) FSC Controlled Wood; e) controlled material g) Post-consumer reclaimed; h) Pre-consumer reclaimed;
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Neutral material	G	We support the definition of neutral material and the clarity of what is considered a neutral material. We also support specifically including language in the definition that neutral materials used in FSC product groups are exempt from chain of custody control requirements.	
Neutral material	E	Clear definition but I never saw this term referenced in the document itself. Is it really needed?	Remove the term "neutral material" if not referenced elsewhere.
Neutral material	G	New concept, apparently borrowed from PEFC – why? Don't see the need.	Drop it.
Non Forest Based Material		Use of bamboo in a plywood panel assembly requested over or in addition to the flax example. Is bamboo a non-timber forest product (grass?) Is it OK to sell a FSC MIX assembly and still go ahead and make a deduction for the volume of NTFP against a credit account in Mix Handling? This is a big issue for the hardwood plywood industry...whether FSC certified bamboo veneers are required as a qualified input to a Mix Credit system which just requires credentialed inputs but makes no reference to NTFPs and their applicability in FSC MIX solid wood assemblies.	Do some more outreach and focus on examples of NFBM that are more frequently encountered and familiar. Bamboo is always a big question mark and should be specifically addressed in solid wood assemblies.
non-conforming product	G	Thank you for adding a very clear definition of what constitutes a non-conforming product.	None

non-conforming products	T	This definition now also defines that all products that are not FSC-certified purchased by the organisation are non-conforming products. In that case all requirements in clause 1.7 apply to these products, which cannot be the intention for these requirements. A product is non-conforming when it is (unintentionally) wrongly used in the chain of custody system as eligible input material.	Add: in the chain of custody Product or material <b>in the chain of custody</b> for which an organization is unable to demonstrate that it complies with FSC eligibility requirements for making claims and/or for using the FSC on-product labels.
Non-timber forest product	E	We are very concerned about how chain of custody control requirements will be applied to bamboo fibers used in FSC product groups. As currently defined a Neutral material does not include non-timber forest products and are exempt from chain of custody control requirements. The inference being that a Non-timber forest product is not exempt from chain of custody control requirements. This could lead to perverse outcomes that whereas bamboo sold with an FSC claim is an eligible input, bamboo sold without an FSC claim would be non eligible to enter a specific FSC product group. In addition, bamboo grown outside of a forest matrix would be considered a neutral material and be exempt from chain of custody control requirements.	Bamboo supplied without an FSC claim by an FSC certified organization or that comes from outside a forest matrix is defined as a neutral material.
output	T	Output New definition should be clarified	Output Raw materials, semi-finished or finished products that are produced and/or supplied by an organization with an FSC claim
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Outsourcing	G	Many companies outsource because they don't have the resources/facilities in house, not just a staffing issue	Suggest add, staffing or resourcing it internally
Outsourcing	T	This definition seems to propose that outsourcing may only take place in a third party situation, and would not allow outsourcing between sites owned by the same company. Meaning, this proposed change would require a multisite manufacturing location, which maybe only provides one function out of many related to FSC, to be added to the certificate. This would drive up audit costs with little added benefit.	PSU needs to consider the ramifications of this definition only applying to "third-parties" and clarify the intent of this change.
Outsourcing	G	This definition seems to propose that outsourcing may only take place in a third party situation, which would mean that outsourcing would not be allowed between sites owned by the same company, and instead the sites would have to be added as a participating site on the certificate. For example, this proposed change would mean that a multisite manufacturing location could not outsource to another distribution location within the same company, and this other site would have to be added to the certificate. However, this other participating site that has been outsourced to may not do any other business related to FSC. It's unclear then why we would want to require this other site to be included in the certificate and not just allow outsourcing to occur within an organization. This will likely be a change for some certificate holders who may currently hold outsourcing agreements with other sites within the organization. However, it appears as though there are varying perspectives on this issue of whether outsourcing should be allowed within the organization or whether outsourcing should only be allowed for third parties. In either case, the definition here must align with the definitions above for "contracting organization" and "contractor".	Review application of outsourcing and align with contractor and contracting organization definitions.
Outsourcing	T	This definition implies that any contract of an internal business process will be defined as outsourcing.	This implies that all logging contractors may need to be considered outsourcers and have outsourcing contracts re: FSC material before beginning work. Is this what was intended? Should change definition or requirements on outsourcing to fix.
Participating Site	G	The term "subcontractor" is used here as if it is the same as "contractor". If they are the same, then "contractor" should be used. If they are different, then "subcontractor" needs to be defined.	
Percentage Claim	T	Change wording of definition to "subsequent calculations of input percentages or FSC MIX credit?"	Not sure exactly what this definition does over the definition of FSC handling systems. Consider other definitions that start with "FSC" and consider dropping "FSC" to make definitions easier to find and relate to one another.
Percentage System	T	Scenario A includes an input of a Mix % log. This is not common and should not be used in the example. Also, the logs are characterized as units. This is not something that FSC wants to promote within an example. A conversion factor of logs to lumber should not be assumed as 1.	FSC should revise the diagram/example to be realistic of a product that is commonly produced with real time calculations and conversion factors.
Pre-consumer reclaimed material	E	Whether a company can re-use a reclaimed material in the same manufacturing process that generated it should be irrelevant if the company chooses to sell the material to a third-party as a pre-consumer reclaimed material. The issue is to keep this material from going to a waste disposal facility if the producing facility cannot or chooses not to use it.	Delete "and not capable of being re-used on-site in the same manufacturing process that generated it."

Pre-consumer reclaimed paper	T	<p>The restriction of pre-consumer Claim-contributing input to paper scraps only is hard to understand: is there a real technical argument to consider paper but not wood or other forest products?</p> <p>I get it that this results from PEFC's current consideration of ALL pre-consumer inputs as claim-contributing inputs, and also that it stemmed from a motion focusing only on paper. But why did the FSC "study" not consider all pre-consumer inputs in the first place? Surely FSC has a way of considering motion requests that compensate for stakeholders who were not there to speak up – for they have no money to go to an assembly, or are unfamiliar with the FSC decision making process, for instance.</p> <p>I am personally uncomfortable with this type of FSC decision-making, which appears to favour powerful, well organized sectors. I would prefer decision making that is methodical, logical, and considers all sectors, even those that are too small or naive to lobby FSC to do what they want... such as the cork sector, where total re-use of pre-consumer inputs is routine – it is a zero waste sector. I feel this restriction will not go down well outside the pulp&amp;paper world, and will further erode FSC's brand value.</p>	<p>"Study" the impact of doing the same for the other sectors, in the name of fairness and rational decision-making. The results aren't that different.</p>
primary manufacturing	E	The definition of primary manufacturing shall not be treated as only a virgin mill	For chip and fibre products, primary manufacturing includes the pulp and paper production from virgin and reclaimed raw materials
primary manufacturing	T	Materials are not always harvested in straight roundwood form. Chipping can happen in woods by a subcontractor. The definition does not encompass this typical process.	Add to definition - Any processing that transforms roundwood into other products. For chip and fibre products, primary manufacturing includes the pulp and paper production from virgin raw roundwood or chip materials.
primary manufacturing	T	The definition is a bit convoluted and can be misinterpreted. Simplification is suggested.	Suggested wording: "Any processing that transforms virgin wood fiber into other products."
Product group	E	Keep the previous definition as it is clearer and more auditable.	
Product group	E	Keep the previous definition as it is clearer and more auditable.	
Product group	G	Drop down the term "product group". Lots of people have problems to understand it in practise. The companies have to do great efforts to adapt their ERPs, especially when they have to differ between wood species.	Replace it by the existing "product type" and additional requirements for the input (e.g. only FSC-certified and/or controlled material can be included in a product type). No more differentiation between wood species.
Product group	T	Product Group can only have one system of control	<p>Include in PG definition : (add red text)</p> <p>"Product group: A product or group of products specified by the organization, <b>with a defined system for controlling FSC Claims</b>, which can be combined for the purpose of FSC chain of custody control and labelling.</p>
Product group and 2.2.1	T	Certain products "CAN BE combined for the purpose of" COC ... but do not have to?! In many cases it makes no sense to build product groups (e. g. print houses applying the COC system for single jobs/orders).	<p>Clarify that products do not HAVE TO be combined in product groups, but that the FSC control system can also be applied on the basis of single jobs/orders or articles.</p> <p>2.2.1 should clarify that either the COC is implemented for product groups or for single products,</p>

			jobs/orders.
quality	G	<p>Definitions: Quality Definition Vagueness</p> <p>This is as good a place as any to point out how difficult it is for CBs to determine a fair, consistent, transparent way to determine quality. I believe the concept of quality of inputs be scrapped in favor of species in and species out. More energy needs to be put into basic metric log conversion studies against scales in use. In the United States, these scales include Scribner, Doyle, among others. Need conversion studies (to cubic meters) from these various scales.</p> <p>If FSC is to ever realize gains in decorative hardwood veneer, accommodations have to be made to the veneer producers to allow cubic M3 in subject to conversion loss and then M3 out in ANY GRADE of material demanded by the marketplace to effectively match supply with demand by creating a more efficient mechanism to pull demand for FSC forests through to the market. Paper is mixed, many of the comments which follow address the concerns related arbitrary evaluation of market value of downstream production. It is all haphazard and negotiated one offs that do not contribute to the integrity of the standard but instead crimp the ability of primary suppliers to flow FSC product to meet specific, appearance demands.</p>	<p>This is more of a strategic point, but somewhere the point should be made.</p> <p>The more FSC meddles in how mixtures of wood are put together the greater friction presented to standing FSC trees and the markets that could potentially make use of them.</p> <p>The association standard, audit rigor, additional rules on transaction tracing, etc... are all additional layers of assurance FSC needs to communicate to markets to hasten uptake of FSC materials.</p>
quality	G	This definition does not allow a clear and objective interpretation.	Definition clarification.
quality	T	<p>Quality</p> <p>The definition of "quality" is very complicated. Please simplify</p>	<p>Quality degree to which a set of inherent characteristics fulfils requirements [source ISO 9000:2005]</p>
quality	G	This definition does not allow a clear and objective interpretation.	Definition clarification.
quality	E	<p>Drop the concept of Quality, since it is confusing and out of the scope of a CoC standard. How this will interact with the previous concept of Product group?</p> <p>Keep only the concept of Product Group. If well implemented would solve of the problems detected so far.</p>	
quality	E	<p>Drop the concept of Quality, since it is confusing and out of the scope of a CoC standard. How this will interact with the previous concept of Product group?</p> <p>Keep only the concept of Product Group. If well implemented would solve of the problems detected so far.</p>	
quality	T	The definition of "quality" was not clearly and uniformly understood by the Standard Development Group and Stakeholders. The credit system is seen as "virtual system", while pp 9.3.2, 9.3.3, 9.4.4 and 9.3.5 refer to something tangible (as quality).	Provide clearer definition of "quality" and give concrete examples of what it is/ is understood in the context of the standard.
quality	G	<p>There are some concerns that this definition still seems too subjective and leaves room for interpretation by auditors, which does not create consistency for certificate holders or certification bodies.</p> <p>Additionally, there is some concern around whether credit accounts for virgin material should be maintained separately from the inputs of recycled fiber. The current definition here and the credit system analysis does not appear to distinguish these inputs as needing separate credit account, and therefore it may be possible to build credit accounts from solely recycled inputs without sourcing from FSC certified forests.</p>	Discuss the application of the definition with the COC working group.
quality	T	The definition of "quality" is very complicated. Please simplify	<p>Quality degree to which a set of inherent characteristics fulfils requirements [source ISO 9000:2005]</p>

quality	G	The definition of quality may raise more doubts and problems than actually solutions for any existing issue. It should be considered to remove this definition and the use of this term, which has a different meaning within a company context.	Remove definition of 'Quality'.
quality	T	The definition of "quality" is very complicated. Please simplify	Quality degree to which a set of inherent characteristics fulfils requirements [source ISO 9000:2005]
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quality	G	This definition does not allow a clear and objective interpretation.	Definition clarification.
Quality	T	The definition of "quality" is very complicated. Please simplify	Quality degree to which a set of inherent characteristics fulfils requirements [source ISO 9000:2005]
Quality management system	T	The definition of "Quality Management System" is not covering all relevant aspects	Quality Management System management system to direct and control an organization with regard to quality [source ISO 9000]
Quality management system	T	The definition of "Quality Management System" is not covering all relevant aspects	Quality Management System management system to direct and control an organization with regard to quality [source ISO 9000]
Quality management system	G	Why "Quality?" It could also be an Environmental Management System.	Omit "Quality" and refer to it simply as "Management System."
Quality management system	T	The definition of "Quality Management System" is not covering all relevant aspects	Quality Management System management system to direct and control an organization with regard to quality [source ISO 9000]
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quality management systems	T	The definition of "Quality Management System" is not covering all relevant aspects	Quality Management System management system to direct and control an organization with regard to quality [source ISO 9000]
Sales document	T	It does not matter if a payment is fulfilled, sending an invoice (or electronic record) is enough to take over (legal) ownership of the product. Sometimes even the payment does not (fully) take place.	Delete: and becomes a document of title when paid in full Physical or electronic commercial instrument that attests to the sale of a product (i.e. invoice, bill of sale, contract of sale, credit notes). It identifies both the trading parties and lists, describes, and quantifies the items sold, shows the date of sale, prices and delivery, and payment terms. It serves as a demand for payment <b>and becomes a document of title when paid in full.</b>
Sales document	G	It should be made clear that if an organization issues sales contract as well as invoice, it is either of them (not both of them) which need to comply with the requirements in section 6. It is often a case that both sales contract and sales invoices are issued.	I suggest adding a following sentence: When an organisation issues several sales documents for a single trade, one of these documents shall meet the requirements of this standard.
Sales document	G	Regarding Sales document: Compared to the old standard, the new standard is more limited in terms of which documents it allows. It is not clear if i.e. monthly credit notes summarizing several transactions would be acceptable with the new standard. Therefore the addition of "other documents" is proposed.	Suggest for change: Sales document: Physical or electronic commercial instrument that attests to the sale of a product (i.e. invoice, bill of sale, contract of sale, credit note or others)
sales function	E	The term "sales function" is used in the definition of a site. But what constitutes a sales function? It could be appropriate to define this in some way or give an example.	Elaborate the expression "sales functions" by giving examples or criteria for what constitutes a sales function

Salvaged wood		<p>Salvaged wood: new definition „naturally felled (storm or snow)“ poses a lot of questions . (1) from the perspective of FSC certified forest operations: How are they going to deal with his new definition? Do they have to sell wood felled by natural events with a separate claim? With separate storing places and separate transport? Do they have to execute a 30 001 verification? How would it be possible to separate wood in a single logging area if there are a few trees killed by barkbeetle and consequently felled (or falling down), and trees which are cut under a planned harvesting operation? In the case of large windthrow events, it would consequently mean that FSC certified forest operations cannot sell any FSC certified wood for one or more years, if the equivalent of volume of one annual cutting plan (or more) has been thrown. (2) For round wood traders or primary processors: Are they obliged to carry out 40 005 verifications if buying windthrow wood from FSC certified forest operations? And to separate “normal” cut (FSC certified) from naturally felled (FSC Controlled Wood) even if both portions of wood are coming from the same FSC certified forest operation?</p> <p>Also salvaged wood: definition „felled for purposes other than wood production“ does not take into account that FSC certified forest operations in central Europe rarely cut only for the purpose of wood production. Sometimes, wood is cut as a natural protection measure (to remove tree species not native to the site for example); or because they pose a danger to traffic or for recreational sites; or because because trees with diseases are removed before disease spreads to neighbor trees; or for logging tracks; other reasons are possible as well. All of this can occur in an FSC certified forest operation under proper forest management planning; would such timber have to be physically separated from timber from “pure” wood production harvesting operations? And consequently sold with FSC Controlled Wood claim instead of FSC 100% claim? Definition “for road clearance”: is a logging road (with solid surface but not tarmac) also included? Is a simple logging track (without permanent surface, but regularly used by logging machines) to be considered as “road”?</p>	
Salvaged wood	T	<p>2 types of salvaged wood proposed should be reconsidered:</p> <p>“Felled and subsequently lost” - The place of origin/harvest for these materials will be difficult and at times impossible to discern. This brings a high level of risk to the FSC system to allow such materials of input into the FSC system, when their true origin is unknown.</p> <p>“Submerged by water” – Almost 100% of the materials in this category have been submerged due to conversion. In a time where conversion timber is of high priority to eradicate from the FSC system, the addition of this type of material to the controlled wood system should be reconsidered.</p>	Suggest adding a consultation note under the definition (like was done for claim contributing input) to bring attention to the addition of this definition to the standard. The consultation note should explain the risks of adding both “felled materials” and “submerged materials” to the FSC system.
Salvaged wood	G	Do we need the description about salvaged wood in this standard?	Maybe remove it from the CoC standard and of course keep it in other standards as CW and FM
Salvaged wood	G	Do we need the description about salvaged wood in this standard?	Maybe remove it from the CoC standard and of course keep it in other standards as CW and FM
Salvaged wood	G	This term only appears in Terms and definitions. Terms and definition should be used to explain terms which are used elsewhere in the standard.	I suggest moving this section to B Scope.

Salvaged wood	T	Definition of “Salvaged Wood” now states: : “For the purposes of FSC chain of custody control and labelling, salvaged wood is considered as virgin material and shall be assessed as FSC Controlled Wood for use in FSC products.” Do you mean any salvaged wood is automatically considered FSC Controlled?	Clarify whether salvaged wood is automatically considered controlled or whether a 40-005 must be followed ie must be subject to a CWRA
Scope	G	Here is an opportunity to identify the scope as a table created by the CB and placed on info.fsc.org to facilitate trade.	Reference the terms “table” and consider referencing “info.fsc.org” as the place where this scope is maintained. Consider enhancing info.fsc.org to allow CHs to build their scope and product group schedules by lining up their vendors which then cascade down to a winnowed (by CH) result. The scope and PGS would never exceed the scope, categories from upstream but would be winnowed down to what is practical and relevant for sale.
Scope	T	Comments by Jason Grant – I agree	Suggestions by Jason Grant – I agree
Scope	G	Certificate Holders supplying FSC certified materials to USGBC LEED rated projects currently have the option to implement procedures for making claims using the “LEED alternative pathway.” This has been supported by National Initiatives (link). This option is not addressed within this draft standard.	FSC should incorporate “LEED Alternative Pathways” into the second draft of the standard so it can be a part of the consultation process.
Scope	T	“Operations covered by this standard include the primary industry sector (harvesting, pre-processing), reclamation sites in the case of recycled materials, the secondary sector (primary and secondary manufacturing), and the tertiary sector (trading, wholesale, retail, print services)”  Reclamation sites meaning the locations that the post- or pre-consumer materials have been collected from (not the site that collects them) are evaluated under separate standard FSC-STD-40-007. Reclamation sites are not operations and do not commonly hold FSC certification, it is more common for the manufacturing operation that collects the reclaimed materials (primary or secondary) to hold FSC certification and implement the CoC and reclaimed standard for such supply.	Suggested revision: “Operations covered by this standard include the primary industry sector (harvesting, pre-processing), the secondary sector (primary and secondary manufacturing), and the tertiary sector (trading, wholesale, retail, print services)”
Scope	E	For consistency with other similar references in the standard text, it should be added a reference also to reclamation sites as potential origin of wood. (3rd paragraph, 3rd line)	“...change in legal ownership of the product from the certified forest or reclamation site up to the point where...”
Site	T	There are sites, which have different legal entities for historical reasons in several countries. The number of legal entities on a site is not considered relevant and has never caused difficulties. The issue has not been discussed in the working group.	Delete “A site can never include more than one legal entity.” from the definition of site.
Site	T	Site Needs to be clarified by an extension	site A single functional unit of an organization or a combination of units situated at one locality, situated at one physical location, which is geographically distinct from other units of the same organization. An organization’s units with distinct physical locations may, however, be regarded as parts of a site if they are an extension of it with no purchasing, processing, or sales functions of their own (e.g. a remote stockholding). A site can never include more than one legal entity. Contractors that are

			<p>used within the terms of outsourcing agreements (e.g. outsourced warehouse) are not considered sites.</p> <p>NOTE: Typical examples for sites are processing or trading facilities such as manufacturing sites, sales offices, or warehouses owned by the organization.</p>
Site	T	There are sites, which have different legal entities for historical reasons in several countries. The number of legal entities on a site is not considered relevant and has never caused difficulties. The issue has not been discussed in the working group.	Delete "A site can never include more than one legal entity." from the definition of site.
Site	T	It is quite common for large facilities to have multiple legal entities working on one site.	Delete "A site can never include more than one legal entity."
Site	T	There are sites, which have different legal entities for historical reasons in several countries. The number of legal entities on a site is not considered relevant and has never caused difficulties. The issue has not been discussed in the working group.	Delete "A site can never include more than one legal entity." from the definition of site.
Site	E, T	A part of the text: "A site can never include more than one legal entity"	This restriction related to the number of legal entities should be deleted. Instead the text of the existing CoC-standard, i.e. "A single functional unit of an organization or a combination of units situated at one locality" should be retained...
Site	E	The statement that "a site can never include more than one legal entity" is confusing. Better clarity is needed as to how a site and a physical location differ. I know of cases where a pulp mill and a paper mill occupy the same physical location but are owned by two different legal entities.	Delete "a site can never include more than one legal entity."
Site	E	A part of the text: "A site can never include more than one legal entity"	This restriction related to the number of legal entities should be deleted. Instead the text of the existing CoC-standard, i.e. "A single functional unit of an organization or a combination of units situated at one locality" should be retained...
Site	E	A part of the text: "A site can never include more than one legal entity"	This restriction related to the number of legal entities should be deleted. Instead the text of the existing CoC-standard, i.e. "A single functional unit of an organization or a combination of units situated at one locality" should be retained...
Site	E	A part of the text: "A site can never include more than one legal entity"	This restriction related to the number of legal entities should be deleted. Instead the text of the existing CoC-standard, i.e. "A single functional unit of an organization or a combination of units situated at one locality" should be retained...

Site	T	Site Needs to be clarified by an extension	site A single functional unit of an organization or a combination of units situated at one locality, situated at one physical location, which is geographically distinct from other units of the same organization. An organization's units with distinct physical locations may, however, be regarded as parts of a site if they are an extension of it with no purchasing, processing, or sales functions of their own (e.g. a remote stockholding). A site can never include more than one legal entity. Contractors that are used within the terms of outsourcing agreements (e.g. outsourced warehouse) are not considered sites. NOTE: Typical examples for sites are processing or trading facilities such as manufacturing sites, sales offices, or warehouses owned by the organization
Site	E	A part of the text: "A site can never include more than one legal entity" There are sites, which have different legal entities for historical reasons in several countries. The number of legal entities on a site is not considered relevant and has never caused difficulties. The issue has not been discussed in the working group.	This restriction related to the number of legal entities should be deleted. Instead the text of the existing CoC-standard, i.e. "A single functional unit of an organization or a combination of units situated at one locality" should be retained...
Site	T	Site Needs to be clarified by an extension	site A single functional unit of an organization or a combination of units situated at one locality, situated at one physical location, which is geographically distinct from other units of the same organization. An organization's units with distinct physical locations may, however, be regarded as parts of a site if they are an extension of it with no purchasing, processing, or sales functions of their own (e.g. a remote stockholding). A site can never include more than one legal entity. Contractors that are used within the terms of outsourcing agreements (e.g. outsourced warehouse) are not considered sites. NOTE: Typical examples for sites are processing or trading facilities such as manufacturing sites, sales offices, or warehouses owned by the organization.
Site	T	It says: A single functional unit. But a site often has more than one function. Especially when a company is composed of only one site, all functions are in that one site including sales, accounting, processing, storing etc. There are many companies which only has one site.	I suggest removing the phrase "A single functional".

Site	E	There can be sites, which have different legal entities for historical reasons. The number of legal entities on a site is not considered relevant and has never caused difficulties. The issue has not been discussed in the working group.	Delete "A site can never include more than one legal entity." from the definition of site. Instead the text of the existing CoC-standard, i.e. "A single functional unit of an organization or a combination of units situated at one locality" should be retained...
Site	E	There can be sites, which have different legal entities for historical reasons. The number of legal entities on a site is not considered relevant and has never caused difficulties. The issue has not been discussed in the working group.	Delete "A site can never include more than one legal entity." from the definition of site. Instead the text of the existing CoC-standard, i.e. "A single functional unit of an organization or a combination of units situated at one locality" should be retained...
Site	E	There can be sites, which have different legal entities for historical reasons. The number of legal entities on a site is not considered relevant and has never caused difficulties. The issue has not been discussed in the working group.	Delete "A site can never include more than one legal entity." from the definition of site. Instead the text of the existing CoC-standard, i.e. "A single functional unit of an organization or a combination of units situated at one locality" should be retained...
Site	T	Site: The definition of site is too narrowly restrictive.	The part of definition of site: "site can never include more than one legal entity" should be deleted
Site	T	It states "...if they are an extension of it with no purchasing, processing, or sales ..."	The word "processing" may need to be defined as some consider it in regards to manufacturing and others also to moving material.
Site	T	'A site can never include more than one legal entity'. Why? A real example would be where an FSC certificate is for company X Ltd making products and company X Trading, who buy and sell FSC products from a sister company, two legal entities based in the same location. Do they then need a multisite certificate for the one physical location? This would be too onerous. It would appear that the solution/definition is trying to fix a problem but in doing so complicates things unnecessarily. Many companies will have more than one legal entity at any given site, we do not understand the requirement.	Reconsider the definition to allow more than one legal entity at one site.
Site	T	Site Needs to be clarified by an extension	site A single functional unit of an organization or a combination of units situated at one locality, situated at one physical location, which is geographically distinct from other units of the same organization. An organization's units with distinct physical locations may, however, be regarded as parts of a site if they are an extension of it with no purchasing, processing, or sales functions of their own (e.g. a remote stockholding). A site can never include more than one legal entity. Contractors that are used within the terms of outsourcing agreements (e.g. outsourced warehouse) are not considered sites. NOTE: Typical examples for sites are processing

			or trading facilities such as manufacturing sites, sales offices, or warehouses owned by the organization.
Site	T	Site Needs to be clarified by an extension	site A single functional unit of an organization or a combination of units situated at one locality, situated at one physical location, which is geographically distinct from other units of the same organization. An organization's units with distinct physical locations may, however, be regarded as parts of a site if they are an extension of it with no purchasing, processing, or sales functions of their own (e.g. a remote stockholding). A site can never include more than one legal entity. Contractors that are used within the terms of outsourcing agreements (e.g. outsourced warehouse) are not considered sites. NOTE: Typical examples for sites are processing or trading facilities such as manufacturing sites, sales offices, or warehouses owned by the organization.
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			warehouses owned by the organization.
Site	T	Typo noted at end of definition.	Revised "Despatch" to "Dispatch."
Site and 7.1.1, 8.1.2 and 9.1.2	T	The application of an FSC control system on the level of a single site is not feasible if the sites are only production sites with no own power of decision. If all sites belong to the same legal entity, have centralised purchase, sales and controlling, ONE material account would be enough. In these cases inter-company material flows are not relevant with regard to the intention of COC certification.	Clarify that for "single certificates with multiple sites" as defined in FSC-STD-40-003 V2-1 chapter 1 the FSC control system can be used by implementing ONE material account for all sites within the scope of the certificate.
site	T	In case the definition of the term „site“ is too restrictive the companies that manages sites that are only production sites („extended work bench“) cannot use the FSC-credit system across production sites. They need to make use of more than one control system to allow for only one legal entity, which controls input and output material from one central point. It is ineffective to manage intercompany material flows in several FSC credit system within one company.	Revision of the definition of the term „site“. Clarification on the matter that companies that have sites which are only production sites ("extended work bench") and central purchase of input and output material, as well as central management of material flows only need ONE FSC-credit account. Therefore, making intercompany material flows not worthy to use extra credit accounts, if the entire company is included in the FSC-credit system ("black box").
site	T	Site Needs to be clarified by an extension	site A single functional unit of an organization or a combination of units situated at one locality, situated at one physical location, which is geographically distinct from other units of the same organization. An organization's units with distinct physical locations may, however, be regarded as parts of a site if they are an extension of it with no purchasing, processing, or sales functions of their own (e.g. a remote stockholding). A site can never include more than one legal entity. Contractors that are used within the terms of outsourcing agreements (e.g. outsourced warehouse) are not considered sites. NOTE: Typical examples for sites are processing or trading facilities such as manufacturing sites, sales offices, or warehouses owned by the organization.
Solid wood Product	T	Unclear if solid wood product can be engineered or not. No reference to engineered constructions including engineered flooring,	Consider expanding definition to include reference to glued solid wood



		all veneer plywood, Glulam beams.	assemblies to alleviate uncertainty.
transfer system	T	This definition clearly states that an organization may downgrade FSC claims in a transfer system if it wishes to.	Need to ensure internal consistency throughout document with this allowance – other areas seem to imply you can't do this.
Uncontrolled Wood		Add Uncontrolled Wood Uncontrolled Wood: Wood that lacks the necessary credentials sufficient to link to a risk assessment or wood that originates from sources or regions where CW requirements cannot be met.	See Controlled Material discussion above. (Consider adding a definition that helps us manage the concept of quarantine of material thought to be controlled but lacking the necessary paperwork to be cleared. Controlled Material is quarantined until it has the necessary credentials to tie it out satisfactorily to a risk assessment. Or, consider adding a definition of uncontrolled wood to the definition and approach it from that direction.)
Virgin	T	This term has caused a great deal more trouble than it is worth. Virgin to Columbia means from roundwood with no recycled or recovered or reclaimed content added.	Revise definition to also exclude recycled, reclaimed material.
Virgin Material	T	FSC Mix and/or FSC Controlled Wood inputs being purchased by downstream certificate holders may contain percentages of either or both pre- or post-consumer reclaim. The current definition suggests that FSC Mix and FSC Controlled Wood are always of virgin materials.	Consider removing the last sentence from the definition, or rewording as more accurately, "Virgin material: Primary (i.e. non-reclaimed) material originating in forests or plantations. The following categories may contain virgin materials: a) FSC 100%; b) FSC Mix; c) FSC Controlled Wood."
Virgin Material	T	The definition for virgin materials includes FSC Mix. RA recognizes that FSC Mix products are often comprised of all virgin material, however it is also very common for FSC Mix paper product to contain reclaimed materials.  The definition of FSC Mix includes the possibility of non-virgin materials to be "mixed" with virgin materials to make an FSC claim. This draft standard also allows companies to downgrade FSC Recycled materials to an FSC Mix claim (reference Table E on page 26)	A note or clarification shall be added to this definition to explain that inputs to FSC Mix are not solely virgin.  Primary (i.e. non-reclaimed) material originating in forests or plantations. Inputs to the following material categories are classified as virgin material: a) FSC 100%; b) FSC Mix (can be a mix of virgin and reclaimed materials); c) FSC Controlled Wood.
Virgin Material	E	Do not like the use of the term "Virgin" / Implies material sourced from old growth natural forests.	Change the word "Virgin" to "Original Use" or another suitable alternative
Virgin Material	G	Definition of "Virgin material" causes misunderstanding as FSC Mix and FSC CW can include materials from reclaimed sources.	Second sentence of the definition is to be removed.
1.1.1	T	Use of the word conformity is an incorrect word to use in this requirement. Conformity – conforming to social norms The word conformance should be used in this normative document. Conformance – conforming to technical specifications	The organization shall appoint a management representative that has overall responsibility and authority for the organization's conformance with all applicable certification requirements.

1.1.1	G	RockTenn believes that the proposed change from: “compliance with all applicable requirements of this standard” to “conformity with all applicable certification requirements” is vague and will introduce a degree of interpretation at the certifying body level that may result in an increased number of unfounded and contested non-conformances.	The recommendation is to keep the current language in this section.
1.1.1	T	The proposed change here appears to change the intent of the requirements. The existing clause is applicable to the Chain of Custody standard only, and the proposed change will make the clause applicable to all certification requirements, not just those related to this standard.	Specify the certification requirements applicable to chain of custody standard.  Or keep “..with all applicable requirements of the chain of custody standard.
1.1.1., 1.2.1., 1.3.1., 1.6.1.	E	This standard can not require something beyond the scope of this particular standard. The definition “all applicable certification requirements” or “certification requirements” is too wide and vague – it will result in subjective assessment by certification bodies.	To change wording “all applicable certification requirements” and “certification requirements” with a wording “all applicable requirements of this particular standard” OR “all applicable requirements of chain-of-custody certification” OR simply to add in the Vocabulary List a corresponding definition of what the “certification requirement” is.
1.1.2	T	It is sufficient to define the training measures required for the implementation of the procedure. Qualifications are not always suitable and can be a limitation for companies to implement the standard. Furthermore; who determines if the qualifications are adequate for the personnel responsible for the process?	Delete: qualifications and/or The organization shall define the personnel responsible for each procedure, together with the <b>qualifications and/or</b> training measures required for implementation of said procedure.
1.1.2	T	In de current 40-004 V2-1 it mentions a ‘training plan’. This is no longer part of the new draft. Dropping the requirement for a training ‘plan’ could affect how FSC certified companies are handling training in the future, for example when requirements change. It might be a good idea to include an element of ‘future action’, such as the required training plan in the current 40-004. In many cases certificate holders have not thought about what to do when there are any changes (both internal and external).	“together with the qualifications and/or training measures required for implementation” [added:] in a training plan “of said procedure”
1.1.2	G	From my previous job experience I would like to note that part “together with the qualifications and/or training measures” is almost never implemented. I also experienced difficulties in explaining to client that “qualification” is not the university degree, or certificate from courses. In fact, defining qualifications or developing training measures for small companies might be pretty challenging. Companies were arguing that they distribute responsibilities and it is clear that staff should know, what they are doing.	We would suggest withdrawing “together with the qualifications and/or training measures” and if needed put more emphasis on clause 1.3.1 to ensure that training is done properly and staff in fact knows the requirements.
1.2	E		Delete “Documented” from the title keeping only “procedures”.
1.2	E		Delete “Documented” from the title keeping only “procedures”.
1.2.1	E	This can be an administrative burden to small operations that use CoC standard.	Delete “Documented” keeping “procedures”.
1.2.1	E	The intent of requiring both ‘documented procedures’ and ‘work instructions’ in this clause is not clear. Many companies use the two terms interchangeably and others refer to work instructions as another type of documented procedure. In any event, both types of documents may not be required by the organization for ‘each applicable certification requirement’; suggest this should remain as an ‘and/or’ statement or just remove the reference to work	The organization shall implement and maintain documented procedures and/or work instructions covering all applicable certification requirements according to the scope of the certificate and adequate to the organization’s scale and complexity.

		instructions.	Or The organization shall implement and maintain documented procedures covering all applicable certification requirements according to the scope of the certificate and adequate to the organization's scale and complexity.
1.2.1	T	The phrase "adequate to the organisation's scale and complexity" is un-auditable	Delete
1.2.1	E	This can be an administrative burden to small operations that use CoC standard.	Delete "Documented" keeping "procedures".
1.2.1	E	Now "procedures and work instructions" shall be implemented and maintained. In some cases, because of the scale, the organisation does not require procedures and work instructions.	Add: /or The organization shall implement and maintain documented procedures and/or work instructions covering...
1.2.1	T	The expression "the organization's scale and complexity" leaves a lot of interpretation for readers of the standard.	Include criteria for this expression in 1.2.1 itself or add this expression to part E with underlying criteria like the ones we imagine is available in the CB evaluation standard.
1.2.1	T	There are some concerns with the new requirement here for maintaining DOCUMENTED procedures AND work instructions for all applicable requirements of the standard. In the existing requirements there must be procedures and/or work instructions, but it is not required that these all must be written out as well. The change in the draft will require certificate holders to write out all procedures and work instructions for all applicable parts of the standard, and this may add a higher level of administrative burden on the certificate holders to conform.	Review the necessity of requiring both documented procedures and work instructions. Determine if existing requirement is sufficient.
1.2.1		I generally agree with this proposed indicator, however I do have some concern using the word "documented". Many requirements are generally outlined in documented(or written) procedures. Having "documented" procedures for every action that may show compliance with FSC requirements will present an unreasonable administrative burden for certificate holders.	The Organization shall implement and maintain procedures and work instructions covering all applicable certification requirements according to the scope of the certificate and adequate to the organization's scale and complexity.
1.2.1	E	For clarification and to avoid repetitive, unnecessary descriptions of work procedures please add an 'or' between procedures and work instruction.	..maintain documented procedures and / or work instruction ...
1.2.1	T	The language changes to this requirement will add significant burden to the certificate holder while taking away the integrity of the audit process. The current standard adequately requires establishment and implementation of procedures and/or work instructions without requiring a documented process for each and every requirement. Such a request for excessive procedure documentation (and consequently updating of such procedures) often distracts the company and the auditor from the actual implementation of procedures, and turns attention to how procedures are written, updated and maintained.  In addition, many certified companies do not actively distinguish between procedures and work instructions, and work instructions are not defined in this standard.	Suggested revision: The Organization shall establish, implement, and maintain procedures and/or work instructions covering all applicable certification requirements according to the scope of the certificate and adequate to the organization's scale and complexity.
1.2.1	E	For clarification and to avoid repetitive, unnecessary descriptions of work procedures please add an 'or' between procedures and work instruction.	..maintain documented procedures and / or work instruction ...

1.2.1	G	Implement and maintain procedures and work instructions versus implement and maintain procedures and / or work instructions. This would appear to create a need to generate two distinct documents or leaves it open to interpretation that two separate documents are required. This in effect creates an additional administrative burden that does not appear to add any further controls in applying the standards	Leave previous wording and / or in place since procedures or work instructions are both tools to provide a standard method of accomplishing a task.
1.2.1	T	"... adequate to the organization's scale and complexity." How is "adequate" defined?	This may need categorizations for complexities. On the flipside, it will be good to keep the standard short.
1.2.1	E	"all applicable certification requirements" is vague and implies that other cert. standards are being added to the scope of the CoC Standard.	Keep the scope of the system requirements specific to the CoC Standard. If other Standards are relevant to a company, they will have additional procedures and audits to cover those other Standards.
1.2.1	T	It is more important to have and implement a procedure than have a written document. For example, auditors can adequately judge whether staff are trained via interviewing relevant staff during an audit. A training record does little to ensure successful procedure implementation. Don't require unnecessary documentation. Keep it simple.	Remove the word "documented" in "implement and maintain documented procedures covering..."
1.2.1	E	This can be an administrative burden to small operations that use CoC standard.	Delete "Documented" keeping "procedures".
1.2.1	G	This requirement to 'implement documented procedures and work instructions covering all applicable certification requirements' is a overburden for smaller organisations, and actually goes in the opposite direction of the promotion of lean and effective management systems, which should be seen as the best practice. We do not see the need to introduce this new requirement, as the balance between needed / sufficient written procedures should be evaluated by the independent auditors on a case by case basis.	Remove the word "documented" in the sentence of clause 1.2.1.: "The organization shall implement and maintain <b>documented</b> procedures..."
1.2.2	E	For the same reasons of the above.	Delete.
1.2.2	G	We are moving towards electronic controls, seems very old fashioned wording regards style of control. We understand the process and movement towards fewer records but the wording regards version control seems old.	
1.2.2	E	This can be an administrative burden to small operations that use CoC standard.	Delete.
1.2.2		The last approval date is really important and the version number is really important. In the past only an observation was possible. So I agree to this change.	
1.2.2	E		Delete.
1.2.2	G	This type of criterion adds unnecessary noise to a standard that is already too long. The importance isn't if the last approval date and version number is written on the procedures, the important thing is that the procedures cover the relevant issues and are well implemented.	Delete this section
1.2.2	E		Delete.
1.2.2	T	The intention of this requirement should be to make sure that latest version is used in each process. Current wording is only requiring the latest version to be specified. Specifying is only the first step towards meeting the intention of this requirement.	The last approval date and version number of the documented procedures shall be specified and used in each process.

1.2.2	T	We agree that it is important to know which version of procedures is the last one, when it was approved, etc. However depending on differences in record keeping procedures among companies, we would suggest to reformulate text and give possibility for organization to use other means of records showing when procedure was approved and which of them is valid. Companies might approve procedures by directors order, which has date, etc. Not fully clear, what added value does version number gives.	We would suggest to reformulate text by giving possibility for organization to use other means of records showing when procedure was approved and which of them is valid.
1.2.2	E	This can be an administrative burden to small operations that use CoC standard.	Delete.
1.2.2	G	The revision number and date is a requirement which makes all the sense for larger organisations with a significant amount of employees and internal documents. However, for smaller organisations this may become a overburden with little value-added. Again, we do not see the need to introduce this requirement, as this need should be evaluated by the independent auditors on a case by case basis.	Remove clause 1.2.2.
1.3.1	E	There is a pleonasm in this clause: measures defined in documented procedures	Delete: measures defined in the The organization shall train its staff to ensure that all applicable certification requirements and the <b>measures defined in the</b> documented procedures are correctly implemented.
1.3.1	G	A training does not seem to be per se a useful instrument to inform colleagues about relevant FSC aspects which they have to take into account to meet the FSC standard. In some cases, e.g. for colleagues from specific departments, a written information / instruction by E-mail could be more effective than a training. Furthermore, each company has its own culture and management processes to inform colleagues about relevant working procedures or changes in working steps. As a result, the organization should have the option to decide how to inform relevant colleagues about the FSC requirements. For FSC it should be sufficed that all relevant requirements are fulfilled. The way of implementation should not be part of the standard.	Delete this section and replace it by a new clause: The organization shall ensure by an adequate management system that all relevant FSC requirements are implemented and relevant colleagues are informed about relevant FSC procedures for them.
1.3.1	T	As suggested for 1.2.1, the requirement for documented procedures should be removed.	Suggested revision: The organization shall train its staff to ensure that all applicable certification requirements and the measures defined in the organization's procedures and/or work instructions are correctly implemented.
1.3.1	G	Training does not seem to be per se a useful instrument to inform colleagues about relevant FSC aspects which they have to take into account to meet the FSC standard. In some cases, e.g. for colleagues from specific departments, a written information / instruction by E-mail could be more effective than a training. Furthermore, each company has its own culture and management processes to inform colleagues about relevant working procedures or changes in working steps. As a result, the organization should have the option to decide how to inform relevant colleagues about the FSC requirements. For FSC it should be sufficed that all relevant requirements are fulfilled. The way of implementation should not be part of the standard.	Delete this section and replace it by a new clause: The organization shall ensure by an adequate management system that all relevant FSC requirements are implemented and relevant colleagues are informed about relevant FSC procedures for them.
1.3.1	E	You train your staff to the procedures and then audit to ensure they are correctly implemented. The way it is currently written is slightly back-to-front.	Suggest either change to 'The organisation shall train its staff in relevant procedures and requirements and ensure competency' or leave this unchanged from the previous standard.
1.3.1 & 2	G	This is a positive step, the real test of training is, do people understand, not a record of training	No change required

1.3.2	G	Training records are important and can show where gaps/potential problems could occur – is this requirement now covered by 1.4.1 instead?	
1.3.2	E	Badly worded	suggest a change to ‘All relevant staff shall demonstrate an awareness of and competence in implementing the organisations CoC procedures’
1.4.2	G	The requirement of all documents is a significant storage/administrative issue for large volume manufacturers. From a proactive standpoint, assuring that the supplier has an active certification and reviewing the invoice at time of transaction should be sufficient. The packing slip varies wildly from supplier to supplier and represents a delivery quantity - not a product quality or certification of input.	Eliminate the inclusion of “all” documents and offer an option to use either packing slip or invoice. This would be consistent with other standards that reference transactional data.
1.4.2	G	The requirement of all documents is a significant storage/administrative issue for large volume manufacturers. From a proactive standpoint, assuring that the supplier has an active certification and reviewing the invoice at time of transaction should be sufficient. The packing slip varies wildly from supplier to supplier and represents a delivery quantity - not a product quality or certification of input.	Eliminate the inclusion of “all” documents and offer an option to use either packing slip or invoice. This would be consistent with other standards that reference transactional data.
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1.4.2	G	What is the definition of “all records”?	Suggest that clarity be given regarding the minimum records that should be retained
1.4.2	E	Not all records shall be retained, only the records covering all applicable requirements of the standard.	Add: as mentioned in clause 1.4.1 Retention time for all records <b>as mentioned in clause 1.4.1</b> shall be at least five (5) years
1.4.2	T	Examples of records have been removed from 1.4.2, which makes it unclear which records should be kept.	Add examples of records that must be kept including delivery documents (which companies normally don’t store for a long time and therefore is important to mention) to 1.4.2
1.4.2	T & E	The change here to simplify the clause by removing the examples of the records may have made this requirement more complex. It may no longer be clear what records will need to be kept.	It may be helpful to include a reference to what types of records need to be kept by the organization.  For example: "Retention time for all records covering all applicable requirements of this standard shall be at least five (5) years" Including: - reports - purchases and sales documents - training records - production records - volume summaries

			- trademark approvals
1.4.2	G	The requirement of all documents is a significant storage/administrative issue for large volume manufacturers. From a proactive standpoint, assuring that the supplier has an active certification and reviewing the invoice at time of transaction should be sufficient. The packing slip varies wildly from supplier to supplier and represents a delivery quantity - not a product quality or certification of input.	Eliminate the inclusion of "all" documents and offer an option to use either packing slip or invoice. This would be consistent with other standards that reference transactional data.
1.4.2	G	The requirement of all documents is a significant storage/administrative issue for large volume manufacturers. From a proactive standpoint, assuring that the supplier has an active certification and reviewing the invoice at time of transaction should be sufficient. The packing slip varies wildly from supplier to supplier and represents a delivery quantity - not a product quality or certification of input.	Eliminate the inclusion of "all" documents and offer an option to use either packing slip or invoice. This would be consistent with other standards that reference transactional data.
1.4.2		This indicator should be clarified to only address records that pertain to the certification requirements.	Retention time for all records relating to certification requirements shall be at least five (5) years.
1.4.2	G	The requirement of all documents is a significant storage/administrative issue for large volume manufacturers. From a proactive standpoint, assuring that the supplier has an active certification and reviewing the invoice at time of transaction should be sufficient. The packing slip varies wildly from supplier to supplier and represents a delivery quantity - not a product quality or certification of input.	Eliminate the inclusion of "all" documents and offer an option to use either packing slip or invoice. This would be consistent with other standards that reference transactional data.
1.4.2	G	The requirement of all documents is a significant storage/administrative issue for large volume manufacturers. From a proactive standpoint, assuring that the supplier has an active certification and reviewing the invoice at time of transaction should be sufficient. The packing slip varies wildly from supplier to supplier and represents a delivery quantity - not a product quality or certification of input.	Eliminate the inclusion of "all" documents and offer an option to use either packing slip or invoice. This would be consistent with other standards that reference transactional data.
1.4.2	G	The term "all records" is too broad.	Narrow the scope to say all records necessary to demonstrate conformance to the standard.
1.4.2	G	The requirement of all documents is a significant storage/administrative issue for large volume manufacturers. From a proactive stand point, assuring that the supplier has an active certification and reviewing the invoice at time of transaction should be sufficient. The packing slip varies wildly from supplier to supplier and represents a delivery quantity – not a product quality or certification of input.	Eliminate the inclusion of "all" documents and offer an option to use either packing slip or invoice. This would be consistent with other standards that reference transactional data.
1.4.2	T	"All records" should be made clear that it is only related to FSC CoC.	Retention time for all records specified in 1.4.1 shall be at least five (5) years.
1.4.2	G	The requirement that all documents be maintained for 5 years is a significant storage / administrative issue. Many of these documents have mandated requirements by law to be kept for a number of	Documents not legally required to be retained shall be retained for a period of 3 years or until audited by

		years such as shipping / sales documents.	the Certification Body
1.5	G	ILO Issue: In order for the FSC CoC to be functional in the U.S. context the language must be changed to be consistent with laws and regulation in the U.S and Canada.	Utilize the language developed by the U.S Industry working group.
1.5	G	Evergreen discourages the continued incorporation of the ILO Core Conventions in this Chain of Custody Standard by referencing FSC-POL-01-004 Policy For Association of Organizations with FSC. We would not be able to abide by these conventions and US law. It is unreasonable and infeasible to require certificate holders and their suppliers to comply with ILO Core conventions that have not been ratified by the countries in which they operate	
1.5	G	It is acknowledged that a Policy for Association working group is currently dealing with issues surrounding members and this policy. The standards for auditing should only at most include that the auditor check for a signed policy on file. A demonstrated commitment to certification is not an auditable criteria and open for large interpretation.	
1.5	G	Rainforest Alliance is highly supportive of the ILO and Policy for Association working groups. We look forward to reviewing the draft product of these groups.	N/A
1.5.1	G	ILO Core Convention Issue: We wish to note that much work is yet to be done to bring this issue to a satisfactory solution. Based upon certain actions made by the trade union federation, BWI, the FSC working group process will take time and meaningful consultation with FSC to complete in a mutually acceptable manner. While the parties have worked very hard to achieve a consensus solution to the issue, the employers, which are largely the only entities expected to comply with the FSC ILO solution, have been given the impression that the process as defined thus far needs to be improved. We are committed to a successful solution that can be secured through meaningful consultation with FSC, and are currently waiting for the FSC Board and Secretariat to schedule a meeting to continue this process. AF&PA continues to take the position that application of ILO Conventions to private parties in lieu of governments is an incorrect application of ILO Core Conventions in this Chain of Custody Standard by referencing FSC-POL-01-004 Policy For Association of Organizations with FSC These conventions are designed to apply to governments and not to private parties. Private parties are obligated to comply with laws at the national level. It is unreasonable and inappropriate to expect certificate holders and their suppliers to comply with ILO Core conventions.	
1.5.1	G	With regard to FSC standards in general, and the new CoC, any reference to ILO is a no go for US manufacturers. Specifically, 1.5.1, which references FSC-POL-01-004 which references the ILO Declaration on Fundamental Principles and Rights at Work; which in turn references the Philadelphia Declaration and Social Justice Declaration. In short, Columbia cannot comply with the FSC's Policy of Association as referenced by the new CoC. The US only ratified 2 of the 8 basic ILO conventions.	In general, FSC needs to specify an indicator, and not just include international documents that reference other international documents. Indicators for each ILO standard that they want to incorporate would enable clearer execution of what FSC seeks to attain without reference to these standards of engagement between sovereign nations which are difficult for CBs to audit against. Also difficult to comment on this section without understanding outcome of the ILI working group.



1.5.1	E	The scope of the COC standard should be limited to chain of custody issues (e.g., tracking materials, making claims, labeling, etc.). The Policy for Association may be referenced within the document as another applicable FSC normative document, but there should be no stated requirements within the COC standard unless these requirements can effectively be audited by a COC-qualified auditor (for example existence of a self-declaration). Other than existence of a signed self-declaration, Indicator 1.5.1 as written is simply unauditable, e.g. because the Policy for Association involves such issues as HCVF, ILO conventions, legality, human rights, etc.	Delete 1.5.1
1.5.1	E	It is very unclear what is meant by “demonstrate its commitment to the FSC values” as this implies more than the actual requirement (to sign policy of association).	Rephrase this 1.5.1 to what is actually meant with this requirement: The organization shall commit itself not to be directly or indirectly involved in the following unacceptable activities as defined in FSC-POL-01-004 Policy for Association of Organizations with FSC by signing a self-declaration. OR make this requirement auditable by including criteria or a note like it is done 1.5.2
1.5.1	G	The scope of the COC standard should be limited to chain of custody issues (e.g., tracking materials, making claims, labeling, etc.). The Policy for Association may be referenced within the document as another applicable FSC normative document, but there should be no stated requirements within the COC standard unless these requirements can effectively be audited by a COC-qualified auditor (for example existence of a self-declaration). Other than existence of a signed self-declaration, Indicator 1.5.1 as written is simply unauditable, e.g. because the Policy for Association involves such issues as HCVF, ILO conventions, legality, human rights, etc.	Given this, item 1.5.1 should be deleted. In order to capture the intent of the requirement, we suggest adding a new NOTE, e.g. NOTE: All FSC certificate holders, including chain of custody certificate holders, are required to demonstrate commitment to FSC values as outlined in the FSC-POL-01-004 FSC Policy for Association of Organizations with FSC.
1.5.1	G	It is of no use to ask for comments on a document that is currently under revision respectively not publically available at all.	
1.5.1	E	ILO Core Convention Issue: FSC continues to incorporate the ILO Core Conventions in this Chain of Custody Standard by referencing FSC-POL-01-004 Policy For Association of Organizations with FSC. These conventions are inconsistent with national law in a number of countries, including the U.S., Canada, and Mexico. It is unreasonable and infeasible to require certificate holders and their suppliers to comply with ILO Core conventions that have not been ratified by the countries in which they operate. We understand there are working groups attempting to revise this document, which is necessary for the FSC Chain of Custody standard to be functional in the U.S.	
1.5.1	G	It is of no use to ask for comments on a document that is currently under revision respectively not publically available at all.	
1.5.1	G	It is of no use to ask for comments on a document that is currently under revision respectively not publically available at all.	

1.5.1		<p>The scope of the COC standard should be limited to chain of custody issues. The Policy for Association may be referenced within the document as another applicable FSC normative document, but there should be no stated requirements within the COC standard unless these requirements can effectively be audited. Indicator 1.5.1 should be deleted.</p> <p>In regard to the ILO Core Convention Issue, much work is yet to be done to bring this issue to a satisfactory solution. The FSC Board's approved working group process should be pursued. Considerable delay and roundabout tactics have been employed to side-line this approved process with no resolution.</p> <p>Application of ILO Conventions to private parties in lieu of governments is an incorrect application of ILO Core Conventions in this Chain of Custody Standard by referencing FSC-POL-01-004 Policy For Association of Organizations with FSC. These conventions are designed to apply to governments and not to private parties. Private parties are obligated to comply with laws at the national level. It is unreasonable and inappropriate to expect certificate holders and their suppliers to comply with ILO Core conventions.</p>	Indicator 1.5.1 should be deleted.
1.5.1	G	All further implementation of this requirement need to follow the guidance of the chamber-balanced working group.	This indicator needs to be written more clearly to indicate that specific indicators will be developed to make it clear how organizations will demonstrate their commitment to FSC-POL-01-004. It also should be clear in the standard (not just in a note for stakeholders) that these indicators are being developed by a chamber-balanced working group.
1.5.1	G	The ILO issue is still under discussion with some major stakeholders. There is a formal process in place to address it, and that process should be adhered to. Until the issue is resolved, caution should be exercised in putting this in the standard, or there should be continued temporary formal exemption from FSC for this requirement.	
1.5.1		<p>ILO Core Convention Issue: RockTenn wishes to acknowledge the effort put forth to date but notes that more work needs to be done to bring this issue to a satisfactory solution.</p> <p>RockTenn supports the position expressed by the U.S. and Canadian industry group and the AF&amp;PA that direct application of ILO Conventions to private parties in lieu of governments is inappropriate and an incorrect application of ILO Core Conventions. These conventions are designed to apply to governments and not to private parties. Private parties are obligated to comply with laws at the national level. It is unreasonable and inappropriate to expect certificate holders and their suppliers to comply with ILO Core conventions, especially when the conventions conflict with national laws.</p>	Delete or remove direct application of ILO Conventions to private parties.
1.5.1	G	it is of no use to ask for comments on a document that is currently under revision respectively not publically available at all.	
1.5.1	G	It is of no use to ask for comments on a document that is currently under revision respectively not publically available at all. Content is still not clear.	
1.5.1	G	It is of no use to ask for comments on a document that is currently under revision respectively not publically available at all.	
1.5.1	G	It is of no use to ask for comments on a document that is currently under revision respectively not publically available at all.	

1.5.1 & 1.5.2		<p>ILO Core Convention Issue: GPI would like to note that, although there has been a lot of work on this issue, much work is yet to be done to bring this issue to a satisfactory solution. Based upon certain actions made by several stakeholders, the FSC working group process on this subject has lost a certain amount of credibility which will take time and meaningful consultation with FSC to rebuild. While the parties have worked very hard to achieve a consensus solution to the issue, employers like GPI, which are largely the only entities expected to comply with the FSC ILO solution, have been given the impression that the process as defined thus far is unfair. We are currently waiting for the FSC Board and Secretariat to schedule a meeting with the employers and work to re-establish trust and confidence in the process that has been lost.</p> <p>GPI continues to take the position that application of ILO Conventions to private parties in lieu of governments is an incorrect application of ILO Core Conventions in this Chain of Custody Standard by referencing FSC-POL-01-004 Policy For Association of Organizations with FSC. These conventions are designed to apply to governments and not to private parties. Private parties are obligated to comply with laws at the national level. It is unreasonable and inappropriate to expect certificate holders and their suppliers to comply with ILO Core conventions.</p> <p>We understand that occupational health and safety issues are also expected to be addressed in a revised Policy for Association. A requirement of “commitment to occupational health and safety” poses many challenges of auditability, scope of the standard, and liability. For example, auditor qualifications for determining health and safety compliance are markedly different from current FSC COC auditor qualifications. Also, if FSC accredited auditors are expected to be health and safety experts, this may require additional accreditation (e.g. OSHA in the US), as well as expose the certifying bodies to new liability if health and safety violations go unnoticed by auditors.</p>	<p>To satisfactorily resolve this issue will require a group of stakeholders to come together, in a good faith effort, to find a workable solution that addresses the fundamental concerns that the introduction of the ILO Core Conventions are attempting to address without extending substantially beyond the core mission of the FSC.</p> <p>A potential solution for Occupational Health and Safety is for certificate holders to reference evidence of commitment to this concern by internal or external audits, company policy statements.</p>
1.5.2	E	<p>1.5.2 note This note is destined to CB for them to determine the level of auditing.</p>	Delete.
1.5.2	E	<p>The note is discussing occupational health and safety under a ‘quality management system’. Many companies have a formal Environmental, Health and Safety registered management system as stand alone - or in conjunction with - a quality management system; suggest removing quality from the term to refer more generically to management systems.</p>	Suggest removing quality from the term “quality management system” to refer more generically to management systems.
1.5.2	T	<p>FSC will need to define what objective evidence will be sufficient to demonstrate commitment to H &amp; S in each case. Again, how can this clause be audited?</p>	Delete
1.5.2	G	<p>Why are FSC trying to structure OH&amp;S which is a statutory requirement in the UK anyway?</p>	Should be removed and let companies operate to local/international standard requirements
1.5.2	E	<p>1.5.2 note This note is destined to CB for them to determine the level of auditing.</p>	Delete.
1.5.2	E	<p>1.5.2 note</p>	Delete.
1.5.2	G	<p>We are all for health and safety requirements in the CoC standard and would like to see much more rigorous requirements on this issue, as we find it important and believe that consumers already automatically assumes that these requirements aren’t only applicable in FSC certified forests, but all through the FSC supply chain. In the current form, the criterion means absolutely nothing and might as well be deleted.</p>	Either delete it or make it more detailed and rigorous

1.5.2	G	We understand that occupational health and safety issues are also expected to be addressed in a revised Policy for Association, and as such believe that 1.5.2 should be deleted and replaced by the NOTE suggested in proposed change above for 1.5.1. Also, a requirement of “commitment to occupational health and safety” poses many challenges of auditability, scope of the standard, and liability. For example, auditor qualifications for determining health and safety compliance are markedly different from current FSC COC auditor qualifications. Also, if FSC accredited auditors are expected to be health and safety experts, this may require additional accreditation (e.g. OSHA in the US), as well as expose the certifying bodies to new liability if health and safety violations go unnoticed by auditors.	The best solution is to to remove Indicators 1.5.1 and 1.5.2. and reference the Policy for Association in the NOTE suggested in the comments for 1.5.1 (NOTE: All FSC certificate holders, including chain of custody certificate holders, are required to demonstrate commitment to FSC values as outlined in the FSC-POL-01-004 FSC Policy for Association of Organizations with FSC). It is our understanding that the revised Policy for Association will tackle elements of when and where audit teams must address worker health and safety.
1.5.2	G	Too vague and recommend increasing the level of health and safety requirements in the CoC standard. This is important because we believe these requirements should also be applied throughout the FSC supply chain and consumers likely have the same expectation.	Make it more detailed and rigorous
1.5.2	G	The standard of Chain of Custody is here to demonstrate that in all the chain the system is not unbroken. So with this requirement about Health & Safety, FSC goes too far and if Certification body realize a good audit this is an ISO18000 certificate or OSHA 8800.	Need to reduce the scope for HS with PPE and risk assessment
1.5.2	G	We question whether the note is necessary or appropriate. Is the purpose of the note to create different levels of conformance base upon subjective interpretation? If so, that is not appropriate, as all certificate holders should be measured against the same criteria.	
1.5.2	G	Why are FSC trying to structure OH&S which is a statutory requirement in the UK anyway?	Should be removed and let companies operate to local/international standard requirements
1.5.2	G	The sliding scale in regards to requirements to train and document health and safety is too vague. The whole concept of adding health and safety to a chain of custody standard is out of place and is expanding the scope of CoC beyond a reasonable measure. There are established health and safety standards (OHSAS 18001). Health and safety are legally required in North America. Meeting the legal requirements should be sufficient. There are existing mechanisms in place to ensure health & safety. Companies that perform poorly are legally prosecuted and tend to pay much higher insurance premiums.	Where legal minimums are established in a country/ region, companies should be able to simply establish a policy to comply with the law. Remove additional requirements.
1.5.2	T	Delete 1.5.2 - this is CofC standard not a Health and Safety management system - it does not make sense to include H&S requirements but to be silent on environmental or wider social requirements. CH's already required to be committed to FSC values. Where is the evidence that this requirement has delivered value in previous audits?	Delete 1.5.2
1.5.2	T	The Note in this clause is guidance for CB's	Delete or move to FSC-STD-20-001
1.5.2 note	E		Delete.
1.5.2 note	E	This note is destined to CB for them to determine the level of auditing.	Delete.
1.5.2.	T	The specified NOTE does not really make this indicator more clear for understanding. It is still too vague. It should refer to some specific level of safety requirements – e.g. ILO conventions.	To remove this indicator as soon as there is already general requirement on compliance to the ILO conventions in the FSC-POL-01-004

1.6 c	G	Complaints : don't ask 2 month to investigate and action plan because for some case it's not possible to see forest owner in the 2 months and if there is insurance systeme action plan could take more time.	Just ask that the system need to be manage.
1.6	T	Complaints: The indicator is written with strict deadlines without any consideration for the size or complexity of the complaint issue. In large organizations a rigorous investigation can take several months to adequately address.	Provide a more reasonable response timetable.
1.6	G	Simplify and streamline – combine complaints with non-conforming products The standard should not seek to be overly prescriptive – simply require the organisation to define roles and responsibilities and have an adequate system in place for dealing with complaints and non-conforming products – proportionate to scale, intensity and risk. This can then be checked at audit. There is a risk of this clause, in its current format being “over-interpreted” by C.B.s – for example - when is an enquiry actually a complaint. Place emphasis on organisation to define a process without being over prescriptive.	Combine 1.6 and 1.7 - complaints with non-conforming products. Re write 1.6 Complaints and control of non conforming products. 1.6.1 The organization shall define the controls, and related responsibilities and authorities for receiving, handling, and recording complaints and non-conforming products, relating to this standard. Delete the rest of 1.6 and 1.7
1.6	G	FSC Russian National Office (FSC Russia) supports the initiative of specifying the procedure of addressing complains and including it in the text of the standard. The procedure is clearly described and well understood by members of the National Standard Development Group and Stakeholders.	No change required
1.6	E	Clauses 1.6 and 1.7 should be condensed into a single clause 1.6 as the extensive detail serves to complicate implementation without adding value to the standard	Clause 1.6 changed to Complaints “and control of non-conforming products.” Delete 1.6.1 a) through c) and lead with d) “The organization shall take..” Delete 1.6.1. e) and all of Clause 1.7.
1.6	T	Complaints Too detailed text and procedures that do not really improve the credibility of the FSC system.	Remove a-e and use the NOTE as 1.6.2 If FSC must decide how to handle complaints in detail. Then at least remove b and c.
1.6	T	Complaints To detailed text and procedures that do not really improve the credibility of the FSC system.	Remove a-e and use the NOTE as 1.6.2 If FSC must decide how to handle complaints in detail. Then at least remove b and c.
1.6		Complaints: This new complaints section contains strict deadlines and adds an unknown level of additional burden on COC holders while providing little benefit to FSC. Further, the proposed process for dealing with complaints is very short and does not provide the necessary flexibility for a company to review and respond to what may be complex complaints requiring additional review and/or investigation. FSC should provide a more reasonable timeframe for investigating and responding to complaints.	FSC must review this section to reduce the potential level of burden and remove the open ended nature of 1.6 as it currently exists. This could be done by providing additional details as to the level of response required and increasing the time available to respond to reduce the burden of such a requirement.
1.6.1		If there is a mistake and non FSC material arrives at a location that cannot maintain the chain of custody, is the complaint process necessary? Internally, the corrective action should be taken. However, notifying a customer that did not request FSC nor can maintain the coc seems to be cumbersome.	I would like to propose that the complaint process be enforced when the customer is requesting FSC material, the Customer is FSC certified, or it is to an end user that will be the last person in the COC chain.

1.6.1	G	<p>Complaints: This new complaints section contains strict deadlines and adds an unknown level of additional burden on COC holders while providing little benefit to FSC.</p> <p>Further, the proposed process for dealing with complaints is very short and does not provide the necessary flexibility for a company to review and respond to what may be complex complaints requiring additional review and/or investigation. FSC should provide a more reasonable timeframe for investigating and responding to complaints.</p>	FSC must review this section to reduce the potential level of burden and remove the open ended nature of 1.6 as it currently exists. This could be done by providing additional details as to the level of response required and increasing the time available to respond to reduce the burden of such a requirement.
1.6.1	T	Requirement for complaints procedure welcomed by BM TRADA but it is overly prescriptive	
1.6.1	T	The authorities shall be defined of receiving, handling and recording complaints together with the responsibilities. This could be a limitation for filing a complaint into the system and is therefore not adding credibility to the system. It is better to keep all channels open for filing a complaint.	Delete: and authorities The organization shall define the controls and related responsibilities <b>and authorities</b> for receiving, handling, and recording complaints relating to conformity with certification requirements, including the following minimum requirements:
1.6.1		Complaints: Requirements are too detailed. Too much bureaucracy for minor events such as a missing COC code if everything else is perfect. Failures like this can be cleaned out with a simple phone call to be supplier or e-mail exchange.	
1.6.1	E	The important thing isn't that the organization has defined control and related responsibilities; the important thing is that the organisation handles complaints in an adequate and timely manner.	1.6.1 The organization shall define the controls and related responsibilities and authorities for receiving, handling, and recording complaints relating to conformity with certification requirements. 1.6.2 The organization shall handle complaints in an efficient and timely manner, in accordance with the following minimum requirements: a), b), c) ...
1.6.1	E	What is important is that the organisation handles complaints in an adequate and timely manner and notifies its CB and its relevant FSC regional/national office of the complaint(s), rather than the organization has defined control and related responsibilities.	1.6.1 The organization shall define the controls and related responsibilities and authorities for receiving, handling, and recording complaints relating to conformity with certification requirements. Also recommend adding equivalent requirement FSC-STD-40-005 V3 (2nd draft submitted for consultation) so there is consistency of handling complaints within the FSC system and CBs and FSC has an overview of complaints: Specific text from (40-005V3) 3.2 f) For forwarding substantial complaints to the responsible FSC-accredited certification body and relevant FSC National Office within two (2) weeks of receipt of the complaint; m) For informing the complainant, the responsible FSC-accredited certification body and the relevant FSC National Office of the results of the complaint, and any actions taken

			towards its resolution, and maintaining copies of relevant correspondence; 1.6.2 The organization shall handle complaints in an efficient and timely manner, in accordance with the following minimum requirements: a), b), c) ...
1.6.1	G	<p>To a better definition of scope regarding to complaints, is necessary to define the goals of a complaint mechanism and the target public to be engaged.</p> <p>What kind of complaint is relevant to the traceability process? Quality issue should not be relevant to this process.</p> <p>The inclusion of new requirements shall be well evaluated and maintained only if there are clearly benefits to the traceability maintenance that could be verified. Otherwise, the risk of diverting the purpose of the CoC audit by the CB will increase, wasting time with the analysis requirements that do not add to the traceability issues.</p> <p>Also, a complaint mechanism that is not disclosed to the target public, probably will not work for the purpose for which it was created</p>	<p>Define exactly the relevant complaints to traceability process, with examples of applicable complaints and clarify that product/material quality, price, delivery timeline and other quality manner are not part of the possible complaints scope</p> <p>Define the FSC-STD-40-004 requirements applicable to the complaints, like 1.5,1.7, 10,12.</p> <p>Insert specific information on FSC-STD-20-011 to to strengthen the homogeneity regarding to the CB implementation process</p>
1.6.1		<p>This new complaints section contains strict deadlines and adds an unknown level of additional burden on COC holders while providing little benefit to FSC.</p> <p>The proposed process for dealing with complaints is very short and does not provide the necessary flexibility for a company to review and respond to what may be complex complaints requiring additional review and/or investigation. FSC should provide a more reasonable timeframe for investigating and responding to complaints.</p> <p>FSC must review this section to reduce the potential level of burden and remove the open ended nature of 1.6 as it currently exists. This could be done by providing additional details as to the level of response required and increasing the time available to respond to reduce the burden of such a requirement.</p>	<p>The Organization shall define the controls and related responsibilities and authorities for receiving, handling and recording valid written complaints relating to conformity with certification requirements, including the following minimum requirements:</p> <ul style="list-style-type: none"> <li>a) Acknowledge receipt of complaints;</li> <li>b) Provide initial response to the complainant;</li> <li>c) Investigate the complaint and specify its proposed actions in response to the complaint;</li> <li>d) Take appropriate actions with respect to complaints and any deficiencies found in products that affect conformity with the requirements for certification;</li> <li>e) Notify the complainant when the complaint is considered to be closed.</li> </ul>
1.6.1	T	Complaints procedures do not require CB notification. This can be a beneficial notification process to ensure that all complaints within an audit period are reviewed at the annual evaluation.	Add required CB notification within 2 weeks of receiving a complaint.

1.6.1	G	<p>It should be clarified how this direction relates to the established and otherwise formalized FSC Complaints Procedure, which has significant duplication of, but some inconsistencies with, these requirements. Furthermore, it can be common that complaints, and the subject of complaints, submitted to any one particular certificate holder are not unique to the particular certificate; rather, they have significant relevance provincially, nationally, or perhaps internationally. Part of the investigation of any complaint must include identification of any specific aspects of the complaint that are deserved of investigation by FSC International to ensure consistency and equality in the interpretation and implementation of the standard. This is imperative to ensure that complaints are not used as a means to single out or unilaterally burden a specific certificate holder on matters that are equally applicable more broadly.</p> <p>The specified time periods of 2 weeks in item b and 2 months in item c are too short. With suggest make it consistent with the FSC Complaint Procedure. (FSC-PRO-01-009)</p>	
1.6.1	T	There are always people who makes unreasonable complaint for many reasons. Sometimes they just do not like the company and so makes any sorts of complaints. It will be too time consuming to deal with these properly according to the requirements in 1.6.1.	I suggest adding a step after a) to judge if it is a reasonable complaint or not. Any rejected complaint shall be recorded for CBs to judge if they are really unreasonable or not.
1.6.1	T	d) and e) need a specified timeline too.	3 months for d) and 2 weeks from the end of d) to e).
1.6.1	T	Inconsistency between the content of e) and Note. E) asks CHs to notify complainant after closure of the complaint. Note says in order to close the complaint, CHs need to respond to the complainant.	Note is basically repeating the contents mentioned above. So I suggest removing the note.
1.6.1	G	Definition of “complaint” and process outlined establishes no guidance on when a complaint is serious and legitimate, or frivolous. It is unclear when an inquiry rises to the level of an expression of dissatisfaction. Organization and complainant have no recourse if the issue is not resolved during the process described in 1.6.1	Define if and when a CB needs to be notified.
1.6.1	G	Requirement is clear, however we would suggest to modify it by combining with requirements from FSC-STD-40-005 clause 14 (Complaints mechanism). It would be confusing to have two different procedures for CoC and CW complaints.	We would suggest to combine requirements of CoC and CW standards to one clause.
1.7		<p>1.7- Non-conforming products</p> <p>This provision could trigger the equivalent of a product recall in the event that credits were withdrawn or claimed from an inactive certificate. There is also a potential risk on the controlled wood side. If an input were disallowed, it could contaminate a large production run. FSC US has said that they do not believe that this is a risk and it is not the intention of this section of the standard. This should be made explicit because it is open to CB interpretation now and could be very negative. This is also a very significant issue on the solid wood side. The reputational risk associated with a product recall is difficult to justify given the demand for FSC. This should be limited to notifying the CB of the issue and developing a correction plan. Products already transferred should not be subject to recall as this could cascade multiple steps down the supply chain and be implemented well after a product has been consumed.</p>	
1.7	T	Non-conforming product with shared credit account will need specific and a timely manner measures to control the impact and coverage. The requirement 1.7 is not clear about the needed control measures to these products.	Specify control measures to be adopted in case of NC product in shared credit account
1.7	G	Control of Non-conforming product. Simply too complicated with no positive advantages	Whole section from 1.7 to 1.7.3d) should be removed completely. It's too detailed and only serves to confuse.



1.7.1	T	Requirement part “related responsibilities and authorities for dealing with non-conforming products” is in fact duplicating clause 1.1.2. It is possible to all requirements add that responsible staff shall be appointed however, this is already required by 1.1.2 and only makes standard more difficult to read.	We would suggest to avoid duplicating requirements.
1.7.2	E	The CoC system shall not only be designed to exclude non-FSC products, it shall actually do it.	The organization’s chain of custody system effectively ensure that products which do not conform with FSC requirements are identified and controlled to prevent unintended delivery of said products.
1.7.2	E	The CoC system shall actually exclude non-FSC products.	The organization’s chain of custody system shall ensure that products which do not conform to FSC requirements are identified and controlled to prevent unintended delivery of those products.
1.7.2	T	The organization’s chain of custody system. Current wording implies that The Organization has only a single chain of custody.	The organization’s FSC chain of custody system. The organization may have multiple supply chains with CoC, of which FSC is only one.
1.7.2	G	All the requirements in the standard are aimed to ensure that products which do not conform with FSC requirements are not sold as FSC certified. What could be the situation, when non-compliance by CB would be identified only referring to this clause? To our mind, this requirement does not give any added value and only makes standard more complicated to read.	We would suggest to avoid requirements, which do not give any added value.
1.7.2	G	This section needs to be extended. There is no indication of what to do with the now detained non-conforming product. Essentially this is a non-conforming product that has been identified before delivery. There needs to be a process to follow as for 1.7.3.	Include reference to 1.7.3 c) Analyse causes for occurrence of non-conforming products, and implement measure to prevent their reoccurrence Additional reference for that specific detained product that if non-conformity can be satisfactorily addressed that the product can go for resale?
1.7.3	G	Product non-conformance: The current wording of this section raises non conformances to a level higher than a recall. It is not possible in all circumstances to notify customers of non conformances. This language should be clarified such that all relevant business to business customers are notified of any non-conforming product.	Change “all relevant customers” to “all relevant business to business customers.”
1.7.3	G	CEPI welcomes the prolonged timeframe to 5 working days for notifying a non-conforming product identification.	
1.7.3	G	Step 1.6.1. dictates that the COC holder develop a corrective action mechanism. Step 1.7.3. appears to indicate that all non-conformances must also be immediately reported to the certification body. There should be a consideration of severity or frequency before the certification body is involved. The use of the word “delivered” impacts this significantly. As an example ... if, as a fabricator, we receive a truck load of composite panels tagged as FSC Mix Credit and the invoice does not reflect the same claim, technically this is a non-conformance. Contacting the supplier to correct and resubmit the invoice would resolve the issue without the need to involve / wait on the certifying body. The same situation could occur if a packing slip were lost in transit off an inbound rail car.	Drop the requirement 1.6.1. as this is a duplicate of this step

1.7.3	G	Step 1.6.1. dictates that the COC holder develop a corrective action mechanism. Step 1.7.3. appears to indicate that all non-conformances must also be immediately reported to the certification body. There should be a consideration of severity or frequency before the certification body is involved. The use of the word “delivered” impacts this significantly. As an example ... if, as a fabricator, we receive a truck load of composite panels tagged as FSC Mix Credit and the invoice does not reflect the same claim, technically this is a non-conformance. Contacting the supplier to correct and resubmit the invoice would resolve the issue without the need to involve / wait on the certifying body. The same situation could occur if a packing slip were lost in transit off an inbound rail car.	Drop the requirement 1.6.1. as this is a duplicate of this step
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1.7.3	G	Step 1.6.1. dictates that the COC holder develop a corrective action mechanism. Step 1.7.3. appears to indicate that all non-conformances must also be immediately reported to the certification body. There should be a consideration of severity or frequency before the certification body is involved. The use of the word “delivered” impacts this significantly. As an example ... if, as a fabricator, we receive a truck load of composite panels tagged as FSC Mix Credit and the invoice does not reflect the same claim, technically this is a non-conformance. Contacting the supplier to correct and resubmit the invoice would resolve the issue without the need to involve / wait on the certifying body. The same situation could occur if a packing slip were lost in transit off an inbound rail car.	Drop the requirement 1.6.1. as this is a duplicate of this step
1.7.3	T	Non-conforming products	b) Notify its certification body and all relevant direct customers in writing within five (5) business days of the non-conforming product investigation conclusion and maintain records of the notification.
1.7.3	G	CEPI welcomes the prolonged timeframe to 5 working days for notifying a non-conforming product identification.	
1.7.3	G	1.7.3: Control of Non-Conforming Products More open discussion required around this requirement. What is the downstream client supposed to do with this information? This section implies a recall but stops short (fortunately). Columbia is not presently certain how its CB would interpret this standard. We had, for example, a certification body fail to update a CH code on info.fsc.org. We had millions of dollars of inventory on hand, and orders we were about to ship. In the end it turned up to be an error by the CB which we discovered, but had we been forced into a recall, there would have been grave financial damage and frankly we would probably have sought to recover these damages from the offending CB. This entire requirement, borne out of EUTR, needs a more thorough treatment.	Provide clearer instructions on what to do if notified of a non-conforming input.  Does the input get returned, a new price negotiated?  Real unclear at this point...further background on EUTR, Lacey needed.  We do value FSC as an instrument of due care and support features which align FSC with due care mechanisms already identified out there.

1.7.3	G	ETS welcomes the prolonged timeframe to 5 working days for notifying a non-conforming product identification.	
1.7.3	T	Describe who can detect the NC-products	Where the responsible person/personnel, internal or external auditor, or any relevant stakeholder detect non-conforming products after they have been delivered, the organization shall: a. Immediately cease selling any non-conforming products held in stock; b. Notify its certification body and sends copies of all invoices containing non-conforming products to the certification body. c. Notify all relevant customers in writing within 5 business days from the identification of the non-conforming products and maintain a record including the receipt notification of the customer. d. "same as current c" e. "same as current d"
1.7.3	G	Not applicable for B2C relations. Together with the certifications body appropriate actions should be adjusted.	
1.7.3	G	Step 1.6.1. dictates that the COC holder develop a corrective action mechanism. Step 1.7.3. appears to indicate that all non-conformances must also be immediately reported to the certification body. There should be a consideration of severity or frequency before the certification body is involved. The use of the word "delivered" impacts this significantly. As an example ... if, as a fabricator, we receive a truck load of composite panels tagged as FSC Mix Credit and the invoice does not reflect the same claim, technically this is a non-conformance. Contacting the supplier to correct and resubmit the invoice would resolve the issue without the need to involve / wait on the certifying body. The same situation could occur if a packing slip were lost in transit off an inbound rail car.	Drop the requirement 1.6.1. as this is a duplicate of this step
1.7.3	G	Step 1.6.1. dictates that the COC holder develop a corrective action mechanism. Step 1.7.3. appears to indicate that all non-conformances must also be immediately reported to the certification body. There should be a consideration of severity or frequency before the certification body is involved. The use of the word "delivered" impacts this significantly. As an example ... if, as a fabricator, we receive a truck load of composite panels tagged as FSC Mix Credit and the invoice does not reflect the same claim, technically this is a non-conformance. Contacting the supplier to correct and resubmit the invoice would resolve the issue without the need to involve / wait on the certifying body. The same situation could occur if a packing slip were lost in transit off an inbound rail car.	Drop the requirement 1.6.1. as this is a duplicate of this step
1.7.3		The current wording of this section raises non-conformances to a level higher than a recall. It is not possible in all circumstances to notify customers of non-conformances. This language should be clarified such that all relevant business to business customers are notified of any non-conforming product.	Change "all relevant customers" to "all relevant business to business customers."

1.7.3	G	Step 1.6.1. Dictates that the COC holder develop a corrective action mechanism. Step 1.7.3. Appears to indicate that all non-conformances must also be immediately reported to the certification body. There should be a consideration of severity or frequency before the certification body is involved. The use of the word “delivered” impacts this significantly. As an example ... if, as a fabricator, we receive a truck load of composite panels tagged as FSC Mix Credit and the invoice does not reflect the same claim, technically this is a non-conformance. Contacting the supplier to correct and resubmit the invoice would resolve the issue without the need to involve / wait on the certifying body. The same situation could occur if a packing slip were lost in transit off an inbound rail car.	Drop the requirement 1.6.1. as this is a duplicate of this step
1.7.3	G	Step 1.6.1. dictates that the COC holder develop a corrective action mechanism. Step 1.7.3. appears to indicate that all non-conformances must also be immediately reported to the certification body. There should be a consideration of severity or frequency before the certification body is involved. The use of the word “delivered” impacts this significantly. As an example ... if, as a fabricator, we receive a truck load of composite panels tagged as FSC Mix Credit and the invoice does not reflect the same claim, technically this is a non-conformance. Contacting the supplier to correct and resubmit the invoice would resolve the issue without the need to involve / wait on the certifying body. The same situation could occur if a packing slip were lost in transit off an inbound rail car.	Drop the requirement 1.6.1. as this is a duplicate of this step
1.7.3	G	Rainforest Alliance agrees that CBs shall be notified of non-conforming product within a timely manner, therefore we suggest 3 business days. We do not agree with the timeline of notifying all relevant customers within 5 days. Certificate Holders need more to investigate the root cause and severity of the issue, before a determination and public statement of a non-conforming product can be made. Certificate Holders should not be required to make a public statement before this investigation and resulting conclusion is complete. A more adequate timeframe to conduct this process and notify all relevant customers is 10 business days.	Suggested revision: Where non-conforming products are detected after they have been delivered, the organization shall: a) Immediately cease selling any non-conforming products held in stock; b) Notify its certification body in writing within three (3) business days of the non-conforming product identification, and maintain records of that notice; c) Notify all relevant customers in writing within ten (10) business days of the non-conforming product identification, and maintain records of that notice; d) Analyse causes for occurrence of non-conforming products, and implement measures to prevent their re-occurrence; e) Cooperate with its certification body in order to allow the certification body to confirm that appropriate actions were taken to correct the non-conformity.
1.7.3	G	The added requirements have the potential to become over reaching.	Suggest V2-1 language and consider simplifying by changing to: d) Incidents in which delivery of non-conforming products were detected; followed up and analysed, the certified organization will identify these to the certifying body at the next scheduled audit for appropriate consideration of conformance.

1.7.3	G	RockTenn, with one exception, believes that the change in this clause helps to clarify the handling of non-conforming product. We feel that section d) should be limited to only notifying the CB of corrective action. The way it is currently worded introduces a degree of CB interpretation that may lead to inconsistent application of the standard.	Part d should simply read:  d) Notify its certification body of all corrective actions taken and implemented.
1.7.3	G	In case non conforming products are detected all relevant customers need to be informed within five business days. Five business days is at least better than the previous three, but is it still realistic? I propose 10 business days. This requirement does not say however what the consequence is for all downstream users.	10 business days rather than 3  Phrase an an answer regarding the consequence for any downstream user.
1.7.3	G	Step 1.6.1. dictates that the COC holder develop a corrective action mechanism. Step 1.7.3. appears to indicate that all non-conformances must also be immediately reported to the certification body. There should be a consideration of severity or frequency before the certification body is involved. The use of the word “delivered” impacts this significantly. As an example ... if, as a fabricator, we receive a truck load of composite panels tagged as FSC Mix Credit and the invoice does not reflect the same claim, technically this is a non-conformance. Contacting the supplier to correct and resubmit the invoice would resolve the issue without the need to involve / wait on the certifying body. The same situation could occur if a packing slip were lost in transit off an inbound rail car.	Options: 1. Re-word to indicate “detected after they have been fabricated/sold”  2. Drop the requirement  3. Change the requirement based on a frequency or severity rating  4. Change the requirement to allow for the recipient to quarantine material and work through corrective action measures prior to escalating to CB/FSC.  5. Drop the requirement 1.6.1. as this is a duplicate of this step
1.7.3		Product non-conformance: This language should be clarified such that all relevant business to business customers are notified of any non-conforming product.	Change “all relevant customers” to “all relevant business to business customers.”
1.7.3	T	What is the required action of relevant customers?	Clarify the definition of “relevant customers”.
1.7.3	G	Not applicable for B2C relations. Together with the certifications body appropriate actions should be adjusted.	
1.7.3 (b)	T	Many Organizations have a very complex supply network and for this reason may exceed the deadline proposed. In order to consider this subject a new wording is proposed. Besides that, the Chain of Custody Evaluation (FSC-STD-20-011) may also present an orientation regarding the conditions related to the non-compliance with deadline may be justified.	New wording: (add red text) b) ‘Notify its certification body and all relevant customers in writing within five (5) days the non-conforming product identification, and maintain records of that notice. <b>However, Organizations may present justifications to its CB when deadline is exceeded.</b>
1.7.3 (b)	T	Many Organizations have a very complex supply network and for this reason may exceed the deadline proposed. In order to consider this subject a new wording is proposed. Besides that, the Chain of Custody Evaluation (FSC-STD-20-011) may also present an orientation regarding the conditions related to the non-compliance with deadline may be justified.	New wording: b) ‘Notify its certification body and all relevant customers in writing within five (5) days the non-conforming product identification, and maintain records of that notice. <b>However, Organizations may present justifications to its CB when deadline is exceeded.</b>
1.7.3 (b)	G	We see it very important that the time for notification is lengthened to 5 business days.	
1.7.3 (b)	T	What are “relevant customers”? What if the customers are unknown (certified retailer without record of customers)?	Clarify the term “relevant customers”. Make it a business-to-business requirement.

1.7.3 b) line 1	G	Relevant customer not involved in the non conformity do not necessarily to know the problem. Bad information gave without any reason. All the customer of a company must have the same importance and the access to the same information.	not 'all relevant customers' but 'possibly involved customer' or 'customers at risk'
1.7.3, b)	G	We see it very important that the time for notification is lengthened to 5 days.	
1.7.3, b)	G	We see it very important that the time for notification is lengthened to 5 days.	
1.7.3, b)	G	We see it very important that the time for notification is lengthened to 5 days.	
1.7.3, b)	G	UPM welcomes the prolonged timeframe for notifying a non-conforming product identification.	
1.7.3, b)	G	UPM welcomes the prolonged timeframe for notifying a non-conforming product identification.	
1.7.3, b)	G	UPM welcomes the prolonged timeframe for notifying a non-conforming product identification.	
1.7.3.b	T	Tendency will be to only notify CB if it can't be dealt with in-house	Omit requirement to notify CB in the first instance
1.7.3.b	G	We see it very important that the time for notification is lengthened to 5 days.	
1.7.3.b	T	This regulation is not practical for retailer. Customers often do not remember the purchase of small amounts. Also this can apply for respective products (e.g. pens) to many clients of a retailer.	e) If the situation applies for endusers, the regulation does not apply in b) however, in corporation with the certification body appropriate measures shall be identified and implemented.
1.7.3.b	T	It is not appropriate to set a certain due date for notifying all relevant customers about non-confirming material as mandatory requirement, because there is variety of CoC CHs and some industry sector needs more preparation time for the notification.	Remove specific time frame from the requirement. Each certificate holder should be allowed to set time frame appropriate to their each circumstances. The defined time fame will be evaluated by responsible CB.
1.7.3.d	G	Does not predetermine what the CB should consider appropriate actions. Because it is left to the CB there could be a broad spectrum of interpretations from corrective actions to product recall. We believe it should be limited to notifying the CB and developing an action plan.	
1.7.3:b)	T	Does "in writing" include e-mails and fax?	Please specify in the text.
2.0 scope		2. Scope: Is it envisaged to prescribe a standard text format for scopes ? It could be a problem if different CBS use different approaches on how a company should include sites in their scope (all in one sentence? For single certificates with more than one site: do the other site(s) also have to be named in the scope? Or in the certificate?	
2.1	E	Please note that a company is not obliged to implement a Coc for all of his sites. It's necessary if we want to sell FSC claim but not an obligation if we don't sell any FSC.	
2.1.1	E	The current wording could lead companies to understand that non certified products should be included in its FSC CoC scope	Rephrase 2.1.1 to: "... processing, labelling and physical handling of FSC and Controlled Wood materials and products take place" or alike.
2.1.1		It is unreasonable to include all sites that may conduct the various activities listed. Especially with regard to activities that are handled by outsourced contractors. Including all such sites would drastically broaden the scope of the certificate and required audit visits.	The organization shall include in the scope of its FSC certificate all sites where activities related to purchase, sale, and processing of materials and products take place.

2.1.1	T	2.1.1 – In most cases the certificate only include one site.	Rewrite the text so it address the most common situation with only one site. Then write what happens when there are more sites to consider
2.1.1	T	The term “materials” should be replaced with “eligible inputs” in order to make clear that this indicator is intended to keep the scope to FSC related operation.	The organization shall include in the scope of its FSC certificate all sites where activities related to purchase, sale, storage, processing, labelling, and physical handling of eligible inputs and FSC products take place.
2.1.1	T	The explanation, which sites shall be included in the scope of the certificate is not in line with the definition of the scope of the COC standard (B). Sites which are not involved in any processing or transformation of certified products (e. g. storage, distribution, logistics) are not effected by COC, as long as the control of documents concerning COC declarations does not happen by this sites. Non-sense audits of warehouses should be avoided.	Clarify that sites which are not involved in any processing or transformation of certified products (e. g. storage, distribution, logistics) do not have to be included in the scope of the certificate, as long as control of documents concerning COC declarations does not happen on this sites.
2.1.1	G	Outsource facilities should be excluded from the listing. Often, the list of Outsource contractors that a company may use is very dynamic, in terms of overall use of Outsourcing, as well and the number of Contractors. Including the Outsource Facility in the scope of the certificate would result in endless revisions and edits. “Secondary offices” are often used by Companies as part of their standard structure. Example: home offices for employees. These secondary offices are merely extension of the main office and should not be required to be listed in the scope of the certificate.	Clarify that this does not include Outsource facilities. Clarify that this does not include secondary offices.
2.1.1	T	The requirement should be specific to FSC activities.	Add “FSC” .....all sites where “FSC” activities related to.....
2.1.1.	E	Simplify the language	Change to (remove red text) If the scope <b>organization wants to</b> includes multiple sites the organisation <b>in the scope of the certificate, it</b> shall conform with the requirements specified in FSC-STD-40-003.
2.1.1.	T	There are some products which get purchased by a trading company and sold to a customer without physical possession. In other words, those products get owned by the trading company and enter the CoC of the trading company, but it is not possible to include into the scope of its chain of custody the sites where those products were stored before sales.	To add a NOTE clarifying the case of Trading Companies.
2.1.1.	T	2.1.1 – In most cases the certificate only includes one site.	Rewrite the text so it addresses the most common situation with only one site. Then write what happens when there are more sites to consider
2.1.1.	E	Simplify the language	Change to (remove red text) The organisation shall <b>include in</b> define the scope of its FSC Certificate to include all sites .....
2.1.2	T	Single CoC certification with multiple sites only have to conform with Part I- eligibility.	2.1.2 If the organization wants to include multiple sites in the scope of the certificate, it shall conform with the requirements specified in FSC-STD-40-003. Single CoC certification with multiple

			sites only have to conform with Part I- eligibility
2.1.2	T	Single CoC certification with multiple sites only have to conform with Part I - eligibility.	Suggested Revision: 2.1.2 If the organization wants to include multiple sites in the scope of the certificate, it shall conform with the eligibility requirements specified in FSC-STD-40-003, Part 1.
2.1.2	T	When an organization want to include more sites they have to apply the multisite standard FSC-STD-40-003 !?	Remove 2.1.2 Today you can have one certificate with several sites but without a multisite certificate. This option should not be changed!
2.1.2	T	When an organization want to include more sites they have to apply the multisite standard FSC-STD-40-003 !?	Remove 2.1.2 Today you can have one certificate with several sites but without a multisite certificate. This option should not be changed!
2.2.0	E	The entire section about product groups is strictly related to the percentage and credit system and thus creates unnecessary noise in the standard for companies using the transfer system. This section should be moved down under the section relating to the percentage and credit systems.	Move this section
2.2.0	T	Good. Keep product groups in!	
2.2.0	E	This section should be moved down under the section relating to the percentage and credit systems.	Move this section.
2.2.0	E	"Products groups" should be "Product groups"	"Product groups"
2.2.0	E	Products groups	Product group
2.2.1	T	Point e) is not needed. Supply countries are already listed in company's risk assessment. This only increases bureaucracy	Deletion
2.2.1		"The organization shall establish product groups for the purpose of controlling products that will be sold with FSC claims."  From my point of view, the establishment of product groups within the transfer system only serves statistical purposes. Product groups increase bureaucratic efforts drastically, however do not lead to real conclusions.	Therefore, I am in favor to waive the definition of product groups within the transfer system.
2.2.1	T	Point e) is not needed. Supply countries are already listed in company's risk assessment. This increases paper work and bureaucracy	Deletion
2.2.1	E	Keep previous 2.1.1.	
2.2.1	E	Keep previous 2.1.1.	
2.2.1 e)	T	Point e) is not needed. Supply countries are already listed in company's risk assessment. This only increases bureaucracy	Deletion
2.2.1 e)	T	Point e) is not needed. Supply countries are already listed in company's risk assessment. This only increases bureaucracy	Deletion
2.2.1 e)	T	Point e) is not needed. Supply countries are already listed in company's risk assessment. This only increases bureaucracy	Deletion



2.2.1.-2.2.3.	E	The group of indicators 2.2.1.-2.2.3. seems to be too complex with no reason. All those indicators are speaking about pretty much the same and it is much better to combine them into one solid indicator.	The wording can look as the following: “The organization shall establish and maintain product groups for the purpose of controlling products that will be sold with FSC claims. A list of product groups included in the scope of the certificate has to specify the following: a) The product type(s) according to the FSC Product Classification (FSC-STD-40-004a); b) The control system used for making FSC claims; c) The input materials used and the respective material categories; d) The applicable FSC claim(s) for the outputs (e.g. FSC 100%, FSC Mix 70%); e) The species (including scientific and common name) and country(ies) of harvest of input materials, where the species information designates the product characteristics and/or where required by law. NOTE: Additional requirements apply for the establishment of product groups when using a credit system. They are listed in Part II of this standard.”
2.2.2	E	Keep previous 2.1.2 and 2.1.3.	
2.2.2	E	Keep previous 2.1.2 and 2.1.3.	
2.2.2	T	Detailing product groups more specifically helps with searching on the info database. Allowing CHs to choose the level like this can get confusing. CH data coming from FSC IC shows multiple levels are chosen.	Provide guidance of the appropriate level of product classification
2.2.2	G	Implied to this rule it isn't allowed to mix different materials in one product type category. This disagrees with some product groups like wood ingrain wallpaper or melamine faced chipboards. So b) must be cancelled.	Cancellation
2.2.2	G	This point should be cancelled as it is not necessary.	Cancellation
2.2.2	G	This point should be cancelled as it is not necessary.	Cancellation
2.2.2	T	Please clarify which is the intention of the requirement: a) or b) or c) or a) and b) and c)	
2.2.2	T	“Product groups shall be formed by products that ...” It is not clear enough that this is linked to sales/output products, not raw materials. See also definition of “product group”.	“Product groups shall be formed by OUTPUT products that ...”
2.2.2	G	This point should be cancelled as it is not necessary.	Cancellation
2.2.2	G	This point should be cancelled.	Cancellation

2.2.2	G	<p>2.2.2 Product groups shall be formed by products that:</p> <p>a) Are classified under the same product type category (Level 1, 2 or 3), according to FSC-STD-40-004a;</p> <p>b) Are made of the same type of input or set of inputs;</p> <p>The majority of cartonboard consists of input products from different product type categories. For example pulp, roundwood and recycled fibres.</p> <p>The current wording could be understood to imply that such board products made from different input types would be excluded from certification. Our understanding is that this is not the intention of FSC. To avoid uncertainty and misunderstanding, we therefore suggest to clearly imply that, as before, it will still be possible under the new standard to mix wood products with pulp and paper products into one product output group.</p> <p>Should this not be the case, the majority of cartonboard products available would be excluded from certification.</p>	
2.2.2	G	This point should be cancelled as it is not necessary.	Cancellation
2.2.2.a		<p>2.2.2a is a company free to define products groups on whatever level they want? Most want to keep it as simple as possible and will only stick to level 1. But the result is that a lot of products with different input material will be put in one product group. This will be very non-transparent for the CBs and for the clients. Please look into 5.2.3:</p> <p>What if a company has the product group W16? Then in the product group list, in the annual volume summaries and also in the FSC database is written only W16. It is very non-transparent there is only one summary for 10.000 Matches (W16.6) + 1.000 ladders (W16.9) = 11.000 household articles (W16). So I would prefer if the product group should be defined by the highest Level, that is possible. If a product type is not written in the FSC database, it is not covered by the scope. Here should also be written, that the Level according to 40-004a should be as detailed as possible. Wood charcoal -&gt; Level 1 is o.k.. If a company is selling coated and uncoated printing paper, then P2.1.1 AND P2.1.2 has to be written in the scope and not only P2.1, because this is too non-transparent</p>	
2.2.2.a	T	The exclusive assignment of materials for their product classification in level 1, 2, 3 is not practical. E.g. particle boards with decor paper layer.	Need of clarification
2.2.2.a	T	In FSC-STD-40-004a Product groups for raw particle and fiber boards are missing	Expansion of the FSC-STD-40-004a Product groups for raw particle and fiber boards
2.2.2b)	T	What is "type of input"	Product Type or Quality of input?
2.2.3	G	<p>Why would under e) species be qualified as "where the species information designates the product characteristics"?</p> <p>This disadvantages solid wood as I bet paper or composite companies would not have to qualify groups the same way.</p> <p>This looks like misplaced energy related to accurate description called for by Motion 43 which should be dealt with by being more transparent about what an FSC Mix claim represents (support of responsible forestry.)</p> <p>I would leave the "allowed by law" as solid wood people want to be very sure anyone with an FSC Cherry paper is required to use the term imitation so as not to confuse the real wood species with a fake.</p> <p>We believe there is a chance over time that referencing a wood species name based on "look" rather than "content" maybe seen as greenwash or misleading consumers.</p> <p>Just like food...we need to know what is natural and what is artificial. This is not the place to introduce disadvantage to solid wood</p>	Strike the qualified phrase: "where the species information designates the product characteristics"

		segment. The energy is misplaced.	
2.2.3	G	2.2.3 e), 12.1.1 and 12.2.1 We support the requirement to specify species and country of harvest in accordance with EUTR, as it would be catastrophic for the FSC system, if the CoC standard is incompatible with the EUTR requirements.	
2.2.3	T	Introduce the terms 'basic materials' and 'end product' to avoid 'input' and 'output'. For a sawmill logs are basic material and sawn timber is the end product, but for a window frame factory sawn timber is basic material and the window frame is the end product. (currently the FSC database mentions for several companies the basic material instead of the end product, I think the new coc standard should try to avoid this) For a trader the basic material and end product is the same, but they can still write it down on the product group list. In point c and f the applicable claim is necessary to ensure companies understand that material without the x%, eg FSC Mix, may not be sold further as FSC certified. If this is part of the product group list the auditor can see that this is understood by the company. e) "required by law" might be hard to audit.	The organization shall maintain a list of product groups included in the scope of the certificate, specifying for each product group: a. Description of the end product that is sold with an FSC claim (Product group) b. The product type (NO 's') according to the FSC product classification; c. The material category including the applicable claim of the end product; d. The control system used to determine the FSC claim of the end product; e. The basic materials used to produce the end product; f. The material category and applicable claim of the basic material(s); g. "current e", but suggestion: applicable law of the country in which the CH is based.
2.2.3	E	This point should be cancelled as all requested information are already available on the FSC database.	Cancellation
2.2.3	E	This point should be cancelled as all requested information are already available on the FSC database.	Cancellation
2.2.3	T	Item d) states that all output claims need to be recorded. This could be an endless list of claims for many companies because of a wide variation in percentages (both recycled and mix).	"d) The applicable FSC claim(s)" [added] Material categories "for the outputs"
2.2.3	E	This point should be cancelled as all requested information are already available on the FSC database.	Cancellation

2.2.3	T	<p>Rainforest Alliance strongly feels that the product group schedule is a key requirement and should hold sufficient and accurate information defining a company's scope of their certificate. However, this standard also requires additional detailed requirements for the Annual Volume Summary and the Material Accounting Record. RA would like to ensure that efforts are not unnecessarily repeated. Furthermore, we find some of the current requirements difficult to attain and verify:</p> <p>c) "input materials" is a vague term and can cause inconsistencies in providing this information.  d) Currently the precise claim is not required but rather the material category. The inclusion of a precise claim makes this requirement difficult for transfer system companies which may have variable input claims (e.g. FSC Mix Credit vs FSC Mix 70%), and also for percentage system companies with variable output percentages.  e) Countries of harvest information is not always easily available to downstream operations, even when species remains a relevant characteristic of the product. To meet this requirement, Organizations will therefore rely on supplier or sub-supplier declarations of origin with no means of verifying such declarations of origin. Auditors evaluating the product group schedule will then simply be verifying a declaration, and have no means to evaluate The countries of harvest declaration on the product group schedule. The intent of this requirement therefore loses integrity. Countries of harvest requirements should instead be required within the material accounting record only.</p>	<p>Maintain required elements to be specified per product group, per FSC-STD-40-004 v2-1 2.1.1-2.</p> <p>Alternately, replace the specified subsections as follows:</p> <p>"c) The product type of input and their respective material categories"  "d) The applicable material category(ies) for the outputs (e.g. FSC 100%, FSC Mix)"  "e) The species (including scientific and common name, where the species information designates the product characteristics, and/or where required by law;</p>
2.2.3	G	<p>RockTenn believes that the change in clause 2.1.1 c from:</p> <p>c) species including scientific and common names used as inputs to the product group, if information on species composition is commonly used to designate the product characteristics. to 2.2.3 e)</p> <p>e) The species (including scientific and common name) and country(ies) of harvest of input materials, where the species information designates the product characteristics and/or where required by law.</p> <p>is unreasonable as it applies to secondary producers (recycled mills and converting operations). While it is reasonable to expect a paper mill or other primary producer to have species and country of harvest information it is not feasible to have this information at a secondary producer level. This information simply does not exist for a 100% recycled paper mill.</p>	<p>Edit 2.2.3 e to reflect the below language.</p> <p>e) The species (including scientific and common name) and country(ies) of harvest of input materials, where the species information is commonly used to designates the product characteristics or where required by law.</p>
2.2.3	E	This point should be cancelled as all requested information are already available on the FSC database.	Cancellation
2.2.3	T	In many cases building of product groups is not helpful, because COC is used by article or jobs/orders.	"The organization shall maintain a list of PRODUCTS OR product groups, IF APPLICABLE, ..."
2.2.3	E	This point should be cancelled as all requested information are already available on the FSC database.	Cancellation
2.2.3	E	This point should be cancelled as all requested information are already available on the FSC database.	Cancellation
2.2.3	G	This point should be cancelled as all requested information are already available on the FSC database.	Cancellation
2.2.3 e	E	Ask group product by species for pulpand paper industry for example is not possible !! because in some country we could have a mix of 12 forest species in a same group (Hardwood). It's not acceptable to define a group for oak, chestnut, beech, etc ...	Remove species for criteria of group product.

2.2.3 e	T	“The species (including scientific and common name) and country(ies) of harvest of input materials, where the species information designates the product characteristics and/or where required by law.” I understand that EUTR requires this and FSC has to align with EUTR, but sometimes and in some parts of the world, companies that are further down the chain (e.g. they are not the direct importers) do not know what country the product comes from – and this language will require them to make something up	“e) The species (including scientific and common name) of input materials where the species information designates the product characteristics  f) The country(ies) of harvest where known and/or required by law.”
2.2.3 e	T	This is the responsibility of the supplier to keep	On simple request to the supplier the organisation shall receive the species....
2.2.3 e)	T	Information requirements by law concern any products and product groups, not just FSC product groups. It is unnecessary to duplicate that kind of requirements here.	Deletion of “and/or where required by law.”
2.2.3 e)	T	Information requirements by law concern any products and product groups, not just FSC product groups. It is unnecessary to duplicate that kind of requirements here.	Deletion of “and/or where required by law.”
2.2.3 e)	T	Information requirements by law concern any products and product groups, not just FSC product groups. It is unnecessary to duplicate that kind of requirements here.	Deletion of “and/or where required by law.”
2.2.3 e)	T	This bullet point needs to be divided into two sections as it addresses two very different subjects regarding the actual product characteristics and also the origin of supply.  It would be helpful to have a note to state current EUTR requirements, e.g. that Operators must maintain this information (through a due diligence system) but traders are not required to (only to keep records of supplier and customers).	e) The species (Inc..) and country(ies) of harvest of input materials, where the species information designates the product characteristics. f) The species (inc..) and country(ies) of harvest of input materials where required by law.
2.2.3 e)		e) does “required by law” only refer to the country where it is produced? What if a product is exported to Europe?	
2.2.3 e)	G	Clarify this requirement, especially in regards to “and/ or required by law”. While this may be a EUTR requirement, for companies that are removed from the log stage of the business, it can be difficult/ impossible to state the country of harvest (e.g., pine MDF moulding – the original fibre could be from anywhere almost).	
2.2.3 e)	E	There are efficient ways of CH demonstrate input material’s species and countries of harvest, other than stating this on product list or material accounting record.	Delete.
2.2.3 e), 12.1.1 and 12.2.1	G	Support the requirement to specify species and country of harvest in accordance with EUTR.	-
2.2.3, 5.1.1, 12.2.1	G	2.2.3, 5.1.1, 12.2.1 There appear to be varying perspectives on how species and country of harvest should be addressed in the FSC Chain of Custody system, and the inclusion of a country of harvest requirement in 2.2.3, 5.1.1, and 12.2.1. 5.1.1.g creates a new requirement for certificate holders to record the species name and country of harvest when the “species information designates the product characteristics and/or where required by law.” This seems to create some confusion around what certificate holders are required to maintain these lists, how and when this information is recorded, and what is required for a material accounting record. The intention of the requirement for a material accounting record is clear in the existing standard (V2.1), but the intention is not as clear in the draft language (V3). It is difficult to determine from the draft language whether this would be an actual record, a method to ensure that material output corresponds with input, or a combination of records and documents which the company maintains and provides to their customers if	Discuss the application of timber legality legislation with the COC working group.

		<p>requested. If this requirement does apply to incoming documentation, it is unclear if the receiving company would be in conformance if deliveries did not have this accompanying information. The draft 3.2.1 requirement states, "The organization shall have a system in place to confirm that the quantities and FSC claims of the materials received as input for FSC product groups are accurately documented in the purchase and transport documentation from the supplier." Therefore, this may make it extremely difficult for companies to comply.</p> <p>It also seems as though species lists are appropriately referenced in 2.2.3e (product group list) and 12.2.1 (Timber Legality Compliance), and it would be helpful to have clarification around how this information is to be managed in a material accounting record, or if this information should only be available upon request. Additionally, some have expressed that as it is already referenced as a requirement in 2.2.3 and 12.2.1, it is unclear why it is also included in 5.1.1.</p> <p>As FSC Chain of Custody is a global standard it seems as though it should strive to address all timber legality legislation and that it should be included in the standard in the appropriate sections and clarified to clear up the confusion stated above. However, there are also some concerns that by only requiring the species and country of harvest information for some certificate holders, it may be very difficult for organizations further down the supply chain to be able to obtain this information if it's not required for all. Therefore, it may be better to always require this information. However, on the other side there are also concerns about the overall feasibility of this requirement for certificate holders. It may be fairly burdensome for certificate holders to identify country(ies) of harvest input. Lastly, there are concerns about the specific requirements to include invoice numbers as it appears to create even more work where it may not be necessary. The previous clause states invoice references that allows for more flexibility for conformance to the requirement, and does not mandate a specific element for the material accounting record.</p>	
2.2.3.c	T	In the product group list the input materials shall be specified. There is a definition of input given, but what is the definition of input materials? There are two options: delete or define input materials.	Delete: input materials used and the c. The <b>input materials used and the</b> respective material categories
2.2.3.d		2.2.3d: applicable claim for percentage control system can vary from job order to job order or from day to day. It is not possible to include all potential output claims with exact percentage into one fixed scope.	
2.2.3.e	T	The wording "where the species information designates the product characteristics" can be interpreted in different ways (does it relate to visible product properties as for a solid wood furniture or also to invisible product properties as for paper where the species composition also has an influence on the product properties?)	A note including practical examples should be included in the requirement!
2.2.3.e	E	There are efficient ways of CH demonstrate input material's species and countries of harvest, other than stating this on product list or material accounting record.	
2.2.3.e	E	There are efficient ways of CH demonstrate input material's species and countries of harvest, other than stating this on product list or material accounting record.	
2.2.3.e	T	Country(ies) of harvest information doesn't designates the product characteristics. Also, in a lot of cases, it is not required by law. For example; in the EU this information (and the scientific/trade name) is only required when offering the product on the internal market for the first time.	Change: The species (including scientific and common name) of input materials, where the species information designates the product characteristics and/or <b>country(ies) of harvest of input materials</b> where required by law.

2.2.3.e		2.2.3e what is exactly meant by “required by law”? EUTR for example requires only that information on country of harvest or species are summarily available but not for specific products. Which law is relevant? The law of the country where the company is located? Or the law of the country(ies) where products are exported to? What happens if a multi site has a site in one country where law does not require country+species while another site is located in another country where law requires this?	
2.2.3e & 5.1.1g	T	Comments by Jason Grant – I agree	Suggestions by Jason Grant – I agree
3.0 Material sourcing	T	<p>There is an interpretation that requires to either assign input material that comes with an FSC and an PEFC claim to either the FSC or the the PEFC volume accounting. As third alternative a joint FSC-PEFC account can be used.</p> <p>We think that the interpretation should be eliminated. A claim of another forest certification scheme has nothing to do with the status that the material is also FSC-certified. Also in terms of volume accounting the FSC status is a specific property of the material. Forest owners have invested into their FSC certificate even though they also hold the certificate of another forest certification scheme. The only problematic issue if a company wants to make claims about the proportion or purchase of “certified material” and defines “certified” as being FSC and PEFC. In this case double certified material should only be counted on time.</p> <p>We don’t find any stipulation that corresponds to the interpretation. This is good!</p> <p>We recommend clarifying this issue in the section 3 Material sourcing.</p>	<p>Add a note below 3.2.2:</p> <p>Note: In the case that the organization sources material that is delivered with an FSC claim and a claim from another forest certification scheme (“double certified material”) the volume can be used for percentage and credit accounting in FSC product groups independently from the use of the claim of the other forest certification system. Only if the organization wants to make general claims about their sourcing, such as on the proportion of “certified material” such double certified volumes need to be counted only on time.</p>
3.0 Material sourcing	T	Somewhere the Advice note 40-005-11 should be incorporated which says that where buying already CW material, only particular requirements of 40-005 apply	Consider incorporating Advice? (even though it’s about 40-005, it is relevant for general COC for those companies buying CW material)
3.1.1	G	In order to control the suppliers within the chain of custody, FSC could offer a one-way interface organizations can send certificate numbers of their suppliers to and receive in return validity dates of the specific certificate.	
3.1.1	T	The requirement do not include the supplier certificate validity’s conference by the CH, and this a essential information	3.1.1 The organization shall have and maintain up-to-date records of all suppliers who are supplying material used for FSC product groups, including: a) The suppliers’ name(s); b) The suppliers’ FSC certification code(s) and validity, if applicable; c) The supplied product types, according to FSC-STD-40-004a; d) The supplied material categories.
3.1.1		Supplied product types should not be required to use the identical wording used in FSC-STD-40-004a. Flexibility should be allowed in product type names and correlation to FSC-STD-40-004a should be allowed.	For item c), replace “according” with “as correlated”.
3.1.1	G	Up-to-date should be replaced by regularly	
3.1.1	G	c) The supplied product types, according to FSC-STD-40-004a; the new requirement is not practicable, because the product type according to FSC-STD-40-004a is not used or practicable within the supply chain. Often the markets partners have to create more detailed materials to specify their quality demands.	

3.1.1/3.1.2	G	In order to control the suppliers within the chain of custody, FSC could offer a one-way interface organizations can send certificate numbers of their suppliers to and receive in return validity dates of the specific certificate.	
3.1.1/3.1.2	G	In order to control the suppliers within the chain of custody, FSC could offer a one-way interface organizations can send certificate numbers of their suppliers to and receive in return validity dates of the specific certificate.	
3.1.1/3.1.2	G	In order to control the suppliers within the chain of custody, FSC could offer a one-way interface organizations can send certificate numbers of their suppliers to and receive in return validity dates of the specific certificate.	
3.1.2	T	The FSC Marketplace is also designed so that it is automatically linked to FSC database. Therefore checking with FSC Marketplace should also be allowed.	
3.1.2	E, T	(T) In order to solve “Originating Error 2: claims with errors” (Transaction Verification webinar slides) the standard should define a period for checking certificate’s validity and scope.	(E) Delete “FSC Online Claims Platform at ocp.fsc.org” from the sentence.
3.1.2	G/T	FSC OCP is an octopus for data that can’t be supported. Leave the V2-1 Text	3.1.2 The organization shall verify the validity and scope of the supplier’s FSC certificate for any changes that might affect the availability and authenticity of the supplied products via <a href="http://info.fsc.org">http://info.fsc.org</a> .
3.1.2	E, T	(T) In order to solve “Originating Error 2: claims with errors” (Transaction Verification webinar slides) the standard should define a period for checking certificate’s validity and scope.	(E) Delete “FSC Online Claims Platform at ocp.fsc.org” from the sentence.
3.1.2	E	Simplify the language	Change to (remove red text) The organization shall verify the validity and scope of the supplier’s FSC certificate <b>for any changes that might affect the availability and authenticity of the supplied products. This shall be done either through the FSC database</b> at <a href="http://info.fsc.org">info.fsc.org</a> or the FSC Online Claims Platform at <a href="http://ocp.fsc.org">ocp.fsc.org</a> .
3.1.2		3.1.2 It should be added, that the control should be documented by print out of the FSC database. Some clients are documenting the supplier control by a sheet of paper on which is written “All suppliers are controlled on 4th March 2014. There is no possibility to vary this.	
3.1.2	G	As the questions and criticisms about the OCP are not cleared yet, the OCP should not find mention in the new standard.	Delete the OCP
3.1.2	T	We often receive the question: How often must CH verify suppliers FSC certificate, this is very unclear in the current standard and draft to the new standard.	Include criteria for how often the verification must take place for instance through a matrix where a combination of number of total number of FSC suppliers and number of purchases from each supplier results in a verification number
3.1.2	T	Provide clarification as to whether ‘certificate status watch’ in the Trademark Portal is acceptable to use to demonstrate meeting the requirements re checking suppliers’ certificates. If it is deemed suitable a date stamp will need to be added to the feature so that at the very least CHs can collect screenshots to prove that they have regularly checked the information.	Add reference to certificate status watch
3.1.2	G/T	FSC OCP is an octopus for data that can’t be supported. Leave the V2-1 Text	3.1.2 The organization shall verify the validity and scope of the supplier’s FSC certificate for any changes that might affect the availability and authenticity of the supplied products via <a href="http://info.fsc.org">http://info.fsc.org</a> .



3.1.2	G	The OCP will not have the information of all CH, because is optional, thus, should not be recommended as the basis of reference, it can lead to confusion and compromise the traceability that needs to be ensured in the purchase of certified inputs. The FSC Info should be the only reference for the conferences of scope, product groups and other relevant information about the supplier	Remove OCP as a reference. The FSC info should be kept as the main reference to the appropriate certificate validity conference and scope of CH.
3.1.2	E	It's impossible to check on info.fsc.org at each deliveries if supplier is compliance for group product. My employee could spend a lot of time to do it.	Prefer wording : organization should develop a process to check at regular period if their supplier are compliance into info.fsc.org.
3.1.2	E	Eliminate extra wording that does not add value or help clarify the requirement	Delete "for any changes that might affect the availability and authenticity of the supplied products. This shall be done either through."
3.1.2	G	Write how often the organization should verify the supplier's FSC certificate. We had many discussions of this issue and our certification body told us that it is a general issue for companies.	...verify the validity and scope of the supplier's FSC certificate <b>minimum on a yearly frequency</b> for any changes...
3.1.2	T	It's not clear how often the organization is responsible for verifying the validity and scope of the supplier's FSC certificate.	Clarify the minimum interval between checks of supplier's certificate scope and validity.
3.1.2	G/T	FSC OCP is an octopus for data that can't be supported. Leave the V2-1 Text	3.1.2 The organization shall verify the validity and scope of the supplier's FSC certificate for any changes that might affect the availability and authenticity of the supplied products via <a href="http://info.fsc.org">http://info.fsc.org</a> .
3.1.2		In group certification scheme, members is not in the data base FSC. The exception should be explicit that this no applies to the member of groups in especial to Forest Management (FM certificates). Also Some members go in to the group after CBs made the audit and they no mention in the anual report. Also, some cbs no have update the report in the internet	The organization shall verify the validity and scope of the supplier's FSC certificate for any changes that might affect the availability and authenticity of the supplied products. This shall be done either through the FSC database at info.fsc.org or the FSC Online Claims Platform at ocp.fsc.org.  <b>In case of suppliers members of Group Certification scheme, the organization representing of the members, can check status of certification with a certificate internal or document official of this organization</b>
3.1.2	T	It is not possible for every purchase to check the validity of the certificate of the supplier	Must be removed.
3.1.2	T	FSC's IT systems may grow and evolve during the period of validity for this standard. Suggest leaving some room for new systems which may be developed in the future.	Append ", or through other online tools provided by FSC and specifically designated for this purpose."
3.1.2	G	Directing organizations to verify the status of certificates in two different sources can lend confusion.	Remove the reference to the voluntary Online Claims Platform and direct all verification of certificates to the FSC Database.
3.1.2	G/T	FSC OCP is an octopus for data that can't be supported. Leave the V2-1 Text	3.1.2 The organization shall verify the validity and scope of the supplier's FSC certificate for any changes that might affect the availability and authenticity of the supplied products via <a href="http://info.fsc.org">http://info.fsc.org</a> .

3.1.2	T	The manual check via info.fsc.org might be too complicated and might be done not often enough. The check via OCP implies liabilities which are not accepted by many companies.	FSC should provide a technical solution to inform about changes of certificate data (suppliers, clients, competitors), without necessary agreement by the certificate holders and without a necessary client-supplier-relationship, in form of an email subscription with real-time announcements of changes.
3.1.2	G	FSC OCP remains disproportionate and fraught with many risks for participating companies. Hence OCP can't be supported.	Delete the OCP from all parts of the CoC standard: The organization shall verify the validity and scope of the supplier's FSC certificate for any changes that might affect the availability and authenticity of the supplied products via <a href="http://info.fsc.org">http://info.fsc.org</a> .
3.1.2	E	The organization is required to verify validity of the supplier's certificate, but the supplier has no stated responsibility to inform customers that their certificate is invalid.	Add requirement for a certificate holder to notify customers when their certificate becomes invalid. ( This would also partially addressed to issue raised by 3.4.1)
3.1.2	G/T	FSC OCP is an octopus for data that can't be supported.  Leave the V2-1 Text	3.1.2 The organization shall verify the validity and scope of the supplier's FSC certificate for any changes that might affect the availability and authenticity of the supplied products via <a href="http://info.fsc.org">http://info.fsc.org</a> .
3.1.2	G/T	FSC OCP is an octopus for data that can't be supported.  Leave the V2-1 Text	3.1.2 The organization shall verify the validity and scope of the supplier's FSC certificate for any changes that might affect the availability and authenticity of the supplied products via <a href="http://info.fsc.org">http://info.fsc.org</a> .
3.1.2	G/T	FSC OCP is an octopus for data that can't be supported.  Leave the V2-1 Text	3.1.2 The organization shall verify the validity and scope of the supplier's FSC certificate for any changes that might affect the availability and authenticity of the supplied products via <a href="http://info.fsc.org">http://info.fsc.org</a> .
3.1.2	G	The FSC database in a complete collection of all certificate holders and a practicable way to manage the relevant data. The OCP as it exists in the moment is still on experimental stage and everybody knows about the pending points. So it does not make sense to refer to it. In order to control the suppliers within the chain of custody, FSC could offer a one-way interface organizations can send certificate numbers of their suppliers to and receive in return validity dates of the specific certificate.	Delete the OCP- reference
3.1.2	E,T	(T) In order to solve "Originating Error 2: claims with errors" (Transaction Verification webinar slides) the standard should define a period for checking certificate's validity and scope.	(E) Delete "FSC Online Claims Platform at <a href="http://ocp.fsc.org">ocp.fsc.org</a> " from the sentence.
3.1.2	T	FSC shall provide a web service to ERP Systems (for example SAP) to approve the validity and scope of certificate of requested suppliers automatically. Proposal: In order to control the suppliers within the chain of custody, FSC could offer a one-way interface organizations can send certificate numbers of their suppliers to and receive in return validity dates of the specific certificate.	

3.1.2 6.1.3 11.1.2	G	<p>The OCP was born to grant a necessary transparency on COC processes, once there are not public summaries available; however there are doubts on how FSC would grant visibility for information without let them lose their confidentiality. That is why the OCP platform is so problematic, because it has lost the reason of its creation.</p> <p>Furthermore, OCP is vulnerable in security terms, due to the volume of data which is kept in only one tool and to the extremely confidential content, intended by market agents.</p> <p>For this reason, this tool became voluntary by FSC and has allowed some suppliers choose it, but also others choose the INFO. This way, consumers will have to verify two references, and could even compromise the understanding of claims, driving to contradictions, for example.</p>	Based on the comment presented, the existing INFO website should have more robustness instead of creating a new tool that was not accepted by FSC stakeholders.
3.1.2 6.1.3 11.1.2	G	<p>The OCP was born to grant a necessary transparency on COC processes, once there are not public summaries available; however there are doubts on how FSC would grant visibility for information without let them lose their confidentiality. That is why the OCP platform is so problematic, because it has lost the reason of its creation.</p> <p>Furthermore, OCP is vulnerable in security terms, due to the volume of data which is kept in only one tool and to the extremely confidential content, intended by market agents.</p> <p>For this reason, this tool became voluntary by FSC and has allowed some suppliers choose it, but also others choose the INFO. This way, consumers will have to verify two references, and could even compromise the understanding of claims, driving to contradictions, for example.</p>	Based on the comment presented, the existing INFO website should have more robustness instead of creating a new tool that was not accepted by FSC stakeholders.
3.1.2 & 11.1.2	E	... either through ...	... through either ... is better English
3.2.0	T	This entire section is very confusing. It jumps back and forward between normative clauses and N. Clause 3.2.4 needs to be completely re-written as, at the moment it is neither a normative requirement, nor a Note but a rather messy combination of the two	Clause 3.2.4 – suggested wording “For FSC Mix assembled products, where the species of the visible wood component forms part of the product description, the component shall be FSC certified”
3.2.0	G	(Glossary –Eligible Input). This is a classic example of attempting to describe something in too much detail whereby the end result is that it is either misunderstood or ignored, since it is almost meaningless.	This should reworded to make it as simple as possible.
3.2.1	T	<p>This is not the job of the CH! This is the job of the auditor. If I audit a company, I declare that I think the risk is low that the company makes a wrong invoice. What I need is a CB database to share my findings with other CB's (upload documents in a salesforce kind of database under the licence code)</p> <p>NOTE: the CB database should be implemented together with the simplification and standardization of the audit report, as agreed upon during the GA.</p>	<p>In the Policy of Association should be mentioned: All relevant documents may be shared with other CB's for the integrity of the system.</p> <p>This system will work if the non-conforming products are changed as above and if requirements for invoices are added as written below (see picture in comment form)</p>
3.2.1	T	3.2.1 / 6.1.2 The requirement of controlling CoC-code on purchase and delivery documents has been removed with no explanation even though 6.1.1 and 6.1.2 specifies that companies must put this information on sales and under some conditions also on delivery documents....	Please explain the reason for this change in second draft that goes in public consultation for 3.2.1 and perhaps add “CoC-code is exempted from this requirement” to 6.1.2
3.2.1	T	Does not include the need to verify the certification code in the supplier's document, as it can cause confusion in an invoice that a non-certificate supplier have copied the description of a product that has FSC statement or CW code.	3.2.1 The organization shall have a system in place to confirm that the quantities and FSC claims of the materials received as input for FSC product groups are accurately documented in the purchase and transport documentation from the supplier, <b>including its FSC CoC</b>

			certificate code.
3.2.1	E	We support this very important concept as written.	
3.2.1	T	Changes within this requirement no longer require certificate holders to verify supplier CoC code on incoming documentation. RA feels that this is an important step in confirming input specifications as FSC certified.	Suggested Revision: 3.2.1 The organization shall have a system in place to confirm that the quantities and FSC claims of the materials received as input for FSC product groups are accurately documented in the purchase and transport documentation from the supplier, including its FSC CoC certificate code.
3.2.1 primarily – also 6.1.1 and 6.1.2	G	Loggers and wood suppliers required to have certification in North America usually do not have invoice documents or their own shipping documents. Shipping documents are not required in many areas within the US for wood fiber. Generally, documentation is managed by the certified receiving mill. Wording exceptions should be provided for situations where invoices and shipping documents are supplied by the buyer in a mutually agreed-upon transparent and accurate system accepted by both parties.	Change 3.2.1 to remove the words “from the supplier” as follows: “...accurately documented in purchase and transport documentation.” This slight change would reflect reality in North America, and would not cause a need to modify 6.1.1 or 6.1.2.
3.2.2	T	3.2.2 table B As it is written here, this table seems to forbid what is later described in 3.3. as possible.	On the note there should be a sentence referring that controlled material is allowed, if in accordance with 3.3, in order not to induce confusion.
3.2.2	G	Classification and Control of Input Materials: AF&PA supports the recommendation that “pre-consumer” reclaimed paper count as eligible input material for FSC Recycled and FSC Mix claims. “Pre-consumer” fibre should be valued equally as “post-consumer” fibre since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance.	
3.2.2	T	3.2.2 table B As it is written here, this table seems to forbid what is later described in 3.3. as possible.	Here there should be a sentence referring that controlled material is allowed, if in accordance with 3.3, in order not to induce confusion.
3.2.2	T	3.2.2 table B As it is written here, this table seems to forbid what is later described in 3.3. as possible.	On the note there should be a sentence referring that controlled material is allowed, if in accordance with 3.3, in order not to induce confusion.
3.2.2	E	Page 15 – Table B (and all other tables) Table is informative and not a normative requirement.	Move table to an appendix/annex
3.2.2	E	Table B: the output FSC claims are actually material categories	Replace: FSC claim into material category
3.2.2	T	3.2.2 table B As it is written here, this table seems to forbid what is later described in 3.3. as possible.	On the note there should be a sentence referring that controlled material is allowed, if in accordance with 3.3, in order not to induce confusion.
3.2.2	G	We support the inclusion of pre-consumer recycled material as an eligible input for FSC product groups.	No change required.

3.2.2		I support the recommendation that “pre-consumer” reclaimed paper count as eligible input material for FSC Recycled and FSC Mix claims. “Pre-consumer” fibre should be valued equally as “post-consumer” fibre since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance.	
3.2.2	T	“controlled material” is missing as input in the table.	Add “controlled material” as input, so material which is not delivered as FSC CW but controlled with the own verification programme.
3.2.2		Classification and Control of Input Materials: GPI supports the recommendation that “pre-consumer” reclaimed paper count as eligible input material for FSC Recycled and FSC Mix claims. “Pre-consumer” fibre should be valued equally as “post-consumer” fibre since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance.	
3.2.2	T	<p>As provided in FSC-ADV-50-003 V1-0 of January 19, 2012, products from communities and small producers can be labeled in a specific way.</p> <p>Note that this ADV was created in the context of implementation of the Motion 19, adopted at the General Assembly of 2008, which today remains current because the new FSC Strategic Plan has clear objectives and goals of "creating social value" for Community and smallholders certification through the forest area increased mainly in certified natural forests in the tropics. (see GLOBAL PRIORITY 01 Objective 1.1, indicator 1.1.1).</p> <p>Below the Motion 19:  “FSC shall develop a strategy to differentiate community forest products* from other products, that allows a phrase like “COMMUNITY ORIGIN PRODUCT”, in the claim on the FSC product. The strategy shall include all relevant aspects of Chain of custody and labeling to guarantee product traceability.”</p> <p>In this context, to guarantee traceability and the access to markets for products from communities and small farmers , we recommend that FSC set up an FSC SPECIFIC STATEMENT FOR THESE PRODUCTS, such as:  - FSC 100% Community or FSC 100% Small Producers  - FSC Mix 70% Community or FSC Mix 70% Small producers  - FSC Controlled Wood Community or FSC Controlled Wood Small Producers</p> <p>Thus, it becomes possible to distinguish into the fsc.info products with this claim, ALLOWING a differentiated strategy of market access for these products. For now, because of the lack of an specific FSC Claim is not possible to identify and distinguish products from Community and Small Producers, and this is a weakness in the COC of this products.</p> <p>We believe incorporating this issue in this new version of the standard, will strengthen the solution of "creating social, environmental and economic value " to the certification, as expressed in the draft FSC Strategic Plan. This will increase the Community Forest Management in Brazil</p>	<p>Include in Table B the followed FSC Claim for community and small producers products :</p> <ul style="list-style-type: none"> <li>- FSC 100% Community or FSC 100% Small Producers</li> <li>- FSC Mix 70% Community or FSC Mix 70% Small producers</li> <li>- FSC Controlled Wood Community or FSC Controlled Wood Small Producers</li> </ul>
3.2.2 and 3.2.3	G	3.2.2 Table B and 3.2.3 All forest-based components of an FSC certified product shall be sourced as FSC certified, reclaimed or FSC Controlled Wood. Components	Add note to allow input concerning other material according to FSC Controlled wood standard to avoid exclusion of several products (e.g. Products from certified forest other than FSC) and in the end exclude

			several products from certification
3.2.2 table B	T	As it is written here, this table seems to forbid what is later described in 3.3. as possible.	On the note there should be a sentence referring that controlled material is allowed, if in accordance with 3.3, in order not to induce confusion.
3.2.2 Table B	T	If it is definitively decided that eligible pre-consumer reclaimed material refers to paper and not timber, then the clearer this is, the better (especially when notes to stakeholders are removed from the final STD).	Where pre-consumer reclaimed is referred to, consider using the whole phrase pre-consumer reclaimed (paper)
3.2.2 table B	T	As it is written here, this table seems to forbid what is later described in 3.3. as possible.	On the note there should be a sentence referring that controlled material is allowed, if in accordance with 3.3, in order not to induce confusion.
3.2.2. Table B		Is table B correct? Should there be a differentiation if the Recycled logo is on paper or on wood? Preconsumer wood is not eligible to be used on Recycled wood.....	
3.2.3		<p>REQUEST FOR URGENT AUTHORIZATION OF “MINOR COMPONENTS” IN COLMATED CORKS</p> <p>With the elimination of the exemption of the minor components (FSC-ADVICE-40-004-09) to the requirements for Chain of Custody control, according to the requirements of FSC-STD-40-004 V2-1, the Amorim colmated cork stoppers became categorized as Mix 99% instead of previous 100%.</p> <p>From our point of view, this change will have a very significant negative impact in the commercialization of certified colmated cork stoppers. This is due to the fact that our customer’s won’t value a Mix 99% stopper the same way as they would a 100%. More and more, and because Amorim decided (since 2006) to have in its portfolio only 100% certified products (as it’s the case for natural cork stoppers), it becomes incongruent from a commercial point of view.</p> <p>Considering that:</p> <ul style="list-style-type: none"> <li>- the industrial process of obtaining cork dust from FSC –100% cork stoppers is, from the technical point of view, practically unfeasible due to the material and process characteristics;</li> <li>- FSC cork dust products are not available in the market for FSC-certified cork products; this pathway cannot be considered as a source of obtaining it;</li> <li>- the elimination of the possibility of the use of minor components was implemented, principally, in order to comply with timber legality legislations, such as the EU Timber Regulation (EUTR), US Lacey Act and FLEGT, bearing in mind the illegal logging and associated trade, a phenomenon from which the cork industry is completely isolated;</li> <li>- the proportion of cork powder in colmated cork stoppers is less than 1% (w/w), as result from attached study, and as a consequence, the Mix categorization or the disclaim “This product contains 1% of minor components” is unfeasible both from a practical, material and technical point of view, which results in an impossibility of practical implementation;</li> <li>- the cork powder used in the production of colmated cork stoppers is originated in the stopper’s own production (pre-consumer reclaimed material) and the raw material derives from legal or FSC certificated origins; more, being the raw material cork (which is not wood), in any case its origin can be illegal logging.</li> </ul>	<p>We do request yours best analysis and comprehension for this subject and the derogation of this rule for the cork industry.</p> <p>Cork dust should be excluded since ...</p>

3.2.3	T	<p>REQUEST FOR URGENT AUTHORIZATION OF “MINOR COMPONENTS” IN COLMATED CORKS</p> <p>With the elimination of the exemption of the minor components (FSC-ADVICE-40-004-09) to the requirements for Chain of Custody control, according to the requirements of FSC-STD-40-004 V2-1, the colmated cork stoppers became categorized as Mix 99% instead of previous 100%.</p> <p>From our point of view, this change will have a very significant negative impact in the commercialization of certified colmated cork stoppers. This is due to the fact that our customer’s won’t value a Mix 99% stopper the same way as they would a 100%.</p> <p>Considering that:</p> <ul style="list-style-type: none"> <li>- the industrial process of obtaining cork dust from FSC –100% cork stoppers is, from the technical point of view, practically unfeasible due to the material and process characteristics;</li> <li>- FSC cork dust products are not available in the market for FSC-certified cork products; this pathway cannot be considered as a source of obtaining it;</li> <li>- the elimination of the possibility of the use of minor components was implemented, principally, in order to comply with timber legality legislations, such as the EU Timber Regulation (EUTR), US Lacey Act and FLEGT, bearing in mind the illegal logging and associated trade, a phenomenon from which the cork industry is completely isolated;</li> <li>- the proportion of cork powder in colmated cork stoppers is less than 1% (w/w), as result from attached study, and as a consequence, the Mix categorization or the disclaim “This product contains 1% of minor components” is unfeasible both from a practical, material and technical point of view, which results in an impossibility of practical implementation;</li> <li>- the cork powder used in the production of colmated cork stoppers is originated in the stopper’s own production (pre-consumer reclaimed material) and the raw material derives from legal or FSC certificated origins; more, being the raw material cork (which is not wood), in any case its origin can be illegal logging.</li> </ul>	<p>We do request yours best analysis and comprehension for this subject and the derogation of this rule for the cork industry.</p> <p>Cork dust should be excluded since ...</p>
3.2.3		3.2.3 is release paper for adhesive stickers part of product or not??	
3.2.3	E	<p>3.2.3 Note</p> <p>It should be specified that in case only the packaging or the content is certified a, this need to be clearly specified.</p>	
3.2.3	G	The original advice note provided very clear guidance on what components of a product needed to be certified for the product to carry an FSC claim. However, the revision of the advice note into a clause does not adequately capture the original intent.	Provide better clarification on this clause by including the table of examples from the advice note here either in the standard or as an annex.
3.2.3	G	If i understand this requirement, all the content of an FSC product is certified FSC. For example, if i purchase an FSC on stumpage in a FMU, does the 50% of water content in the cubic meter is certify ? does it the same for Cellulose and lignin ?	
3.2.3		For clarifications sake, does this include any items which are ‘bound’ to the finished product? This would include paper based covers which are added to a proposal document or a presentation.	
3.2.3	T	“All forest-based components ...” includes resins, gum, chemical extracts from fruits, seeds, any plants, fungi as well as components based on wood like activated carbon etc. So each component of a product has to be analysed according to potential ingredients that origin in forests. This is not realistic. Auditors have to be trained to become analytical chemists? Does FSC have reliable proof that the use of these components has negative impact on forests? Does it significantly influence forest management?	Change to “WOOD-based components” as long as the change is not justified and the market effect is not analysed.
3.2.3	E	If we use word “sourced” probably also controlled material should be added to the possible input categories.	We suggest to change wording and add “controlled material”.
3.2.3 Note	E	Make it clear what is actually certified e.g., whether it is the packaging or the content is certified or both.	Add text requiring the specification what content of the product and/or

			packaging is FSC certified.
3.2.3 Note	E	We propose that this entire note be deleted as it quite unclear and likely to cause confusion as it is currently written. It should be self-evident that an organization can certify the packaging or the product contained within made from forest-based inputs or both.	
3.2.4	G	I do not see the need to introduce this requirement! What is the advantage of it? It will lead to less availability of certified furnitures, since in practice in many cases the veneers are FSC Controlled Wood, especially with regard to exotic species. In my understanding this does not lead to an improvement related to misinterpretations, since it only relates to a very small part of the product. Furthermore: The expression "gives its name to the product" will be difficult to audit. What is "the name of the product"? The wording used in the official product description (e.g. in catalogues)? Or is a cabinet with a cherry veneer finishing automatically a "cherry cabinet"?	The requirement should be deleted! If it cannot be deleted, than the wording with regard to the product name should be clarified!
3.2.4	G	The concept that visible / name giving parts of a product should be certified, is appropriate. But currently, a change to this concept is not feasible, because the needed FSC quantities with the necessary quality (for packages, veneers, etc.) are not available in the market. First of all an advancement of certified forest areas needs to be done in order to ensure the availability of primary wood types (e.g. oak, beech). Afterwards the concept should be integrated step-by-step in the Standards and, dependent on the change of certified wood areas, it should also be a part of the next revision process in the year 2020 again.	
3.2.4	G	If implemented, it will hamper the overall supply of FSC certified material in the supply chain.	
3.2.4	G/T	It is not acceptable to have the following paragraph in this or in other FSCstandards: 3.2.4 1.This is in contradiction to the inherent basics of FSC goals that is presented at landing page of <a href="https://ic.fsc.org/">https://ic.fsc.org/</a> : Promoting the responsible management of forests worldwide: Environmentally Appropriate; Protecting and maintaining natural communities and high conservation value forests. Socially Beneficial; Respecting the rights of workers, communities and indigenous peoples. Economically Viable;Building markets, adding best value, and creating equitable access to benefits. 2. In this context it is irreproducible why decorative paper imitating the appearance of wood species are excluded from this requirement since natural products such as wooden veneer shall be promoted to bring SFM and social and economic aspects in all countries of the world to a good level. 3. If this requirement will remain, even the exemption of paper will be cancelled, lots of furniture, flooring, decorative and other products will not be able to carry any FSC label anymore. 4. This is obviously discriminating wooden veneer and in contradiction to the social movement that wishes to come back to nature turning away from plastics. 5. It is an erroneous believe that this requirement will avoid misleading claims or the misuse of claims. 6. FSC should be happy that at least parts of the products are FSC-certified. 7. If this requirement will remain, lots of companies and certificate holders will refrain from FSC worldwide.	Delete completely without substitution



3.2.4	G	<p>The concept that visible / name giving parts of a product should be certified, is appropriate.</p> <p>But currently, a change to this concept is not feasible, because the needed FSC quantities with the necessary quality (for packages, veneers, etc.) are not available in the market.</p> <p>First of all an advancement of certified forest areas needs to be done in order to ensure the availability of primary wood types (e.g. oak, beech).</p> <p>Afterwards the concept should be integrated step-by-step in the Standards and, dependent on the change of certified wood areas, it should also be a part of the next revision process in the year 2020 again.</p>	
3.2.4	G	<p>Classification and control of input material</p> <p>This regulation has to be refused.</p> <p>Motion 43 of the IA 2011 asked for an avoiding misleading claims and communications in relation to FSC Mix products. certificate shall communicate truthfully and transparent about FSC Mix products whose visible and characterizing components are not FSC-certified but are instead Controlled Wood. Motion 43 does not call explicit for certificated wood components whose species characterizes the name of the product.</p>	<p>A new regulation has to be created in order to allow a customer-communication as mentioned in Motion 43. This could be done by terms like "component/wood coming from controlled sources".</p>
3.2.4	G	<p>3.2 Classification and control of input material</p> <p>The in the draft mentioned restrict regulations will lead to a decreasing quantities of products in the markets. Especially parquet and products with veneer will be affected because of a lack of certified raw-material for the deckings and veneers. Relevant producers will withdraw FSC certified product lines and maybe will go to production of PEFC-Products. Therefore this strict regulation will damage the FSC market and reputation.</p>	
3.2.4	G	<p>In this NOTE decorative paper must not be FSC-certified. In the regulation of Part 9 credit system 9.3.4+9.3.5 is the requirement that the melamine paper top layer must be certified. This is a dissent with this regulation.</p>	
3.2.4	G	<p>3.2.4 Motion 43</p> <p>The main reason we feel this proposed change will create sourcing issues, not just for us, but any company producing FSC assembled wood Furniture, is the fact that there is just not enough FSC 100% or FSC Mix veneer, lumber and edgbanding available to sustain the industry needs.</p> <p>To give you an idea we purchased last year approximately 3 million square feet of veneer with matching quantities of edgbanding and lumber all of which was purchased as FSC Controlled Wood.</p> <p>Please understand further, that we purchase the veneers based on customer demanded quality, color and grading requirements, which minimizes the amount FSC certified material available to us to an even smaller amount.</p> <p>I also would like to point out that we purchase most of our lumber locally harvested, from privately owned forests within The Appalachian Hardwood Region, all of which use sustainable practices passed down from generations.</p> <p>These landowners are too small to participate in the FSC Chain of custody program, but for sure produce sustainable lumber products that we currently purchase with a Controlled Wood claim.</p> <p>Based on the new standard we would have to purchase lumber form other regions of the US or possibly even the world. That would add a tremendous amount of freight to the wood products, which is not only contradictory to the FSC sustainability philosophy, but would also not improve sustainable forestry, as the local landowners do as good if not a better job than the foresters in other regions, just not under the FSC umbrella.</p> <p>While we understand the intend to eliminate misleading the consumer, we would like to suggest to maybe reword the Claim</p>	<p>Our suggestion for product that has an FSC Mix claim, but uses controlled wood in the manufacturing would be along the lines of the following:</p> <p>"FSC Mix with Controlled Wood content"</p> <p>This could satisfy Motion 43 while giving the industry still the ability to source the necessary materials and in our case even purchase locally.</p>

		<p>instead of cutting off the supply for a whole industry, which we believe could have a negative effect on FSC in general.</p> <p>One problem we have in sourcing FSC materials is that our industry, represented by BIFMA, is rather small in comparison with the home furnishings industry which uses the same wood and veneer mills as we do. They have virtually no requirements from their customers, mostly at retail, therefore the mills who service both our industries simply feel like the demand for FSC doesn't merit the additional cost and paperwork for such a small percentage of their users.</p> <p>About two years ago, we were lucky enough to have a very large, multi- million dollar order, from Nomura. Their requirement was for FSC Anigre veneer moreover, they were very specific about the quality and pattern of this veneer. We had a terrible time securing enough, at a very high price, to meet their timeline and quality requirements.</p> <p>Tommy Rhoney our veneer buyer, says that in the past few years, although a number of manufacturers now offer FSC products, the supply has not increased at all. Frankly, it is up to the forest growers to give us the supply that we need and that situation is not improving.</p> <p>If FSC institutes this change on not using controlled wood, we would probably lose 60% of our business, depending on large projects. Obviously, this means less use of FSC materials also for us and other wood manufacturers.</p>	
3.2.4	G	<p>This new requirement will significantly reduce the ability to source edgebanding and veneers for many species from any country at any price, as there are simply not enough resources available in FSC 100 % or FSC mixed. Currently these items can be sourced as FSC controlled without impacting the claim.</p>	<p>Eliminate this new requirement. And leave the assembled wood products section as it stands in current version.</p>
3.2.4	G	<p>This additional requirement is related to the name or description of a product made from FSC product. It exempts laminated papers but it could impact laminate product with minor components made from solid wood. I.E. a 'cherry' cabinet with a 'maple' knob stained to match.</p> <p>Additional concerns with supply base not being able to supply certified face materials versus controlled wood.</p> <p>This requirement could, or at times does, lead to less Sustainable forest habits in order to produce FSC Certified veneer faces, versus allowing usage of CW materials. There is not an abundant source of Certified veneer at a quality level to be used, and thus the usage of CW allow for more sustainable usage of raw forest materials.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Products that contain minor wood components of mixed species that are not the major wood species or major component of a product are exempt. An example of cherry desk with wooden pull knobs, plinths, or feet made of maple finished to look like cherry.</p>
3.2.4	G	<p>This additional requirement is related to the name or description of a product made from FSC product. It exempts laminated papers but it could impact laminate product with minor components made from solid wood. I.E. a 'cherry' cabinet with a 'maple' knob stained to match.</p> <p>Additional concerns with supply base not being able to supply certified face materials versus controlled wood.</p> <p>This requirement could, or at times does, lead to less Sustainable forest habits in order to produce FSC Certified veneer faces, versus allowing usage of CW materials. There is not an abundant source of Certified veneer at a quality level to be used, and thus the usage of CW allow for more sustainable usage of raw forest materials.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Products that contain minor wood components of mixed species that are not the major wood species or major component of a product are exempt. An example of cherry desk with wooden pull knobs, plinths, or feet made of maple finished to look like cherry.</p>

3.2.4	G	<p>This additional requirement is related to the name or description of a product made from FSC product. It exempts laminated papers but it could impact laminate product with minor components made from solid wood. I.E. a 'cherry' cabinet with a 'maple' knob stained to match.</p> <p>Additional concerns with supply base not being able to supply certified face materials versus controlled wood.</p> <p>This requirement could, or at times does, lead to less Sustainable forest habits in order to produce FSC Certified veneer faces, versus allowing usage of CW materials. There is not an abundant source of Certified veneer at a quality level to be used, and thus the usage of CW allow for more sustainable usage of raw forest materials.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Products that contain minor wood components of mixed species that are not the major wood species or major component of a product are exempt. An example of cherry desk with wooden pull knobs, plinths, or feet made of maple finished to look like cherry.</p>
3.2.4	G	<p>This additional requirement is related to the name or description of a product made from FSC product. It exempts laminated papers but it could impact laminate product with minor components made from solid wood. I.E. a 'cherry' cabinet with a 'maple' knob stained to match.</p> <p>Additional concerns with supply base not being able to supply certified face materials versus controlled wood.</p> <p>This requirement could, or at times does, lead to less Sustainable forest habits in order to produce FSC Certified veneer faces, versus allowing usage of CW materials. There is not an abundant source of Certified veneer at a quality level to be used, and thus the usage of CW allow for more sustainable usage of raw forest materials.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Products that contain minor wood components of mixed species that are not the major wood species or major component of a product are exempt. An example of cherry desk with wooden pull knobs, plinths, or feet made of maple finished to look like cherry.</p>

3.2.4	G	<p>For both wood products such as hardwood plywood and engineered wood flooring, there can be multiple species in the face, wear layer, core veneers, and back. A marketing description (oak flooring) does not describe the wood species in that product. In fabricated products where solid wood, engineered veneer products and composite materials (particleboard, MDF, HDF, etc.), the species could likely be a myriad of wood species for a consumer product labeled a “cherry desk” for example. Moreover, the face materials may not even be cherry. Birch and maple are frequently interchanged. Focusing on the “what” gives a product its name pushes FSC into the universe of marketing claims.</p> <p>FSC should stick to its sphere of influence and police the FSC categories and their respective labeling requirements.</p> <p>This proposal forecloses virtually all North American produced face veneer which is not produced in any significant volume as FSC 100% but when combined in products such as VC hardwood plywood or compressed panel cores that are FSC COC, these material are appropriately labeled and marketed under the FSC program. There is no justification given for why this change is necessary.</p> <p>If it’s a marketing effort to grow the FSC program, then the justification given for the change being driven by concern for a consumer expecting FSC cherry cabinets be based solely on the face is completely specious.</p> <p>In the U.S., composite panels such as particleboard and MDF are exempt currently from the Lacey Act because the species, sources, and country of origin are so completely homogenized in a wood soup, they cannot comply with the current Lacey requirements for species identification or COC designation. This proposal removes a large source of supply from North America which the FSC program doesn’t currently reach. Wood veneer which is at the lowest risk for illegality and FSC in North America recognizes.</p> <p>In North America, FSC 100% veneer is not available in commercial quantities if at all. Above all FSC Mix is not an option for decorative veneers. They are a single species. This will put pressure on designers of furniture, doors and panels to look for alternatives to real wood when FSC is specified.</p> <p>A laminated paper product could be allowed to give the name to the product as FSC certified. Under this proposal paper has in practice far more FSC Controlled wood inside as almost all paper is produced as FSC Mix credit. The only difference with wood veneer is that, as a natural wood product and unique species, it cannot be mixed-up in a veneer, but different tree species’ fibers are virtually always a mixture or different species in paper products and attain the FSC Mix status. FSC should for this reason not discriminate against wood veneer which can never be a mix.</p>	<p>“For FSC Mix assembled wood products, the visible wood component whose species (e.g. cherry or maple) characterizes and gives its name to the product (e.g. “cherry cabinets” made from cherry veneer and MDF; “maple engineered flooring” made of maple wear layers on pine platforms) shall be labelled according to the certification status of the component parts: e.g. “Cherry Cabinets made from Cherry Veneer on FSC Mix MDF.” Note: This applies to other component products such as laminated paper products who give the name to the product (e.g. “Cherry-look cabinets made from cherry- printed FSC Mix paper and MDF”, or, if the paper is not FSC certified, “made from cherry-printed paper and FSC Mix MDF”).”</p>
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3.2.4	G	<p>If the true intent of Motion 43 was specifically to protect consumer interests: “a consumer would expect that the oak-veneer of an FSC-certified oak-kitchen is FSC-certified.” The reality is the cabinet or furniture is a mix of species, a mix of solid wood, wood veneer, and composite wood products. The reality is a consumer buying an oak desk, unless it’s all solids, ever gets an “oak desk”. Consumer interests are not served by allowing laminates to label paper as hardwood. This is a far more misrepresentation.</p> <p>This proposal elevates paper and laminates masquerading as real wood under FSC to further mislead the consumer in practice. The consumer’s expectation that the oak-look of a desk is actually oak is branded as “it must be oak because the FSC label says it is”. That is a treacherous assumption under the best of circumstances.</p> <p>It’s not the species that matters, but where the products appropriately fits into the FSC scheme of things.</p> <p>The trademark issue is a red herring. It should not be FSC’s intent to “deceive” a consumer in what fabricated product they are purchasing by the FSC label. Both the FSC label and the product need to inform the consumer what it is they are actually buying. Mixed species and mixed materials are the norm.</p>	<p>“For FSC Mix assembled wood products, the visible wood component whose species (e.g. cherry or maple) characterizes and gives its name to the product (e.g. “cherry cabinets” made from cherry veneer and MDF; “maple engineered flooring” made of maple wear layers on pine platforms) shall be labelled according to the certification status of the component parts: e.g. “Cherry Cabinets made from Cherry Veneer on FSC Mix MDF.” Note: This applies to other component products such as laminated paper products who give the name to the product (e.g. “Cherry-look cabinets made from cherry- printed FSC Mix paper and MDF”, or, if the paper is not FSC certified, “made from cherry-printed paper and FSC Mix MDF”).”</p>
3.2.4	G	<p>The concept that visible / name giving parts of a product should be certified, is appropriate.</p> <p>But currently, a change to this concept is not feasible, because the needed FSC quantities with the necessary quality (for packages, veneers, etc.) are not available in the market.</p> <p>First of all an advancement of certified forest areas needs to be done in order to ensure the availability of primary wood types (e.g. oak, beech).</p> <p>Afterwards the concept should be integrated step-by-step in the Standards and, dependent on the change of certified wood areas, it should also be a part of the next revision process in the year 2020 again.</p>	
3.2.4	G	<p>This additional requirement is related to the name or description of a product made from FSC product. It exempts laminated papers but it could impact laminate product with minor components made from solid wood. I.E. a ‘cherry’ cabinet with a ‘maple’ knob stained to match.</p>	<p>Products that contain minor wood components of mixed species that are not the major wood species or major component of a product are exempt from being actual species if they are less than X% of volume of wood in a product. An example of cherry desk with wooden pull knobs, plinths, or feet made of maple finished to look like cherry.</p>
3.2.4	T	<p>This clause excludes the possibility to assemble e.g. FSC Controlled Wood veneer with a MDF base material. Especially interior manufacturers will have problems with this because a lot of veneer is FSC Controlled Wood. Often the veneer is a very small part of the total product and the base material is FSC mix credit. If you would calculate the total percentage of certified wood/fibre in the finished product, it will be a lot more than 70% (the minimum requirement for labeling).</p>	<p>Change into: For FSC Mix assembled wood products, if the visible wood component whose species (e.g. oak or maple) characterizes and gives its name to the product (e.g. “cherry cabinets” made from cherry veneer and MDF; “maple engineered flooring” made of maple wear layers on pine platforms) <b>and is not FSC certified (FSC 100%, FSC Mix or FSC Recycled), the material category of this component shall be separately described on the sales documentation.</b></p>

3.2.4	G	<p>The language that 3.2.4 does not apply to decorative paper imitating wood</p> <ul style="list-style-type: none"> <li>- implies that laminated melamine could carry the FSC label that includes the name of the hardwood specie it purports to be, but the real wood veneer alternative could not include the FSC logo and the name of the actual product,</li> <li>- seems to indicate that the paper covering could be FSC Controlled Wood and still carry the FSC Mixed label, and</li> <li>- this exception was not included in Motion 43 or its purpose.</li> </ul>	<p>“For FSC Mix assembled wood products, the visible wood component whose species (e.g. cherry or maple) characterizes and gives its name to the product (e.g. “cherry cabinets” made from cherry veneer and MDF; “maple engineered flooring” made of maple wear layers on pine platforms) shall be labelled according to the certification status of the component parts: e.g. “Cherry Cabinets made from Cherry Veneer on FSC Mix MDF.” Note: This applies to other component products such as laminated paper products who give the name to the product (e.g. “Cherry-look cabinets made from cherry- printed FSC Mix paper and MDF”, or, if the paper is not FSC certified, “made from cherry-printed paper and FSC Mix MDF”).”</p> <p>Such revelations can only serve consumer interests instead of deepening misinformation and misrepresentation of product and weakening the FSC brand.</p>
3.2.4	T	<p>FSC has cited their Trademark department in explaining that FSC does not want to get involved in validating marketing claims made by users of the FSC logo except as it pertains to FSC content.</p> <ul style="list-style-type: none"> <li>- This claim is a bit contrary to the explanation that accompanied Motion 43: “This motion aims to...restrict the use of solid wood veneer used as visible face veneer on top of the other materials only to FSC-certified materials in cases where the product is sold under the name of this visible face veneer.”</li> <li>- If this is truly a trademark issue, and FSC has no control over what a company calls its product, then a company could choose to make separate claims on the product and label a maple-veneered desk so long as the likelihood of confusion was minimized with punctuation: “Maple Wood. FSC Mix Certified Desk,” or “Maple Veneer. FSC Certified Desk.”</li> <li>- This would be 100% compliant with trademark use as the company does not claim any FSC on the Maple wooden top layer.</li> <li>- Nevertheless, for the printed paper Maple imitation, in theory, it could be called “FSC mix Maple laminated desk”.</li> </ul>	<p>“For FSC Mix assembled wood products, the visible wood component whose species (e.g. cherry or maple) characterizes and gives its name to the product (e.g. “cherry cabinets” made from cherry veneer and MDF; “maple engineered flooring” made of maple wear layers on pine platforms) shall be labelled according to the certification status of the component parts: e.g. “Cherry Cabinets made from Cherry Veneer on FSC Mix MDF.” Note: This applies to other component products such as laminated paper products who give the name to the product (e.g. “Cherry-look cabinets made from cherry- printed FSC Mix paper and MDF”, or, if the paper is not FSC certified, “made from cherry-printed paper and FSC Mix MDF”).”</p> <p>Such revelations can only serve consumer interests instead of deepening misinformation and misrepresentation of product and weakening the FSC brand.</p>
3.2.4	G	<p>Hardwood veneers and lumber face market pressure already from mislabelled and misleading laminated products that purport to be the actual wood they are imitating.</p> <ul style="list-style-type: none"> <li>- Hardwood veneers enjoy a superior life-cycle assessment as compared to laminated alternatives, are a renewable resource, and are the healthier option for the end-consumer.</li> <li>- If laminated “fake wood” can carry the FSC label, and the real wood alternative cannot, hardwood veneers face yet another challenge in the surface material market because the end-consumer can no longer tell the difference between imitation and real wood.</li> <li>- It is not in FSC’s interest to displace real wood in the marketplace.</li> </ul>	

3.2.4	T	<p>If the laminated paper product is allowed to give the name to the product as FSC certified, that paper has in practice far more FSC Controlled wood inside as almost all paper is produced as FSC Mix credit. The only difference with wood veneer is that, as a natural wood product and unique species, it cannot be mixed-up, but different tree species' fibres can indeed be mixed-up in paper products and attain the FSC Mix status. FSC should for this reason not discriminate against wood veneer.</p> <ul style="list-style-type: none"> <li>· The intent of Motion 43 was specifically to protect consumer interests: "a consumer would expect that the oak-veneer of an FSC-certified oak-kitchen is FSC-certified."</li> <li>- Consumer interests are not served by allowing laminates to label paper as hardwood.</li> <li>- A consumer would expect that the oak-look of a desk is oak.</li> <li>· In its entirety, Motion 43 will create market disturbances that go beyond the laminate vs. wood debate: in North America, FSC 100% or FSC Mix veneer is not available in commercial quantities if at all, since Mix is not really an option for decorative veneers. This will put pressure on designers of furniture, doors and panels to look for alternatives to real wood when FSC is specified.</li> </ul>	<p>"For FSC Mix assembled wood products, the visible wood component whose species (e.g. cherry or maple) characterizes and gives its name to the product (e.g. "cherry cabinets" made from cherry veneer and MDF; "maple engineered flooring" made of maple wear layers on pine platforms) shall be labelled according to the certification status of the component parts: e.g. "Cherry Cabinets made from Cherry Veneer on FSC Mix MDF." Note: This applies to other component products such as laminated paper products who give the name to the product (e.g. "Cherry-look cabinets made from cherry- printed FSC Mix paper and MDF", or, if the paper is not FSC certified, "made from cherry-printed paper and FSC Mix MDF")."</p> <p>Such revelations can only serve consumer interests instead of deepening misinformation and misrepresentation of product and weakening the FSC brand.</p>
3.2.4		<p>This point refers to a decision from the International General Assembly, which actually only says that a guideline is needed and should be developed to prevent misleading communication around FSC Mix products. The guideline should help certificate holder to inform truthfully and transparent about FSC Mix products, if visible and defining parts (e.g. the visible part of a laminate wood flooring, veneered furniture and furniture made of solid wood components with chipboard as supporting material) from an FSC-certified product are not FSC-certified, but consist of Controlled Wood. Therefore, as outlined before, it is not demanded that the defining material must consist of FSC-certified material. This approach would reduce the value of Controlled Wood, which after all, comes from sources that already meet very high standards and lead e.g. to significantly better living and working conditions of people who live from and work in forests.</p>	<p>In particular the standard clause is to be rejected in its sharp formulation, because it would lead to a situation, where otherwise the supply situation for example for veneer (e.g. oak veneer) for the production of parquet floor would decline immediately and therefore FSC-certified products would disappear from markets to a considerable extent.</p>
3.2.4	E	<p>This is totally untenable for my company. At best, it will increase my plywood costs by 10% (the premium I currently pay for FSC100% material) and what I fear is that it will create a shortage of FSC100% veneer in the marketplace and lengthen lead times and increase cost even further. This would drive most of my FSC business to non-FSC.</p>	<p>Dump this clause flat out.</p>
3.2.4		<p>Not an issue for us but an issue with the system. This will severely limit FSC plywood by requiring the face veneer to be certified to make the claim regardless of the percentage of credit material in the core. This could potentially be damaging on the supply side. One of the key weaknesses in FSC has been generating demand on the solid wood and value added side. This will limit growth in an area that is critical to drive an increase in Forest Management certificates. If a manufacturing can take a credible claim to market on high value products, they should be encouraged to do so. This is better for the system as a whole.</p>	

3.2.4	G	<p>Eggers Industries has been FSC certified since 2002. We have provided thousands of FSC certified mix % products in high profile projects throughout the United States. As FSC has progressed through the years Eggers has been receptive to changes which impacts the integrity of FSC products. Most recently the requirement to use FSC controlled wood and FSC COC wood as the only eligible inputs for outputs with FSC claims. This was an important step moving forward so that all wood was accounted for in regards to sourcing, legality, preservation, indigenous rights, etc. To require the visible component in an assembled mix % claim to be FSC COC material will add costs to products, reduce availability of specific species, veneer grades and grain/figure configurations and risk the reduction of FSC products specified for architectural products. Currently architects can specify if FSC COC veneer is required for their project, they work with the builder owner in writing the specifications for their project and therefore can control what the visible surface of their product is. I do not believe FSC needs to dictate to a building owner, architect or designer what he needs as the visible surface of their end product.</p> <p>Due to the LEED certified wood credit in previous LEED versions FSC has seen increased volume in the amount of FSC certifications and products. LEED v4 puts FSC certified products on the same contribution level as products with recycled content. When we are in an age where value engineering is the norm adding financial penalties by requiring FSC COC materials for the visible surfaces will have architects, building owners and designers reassessing the need to specify a FSC certified product for a LEED building.</p>	Leave as is for CW wood allowed for visible surfaces
3.2.4	T	<p>We have checked the motions of the general assembly in 2011. The clause 3.2.4. does not consider the motion 43 in it's intention, but that the clause considerer the original text of the motion, which has been amended before it passed. We are flabbergasted about it. We had the understanding that FSC is a system that relies on results of a dialogue process to find compromise, which are implemented and lived with. We realized now, that a motion, that is a result of a compromise, is lifted in a "secret" manner. This should not be allowed. We reject the clause 3.2.4. in it's current content and request to consider in detail the intention and content of motion 43.</p>	
3.2.4	T	<p>The new requirement 3.2.4 has the potential to heavily affect certificate holders who produce assembled wood products and may well lead to those companies leaving the program.</p> <p>The implementation of this clause would make the production of assembled wood products extremely limiting, and therefore decrease the amount of available FSC certified assembled wood products on the market. There may be a shift in the types of assembled wood products that are available as high-quality products become more difficult to make with an FSC claim, certificate holders will shift to providing FSC certified products on composite products and paper laminates where this requirement will not affect their ability to supply FSC.</p> <p>Additionally, the proposed requirement appears to go far beyond what was proposed in the related GA motion. The motion seems to be about communicating truthfully and clearly about the FSC Mix label and making sure consumers are informed about their purchases. However, it does not ask that all the visible characterizing components be FSC certified, but to only provide truthful labelling when controlled wood is used. Also important to note, this new requirement does not address the concerns expressed through the motion, as FSC Mix Credit veneers used as face veneer in an assembled product may actually be from a tree that was sourced from a noncertified, but controlled origin. This is the main function of a credit system.</p>	The PSU needs to carefully consider the consequences of this change. It may make more sense to address this motion in a review of the trademark standard that is scheduled for 2015, and remove this requirement from the standard altogether. Otherwise there is great risk of attrition from the program as companies are no longer able to make FSC claims.



3.2.4	G/T	This change raises concerns for us that we will be unable to supply the general contractors and design teams with enough FSC product that will meet the established criteria for the projects we are working on. This could lead to the project team abandoning the FSC specification and using either uncertified material or some other certification scheme.	Eliminate proposed change.
3.2.4	G	This criterion does not correspond with motion 43 from 2011 and does not make any sense with its current wording. The motion didn't prohibit FSC products where the name giving species wasn't certified, it merely required it to be clearly stated on the product that this was the case. Added to that, the current wording allows the name giving species to be FSC Mix, which directly contradicts the intention of the motion. The logic in the motion (as we understand and support it) is that the name giving species in a FSC certified product needs to originate from an actual FSC certified forest and if this is not the case, it should be clearly stated on the product.	Move this section to the trademark standard or under the labelling requirements of this standard.
3.2.4	T	Note for decor paper must be remained!	
3.2.4	T	There is a contradiction of section 9.3.4 and 3.2.4. When décor paper is excluded from certification of assembled products in section 3.2.4, however as referenced 9.3.4. input credit accounts are obligatory and per component within a product claim-contributing inputs must exist, this is a contradiction.	Need of clarification
3.2.4	G	The requirement about certifying the visible wood component, which gives a name to an FSC Mix assembled wood product, is considered as reasonable and supported by FSC Russia	No change required
3.2.4	G	<p>This proposed new requirement has been very controversial amongst North American certificate holders as there are many concerns that this may undermine the FSC certification program in North America and globally for assembled wood products and their associated supply chains. The implementation of this clause would make the production of assembled wood products extremely limiting, and therefore decrease the amount of available FSC certified assembled wood products on the market. There may be a shift in the types of assembled wood products that are available as high-quality products become more difficult to make with an FSC claim, certificate holders will shift to providing FSC certified products on composite products and paper laminates where this requirement will not affect their ability to supply FSC.</p> <p>One small and potentially short term benefit to this new requirement may be seen in the veneer manufacturing industry as they may see an increased demand for FSC certified veneer as a result of this requirement. However, the veneer manufacturers should also experience a boost from the clarification provided in section 9, and without the risk to the rest of the supply chain. Section 9 revisions have clarified that assembled wood products must have credit accounts for each component, where previously credit accounts could be built on just one of the inputs.</p> <p>Additionally, the proposed requirement appears to go far beyond what was proposed in the related GA motion. The motion is about communicating truthfully and clearly about the FSC Mix label and making sure consumers are informed about their purchases. However, it does not ask that all the visible characterizing components be FSC certified, but to only provide truthful labelling when controlled wood is used. Also important to note, this new requirement does not address the concerns expressed through the motion, as FSC Mix Credit veneers used as face veneer in an assembled product may actually be from a tree that was sourced from a noncertified, but controlled origin. This is the main function of a credit system.</p>	This motion should be addressed in a review of the trademark standard that is scheduled for 2015, and this requirement should be removed from the standard altogether.

3.2.4	G	This regulation has to be refused. Motion 43 of the IA 2011 asked for a avoiding misleading claims and communications in relation to FSC Mix products. certificate shall communicate truthfully and transparent about FSC Mix products whose visible and characterizing components are not FSC-certified but are instead Controlled Wood. Motion 43 does not call explicit for certificated wood components whose species characterizes the name of the product.	A new regulation has to be created in order to allow a customer-communication as mentioned in Motion 43. This could be done by terms like “component/wood coming from controlled sources”.
3.2.4	G	Point 3.2.4 must be refused. FSC Mixed assembled wood products like MFC must be allowed to use CW-paper because the mentioned FSC certified products are not receivable otherwise large volumes of certified products get lost to the FSC-label.	
3.2.4	G	Strongly support this requirement. It is important that the solid wood veneer used as the visible face on top of other materials is FSC certified as this is what the consumer assumes when they are buying the FSC certified product. At minimum as per comment above what is actually FSC certified must be clear – including to the end consumer.	Move this section to the trademark standard or under the labelling requirements of this standard.
3.2.4		<p>Clause 3.2.4 is rejected in this form. The provision in the standard draft does not consider the Motion 43/2011. The Motion 43/2011 does only require a true and transparent communication, which clarifies that visible and/or name-giving components might not be certified themselves, but have a Controlled Wood status. The motion was a result of a discussion on the General Assembly and the original motion was less drastic. However clause 3.2.4 takes up the original fare reaching formulation. Due to this the result of the deliberation process of the General Assembly has not been considered. This contradicts the constituting idea of FSC to generate a consensus, which is supported by all chambers.</p> <p>2. If clause 3.2.4 would be adopted as formulated, that the clause mirrors the motion 43, a provision need to be found that allows a communication on the product as intended. The use of the term “Controlled Wood” or an alternative claim needs to be permitted.</p> <p>3. The requirements as formulated in the draft will result in a wide range of products (such as flooring) might not be eligible to carry the FSC label. The volume that could be produced does not match current demand and market opportunities. This will result in a limited use of the FSC label on-product and a limited contribution to consumer awareness of the FSC brand.</p>	
3.2.4	G	If the above draft requirement is added to the FSC standard, all veneer identified by species would need to be FSC certified. FSC controlled wood veneer will no longer be allowed. This change drastically alters the ability of office furniture manufacturers to supply FSC certified product. The supply of FSC certified veneer is spotty and unreliable and often at quite a large price increase. In addition to these issues, often the FSC certified wood is coming from very similar locations as the controlled wood. This begs the question if we are trying to solve the right sustainability issues or just trying to increase the number of certified forests. Does this requirement create sustainable value for forests?	Remove

3.2.4	G	<p>This additional requirement is related to the name or description of a product made from FSC product. It exempts laminated papers but it could impact laminate product with minor components made from solid wood. I.E. a 'cherry' cabinet with a 'maple' knob stained to match.</p> <p>Additional concerns with supply base not being able to supply certified face materials versus controlled wood.</p> <p>This requirement could, or at times does, lead to less Sustainable forest habits in order to produce FSC Certified veneer faces, versus allowing usage of CW materials. There is not an abundant source of Certified veneer at a quality level to be used, and thus the usage of CW allow for more sustainable usage of raw forest materials.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Products that contain minor wood components of mixed species that are not the major wood species or major component of a product are exempt. An example of cherry desk with wooden pull knobs, plinths, or feet made of maple finished to look like cherry.</p>
3.2.4	G	<p>This additional requirement is related to the name or description of a product made from FSC product. It exempts laminated papers but it could impact laminate product with minor components made from solid wood. I.E. a 'cherry' cabinet with a 'maple' knob stained to match.</p> <p>Additional concerns with supply base not being able to supply certified face materials versus controlled wood.</p> <p>This requirement could, or at times does, lead to less Sustainable forest habits in order to produce FSC Certified veneer faces, versus allowing usage of CW materials. There is not an abundant source of Certified veneer at a quality level to be used, and thus the usage of CW allow for more sustainable usage of raw forest materials.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Products that contain minor wood components of mixed species that are not the major wood species or major component of a product are exempt. An example of cherry desk with wooden pull knobs, plinths, or feet made of maple finished to look like cherry.</p>
3.2.4	G	<p>This additional requirement is related to the name or description of a product made from FSC product. It exempts laminated papers but it could impact laminate product with minor components made from solid wood. I.E. a 'cherry' cabinet with a 'maple' knob stained to match.</p> <p>Additional concerns with supply base not being able to supply certified face materials versus controlled wood.</p> <p>This requirement could, or at times does, lead to less Sustainable forest habits in order to produce FSC Certified veneer faces, versus allowing usage of CW materials. There is not an abundant source of Certified veneer at a quality level to be used, and thus the usage of CW allow for more sustainable usage of raw forest materials.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p> <p>Provide additional scenario examples related to complex products.</p>	<p>For FSC Mix assembled wood products, the visible wood component whose species (e.g. oak or maple) characterizes and gives its name to the product (e.g. "cherry cabinets" made from cherry veneer and MDF; "maple engineered flooring" made of maple wear layers on pine platforms) shall be FSC certified (FSC 100%, FSC Mix or FSC Recycled) OR FSC Controlled Wood as long as the customer is notified in product documentation (sales literature, website or sales documents). NOTE: This requirement does not apply to decorative paper imitating the appearance of wood species.</p> <p>Products that contain minor wood components of mixed species that are not the major wood species or major component of a product are exempt. An example of cherry desk with wooden pull knobs, plinths, or</p>

			feet made of maple finished to look like cherry.
3.2.4	G/T	<p>It is not acceptable to have the following paragraph in this or in other FSC-standards:          “For FSC Mix assembled wood products, the visible wood component whose species (e.g. oak or maple) characterizes and gives its name to the product (e.g. “cherry cabinets” made from cherry veneer and MDF; “maple engineered flooring” made of maple wear layers on pine platforms) shall be FSC certified (FSC 100%, FSC Mix or FSC Recycled).          NOTE: This requirement does not apply to decorative paper imitating the appearance of wood species.”</p> <p>1.This is in contradiction to the inherent basics of FSC goals that is presented at landing page of <a href="https://ic.fsc.org/">https://ic.fsc.org/</a>:</p> <ul style="list-style-type: none"> <li>• Promoting the responsible management of forests worldwide           <ul style="list-style-type: none"> <li>o Environmentally Appropriate; Protecting and maintaining natural communities and high conservation value forests.</li> <li>o Socially Beneficial; Respecting the rights of workers, communities and indigenous peoples.</li> <li>o Economically Viable;Building markets, adding best value, and creating equitable access to benefits.</li> </ul> </li> </ul> <p>2. In this context it is irreproducible why decorative paper imitating the appearance of wood species are excluded from this requirement since natural products such as wooden veneer shall be promoted to bring SFM and social and economic aspects in all countries of the world to a good level.</p> <p>3. If this requirement will remain, even the exemption of paper will be cancelled, lots of furniture, flooring, decorative and other products will not be able to carry any FSC-label anymore.</p> <p>4. This is obviously discriminating wooden veneer and in contradiction to the social movement that wishes to come back to nature turning away from plastics.</p> <p>5. It is an erroneous believe that this requirement will avoid misleading claims or the misuse of claims.</p> <p>6. FSC should be happy that at least parts of the products are FSC-certified.</p> <p>7. If this requirement will remain, lots of companies and certificate holders will refrain from FSC worldwide.</p>	Delete completely without substitution
3.2.4	T	Beyond the given name, the enterprise can promote the product with an specific specie with its name, but do not include the commercial name (given name).	Include safeguards in 3.2.4 to ensure that the company will not promote and / or use the specie as a given name to the product.

3.2.4	G	This requirement will cause many already labelled products and product lines to be unable to carry a label or future possibility of labelling because the CW face veneers are not currently available as FSC Mix.	This should be carefully considered to prevent attrition in the FSC Certificate holder base. If this is required it should have a phase in date to prevent already labelled products from being required to remove labels on an interim basis.
3.2.4	T	In this indicator still remains the idea that if in a promotional material it is mentioned that a table is "FSC certified Oak table" and the invoice of this material is classified as "Table FSC Mix" still have a gap between what is in an invoice and what a company is promoting.	New indicator: 3.2.5 The promotional message of a certain product shall match the FSC claim stated on the invoice.
3.2.4	T	If adopted in the final version of the standard, this language will force many manufacturers of FSC-certified assembled wood products out of the system. The language reaches well beyond the requirements and intentions of Motion 43. This needs to be amended.	Delete this section and implement Motion 43 in the Trademark Standard.
3.2.4	G	Motion 43 of the IA 2011 does not call explicit for "certificated wood components whose species characterizes the name of the product." The proposed regulations will lead to a decreasing quantities of products in the markets. Especially parquet and products with veneer will be affected because of a lack of certified raw-material for the deckings and veneers. Relevant producers will have to withdraw FSC certified products.	
3.2.4	T	Section seems to mis-interpretation of requirements and intentions of policy motion 43 from GA 2011, which should be handled through the FSC Trademark Standard.	Transfer to the Trademark Standard, as suggested by Jason Grant.
3.2.4	G	This additional requirement is related to the name or description of a product made from FSC product. It exempts laminated papers but it could impact laminate product with minor components made from solid wood. I.E. a 'cherry' cabinet with a 'maple' knob stained to match.  Additional concerns with supply base not being able to supply certified face materials versus controlled wood. This requirement could, or at times does, lead to less Sustainable forest habits in order to produce FSC Certified veneer faces, versus allowing usage of CW materials. There is not an abundant source of Certified veneer at a quality level to be used, and thus the usage of CW allow for more sustainable usage of raw forest materials.  In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.	Products that contain minor wood components of mixed species that are not the major wood species or major component of a product are exempt. An example of cherry desk with wooden pull knobs, plinths, or feet made of maple finished to look like cherry.
3.2.4	T	In this indicator still remains the idea that if in a promotional material it is mentioned that a table is "FSC certified Oak table" and the invoice of this material is classified as "Table FSC Mix" still have a gap between what is in an invoice and what a company is promoting.	New indicator: 3.2.5 The promotional message of a certain product shall match the FSC claim stated on the invoice.
3.2.4	G	Confusing language and difficult for auditors to interpret consistently. It is also redundant to other FSC requirements.	Recommend that this clause be removed and stay with current species language.
3.2.4	G	The doorskin/plywood industry currently produces mainly FSC Mixed products. Less than 1% of the material we produce is FSC COC only. Most of our customers request material that is of mixed content. Example – Controlled Wood veneer (maple) on a FSC-COC backer/core. For my company we would sell this as FSC Mix 79.3%. We are concerned that there would no longer be any demand for an FSC product if it had to be FSC COC only. Not to mention a concern for the availability of veneer to as COC from suppliers as right now it is mainly readily available as Controlled Wood. Not all species are available as FSC COC.	Do not make proposed changes – continue to allow a mixed product. Ex. Controlled Wood veneer on a FSC-COC core for 2ply Doorskins or Thick Plywood Panels.

3.2.4	G	<p>The approach that visible / namgiving components of products should be certified is generally welcomed.</p> <p>However, in the current situation this requirement is not feasible, as the needed FSC-volumes and corresponding qualities (for flooring and as veneer) are not available on the market. There should be a phased approach. First to support more forest certification in order to achieve the availability of relevant timber species (such as oak and beech). Following this in the next revision of the standard in the year 2020 the requirement could be introduced step-by-step and based on the changes to the certified forest area.</p>	
3.2.4	G	<p>The use of controlled wood is vital to the wood veneer industry. Not allowing FSC controlled material on products is going to drive away any demand for using wood and shift everything to “fake” surfaces.</p>	<p>When describing products there should be a key word differentiating controlled vs certified material but still being able to use the label of maple/cherry/etc</p>
3.2.4	G	<p>Due to the lack of available veneer that is FSC 100%, this would be detrimental to our customers. Since CW requires much of the same oversight and characteristics as FSC 100%, we do not believe this would be misleading customers and/or being detrimental to the intent of FSC certified product. The focus should be on product content as a total; veneers account for less than 5% of total weight in most applications.</p>	<p>Do NOT require veneers to be FSC 100%. Maintain the current allowance of CW.</p>
3.2.4	G	<p>This additional requirement is related to the name or description of a product made from FSC product. It exempts laminated papers but it could impact laminate product with minor components made from solid wood. I.E. a ‘cherry’ cabinet with a ‘maple’ knob stained to match.</p> <p>Additional concerns with supply base not being able to supply certified face materials versus controlled wood.</p> <p>This requirement could, or at times does, lead to less Sustainable forest habits in order to produce FSC Certified veneer faces, versus allowing usage of CW materials. There is not an abundant source of Certified veneer at a quality level to be used, and thus the usage of CW allow for more sustainable usage of raw forest materials.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Products that contain minor wood components of mixed species that are not the major wood species or major component of a product are exempt. An example of cherry desk with wooden pull knobs, plinths, or feet made of maple finished to look like cherry.</p>
3.2.4	G	<p>The concept that visible / name giving parts of a product should be certified, is appropriate.</p> <p>But currently, a change to this concept is not feasible, because the needed FSC quantities with the necessary quality (for packages, veneers, etc.) are not available in the market.</p> <p>First of all an advancement of certified forest areas needs to be done in order to ensure the availability of primary wood types (e.g. oak, beech).</p> <p>Afterwards the concept should be integrated step-by-step in the Standards and, dependent on the change of certified wood areas, it should also be a part of the next revision process in the year 2020 again.</p>	

3.2.4	G/T	<p>It is not acceptable to have the following paragraph in this or in other FSC-standards:          “For FSC Mix assembled wood products, the visible wood component whose species (e.g. oak or maple) characterizes and gives its name to the product (e.g. “cherry cabinets” made from cherry veneer and MDF; “maple engineered flooring” made of maple wear layers on pine platforms) shall be FSC certified (FSC 100%, FSC Mix or FSC Recycled).          NOTE: This requirement does not apply to decorative paper imitating the appearance of wood species.”</p> <p>1.This is in contradiction to the inherent basics of FSC goals that is presented at landing page of <a href="https://ic.fsc.org/">https://ic.fsc.org/</a>:</p> <ul style="list-style-type: none"> <li>• Promoting the responsible management of forests worldwide             <ul style="list-style-type: none"> <li>o Environmentally Appropriate; Protecting and maintaining natural communities and high conservation value forests.</li> <li>o Socially Beneficial; Respecting the rights of workers, communities and indigenous peoples.</li> <li>o Economically Viable;Building markets, adding best value, and creating equitable access to benefits.</li> </ul> </li> </ul> <p>2. In this context it is irreproducible why decorative paper imitating the appearance of wood species are excluded from this requirement since natural products such as wooden veneer shall be promoted to bring SFM and social and economic aspects in all countries of the world to a good level.</p> <p>3. If this requirement will remain, even the exemption of paper will be cancelled, lots of furniture, flooring, decorative and other products will not be able to carry any FSC-label anymore.</p> <p>4. This is obviously discriminating wooden veneer and in contradiction to the social movement that wishes to come back to nature turning away from plastics.</p> <p>5. It is an erroneous believe that this requirement will avoid misleading claims or the misuse of claims.</p> <p>6. FSC should be happy that at least parts of the products are FSC-certified.</p> <p>7. If this requirement will remain, lots of companies and certificate holders will refrain from FSC worldwide.</p>	Delete completely without substitution
3.2.4	G	<p>This regulation has to be refused.          Motion 43 of the IA 2011 asked for an avoiding misleading claims and communications in relation to FSC Mix products. certificate shall communicate truthfully and transparent about FSC Mix products whose visible and characterizing components are not FSC-certified but are instead Controlled Wood. Motion 43 does not call explicit for certificated wood components whose species characterizes the name of the product.</p>	A new regulation has to be created in order to allow a customer-communication as mentioned in Motion 43. This could be done by terms like “component/wood coming from controlled sources”.
3.2.4		<p>The in the draft mentioned restrict regulations will lead to a decreasing quantities of products in the markets. Especially parquet and products with veneer will be affected because of a lack of certified raw-material for the deckings and veneers. Relevant producers will withdraw FSC certified product lines and maybe will go to production of PEFC-Products. Therefore this strict regulation will damage the FSC market and reputation.</p>	

3.2.4	T	<p>This requirement puts manufactures of assembled wood products at a disadvantage. The market, especially for exotic veneers, is not currently prepared for this change which will result in a reduction in FSC certified products on the market. In addition, it has been indicated by FSC IC that as long as the species name is not in the product name that this requirement will not be applicable. This is a loophole that makes this requirement weak as it would be easily avoided simply by changing the product name to exclude the species. Additionally, this requirement does not achieve its intent to guarantee that the visible wood component was sourced from an FSC certified forest, as it could be an FSC Mix input to the final production process. Any FSC Mix product could (based on percentage and credit system requirement) be composed of entirely material from non-certified forests. As such, this requirement does not add value to the system.</p> <p>Motion 43 was developed and approved with the intent of improving the labelling of FSC Mix products and meeting customer expectations for certified components of the product. This requirement as written fails to meet this motion.</p>	<p>Rainforest Alliance strongly believes that this motion is better addressed through changes to the trademark standards and education to consumers of what FSC claims and labels mean.</p> <p>An alternate option to address this motion can be to incentivize FSC 100% inputs to products, therefore created demand for more FSC certified forests. This incentive can occur in Section 10.1 Eligibility for labelling. By introducing a small, achievable threshold requirement of FSC 100% inputs into an FSC Mix product group, FSC can demonstrate clarity of the FSC Mix label, create demand for more FSC certified forest, therefore increasing the positive impacts on the world's forests.</p>
3.2.4	G	<p>Motion 43 of the IA 2011 does not call explicit for "certificated wood components whose species characterizes the name of the product."</p> <p>The proposed regulations will lead to a decreasing quantities of products in the markets. Especially parquet and products with veneer will be affected because of a lack of certified raw-material for the deckings and veneers. Relevant producers will have to withdraw FSC certified products.</p>	
3.2.4	G	<p>This additional requirement is related to the name or description of a product made from FSC product. It exempts laminated papers but it could impact laminate product with minor components made from solid wood. I.E. a 'cherry' cabinet with a 'maple' knob stained to match.</p>	<p>Products that contain minor wood components of mixed species that are not the major wood species or major component of a product are exempt from being actual species if they are less than X% of volume of wood in a product. An example of cherry desk with wooden pull knobs, plinths, or feet made of maple finished to look like cherry.</p>



3.2.4	G/T	<p>It is not acceptable to have the following paragraph in this or in other FSC-standards:          “For FSC Mix assembled wood products, the visible wood component whose species (e.g. oak or maple) characterizes and gives its name to the product (e.g. “cherry cabinets” made from cherry veneer and MDF; “maple engineered flooring” made of maple wear layers on pine platforms) shall be FSC certified (FSC 100%, FSC Mix or FSC Recycled).          NOTE: This requirement does not apply to decorative paper imitating the appearance of wood species.”</p> <p>1.This is in contradiction to the inherent basics of FSC goals that is presented at landing page of <a href="https://ic.fsc.org/">https://ic.fsc.org/</a>:</p> <ul style="list-style-type: none"> <li>• Promoting the responsible management of forests worldwide</li> <li>o Environmentally Appropriate; Protecting and maintaining natural communities and high conservation value forests.</li> <li>o Socially Beneficial; Respecting the rights of workers, communities and indigenous peoples.</li> <li>o Economically Viable;Building markets, adding best value, and creating equitable access to benefits.</li> </ul> <p>2. In this context it is irreproducible why decorative paper imitating the appearance of wood species are excluded from this requirement since natural products such as wooden veneer shall be promoted to bring SFM and social and economic aspects in all countries of the world to a good level.</p> <p>3. If this requirement will remain, even the exemption of paper will be cancelled, lots of furniture, flooring, decorative and other products will not be able to carry any FSC-label anymore.</p> <p>4. This is obviously discriminating wooden veneer and in contradiction to the social movement that wishes to come back to nature turning away from plastics.</p> <p>5. It is an erroneous believe that this requirement will avoid misleading claims or the misuse of claims.</p> <p>6. FSC should be happy that at least parts of the products are FSC-certified.</p> <p>7. If this requirement will remain, lots of companies and certificate holders will refrain from FSC worldwide.</p>	Delete completely without substitution
3.2.4	G	<p>The concept that visible / name giving parts of a product should be certified is appropriate.          But currently, a change to this concept is not feasible, because the needed FSC quantities with the necessary quality (for packages, veneers, etc.) are not available in the market.</p>	<p>First of all an advancement of certified forest areas needs to be done in order to ensure the availability of primary wood types (e.g. oak, beech).          Afterwards the concept should be integrated step-by-step in the Standards and, dependent on the change of certified wood areas, it should also be a part of the next revision process in the year 2020 again.</p>
3.2.4	G	<p>Whole branches (e. g. parquet flooring) will be extremely limited by this new requirement. The FSC label will disappear from many products.          Independent from the question whether this requirement is necessary or not, it is too easy to avoid (“We don’t use the wood species in the product name!”).</p>	<p>Analyse the market effect of this new requirement. Be aware of branches, companies and products which will be lost for FSC.</p>

3.2.4	T	This requirement will be impossible to implement in cases when company is sourcing identical FSC certified and controlled material. E.g. company is using Percentage system and is buying FSC certified logs and non-certified logs which are controlled including them into the own verification program. From these logs company is producing veneer from which makes plywood. Who can tell what veneer sheet is on the top – from certified log or controlled if logs are already mixed in the store? It is even more complicated if additionally some veneer is bought and fall into the production chain.	We understand that it is important to secure final customers' expectations regarding certification status of the bought product, therefore we would suggest to reformulate this requirement and not allow labelling such products, instead of restriction selling them as FSC certified.
3.2.4		Seems out of place and unnecessarily complicated for CoC and for manufacturers. Due to the nature of the credit system, an FSC Mix credit product, e.g. veneer, could potentially still be CW veneer v. FSC certified, so this requirement does not necessarily ensure the labelled, certified veneer is from an FSC certified forest. Would be better addressed within the upcoming trademark review.	Remove from CoC Standard and address in trademark review.
3.2.4	T	Motion 43 is being misused to support visible wood component restrictions. Certifications build customer loyalty based on trust. We can maintain trust and transparency without taking arbitrary measures to limit finished products wood use. If we need to change the credit system or % system to make it a system we trust and respect lets do it. This change is misplaced and wood used in finished products is not the place to do it. Frankly as a social chamber member and buyer of FSC wood, I see nothing wrong with a maple door or similar product having FSC CW used in the face veneer or similar. What we are doing at FSC is no different than wind energy credits. When you buy a FSC Maple Door to support responsible forestry. The correct place to deal with this is in the credit system debate and the strategic planning conversation as it relates to our communications and plans for Controlled Wood as a long-term input to FSC products.	Remove 3.2.4.

3.2.4	G/T	<p>For the German wood industries it is not acceptable to be discriminated by having this paragraph included.</p> <p>For example the German Parquet Industry Federation (Verband der Deutschen Parkettindustrie e.V. (vdp)), the Veneer Industry Association (Initiative Furnier + Natur e.V. (IFN)) and the German Furniture Industries Federation (Verband der Deutschen Möbelindustrie e.V. (VDM)) which only are some of the organizations under the umbrella of the HDH are effected tremendously by this. Lots of furniture (e.g. private, contract, office, healthcare), flooring, construction products, decorative and many more products will not be able to carry any FSC- label anymore.</p> <p>If this requirement will remain, lots of companies and certificate holders will seriously be thinking about refraining from FSC worldwide, especially in Germany.</p> <p>It is not acceptable to have the following paragraph in this or in other FSC-standards:</p> <p>“For FSC Mix assembled wood products, the visible wood component whose species (e.g. oak or maple) characterizes and gives its name to the product (e.g. “cherry cabinets” made from cherry veneer and MDF; “maple engineered flooring” made of maple wear layers on pine platforms) shall be FSC certified (FSC 100%, FSC Mix or FSC Recycled).</p> <p>NOTE: This requirement does not apply to decorative paper imitating the appearance of wood species.”</p> <p>Furthermore:</p> <ol style="list-style-type: none"> <li>1. This is in contradiction to the inherent basics of FSC goals that is presented at landing page of <a href="https://ic.fsc.org/">https://ic.fsc.org/</a>: Promoting the responsible management of forests worldwide <ul style="list-style-type: none"> <li>o Environmentally Appropriate; Protecting and maintaining natural communities and high conservation value forests.</li> <li>o Socially Beneficial; Respecting the rights of workers, communities and indigenous peoples.</li> <li>o Economically Viable; Building markets, adding best value, and creating equitable access to benefits.</li> </ul> </li> <li>2. In this context it is irreproducible why decorative paper imitating the appearance of wood species are excluded from this requirement since natural products such as wooden veneer shall be promoted to bring SFM and social and economic aspects in all countries of the world to a good level.</li> <li>3. If this requirement will remain, even the exemption of paper will be cancelled, lots of furniture, flooring, decorative and other products will not be able to carry any FSC- label anymore.</li> <li>4. This is obviously discriminating wooden veneer and in contradiction to the social movement that wishes to come back to nature turning away from plastics.</li> <li>5. It is an erroneous believe that this requirement will avoid misleading claims or the misuse of claims.</li> <li>6. FSC should be happy that at least parts of the products are FSC-certified.</li> <li>7. If this requirement will remain, lots of companies and certificate holders will refrain from FSC worldwide.</li> </ol>	Delete completely without substitution
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3.2.4	G	<p>This regulation has to be refused. Motion 43 of the IA 2011 asked for a avoiding misleading claims and communications in relation to FSC Mix products. certificate shall communicate truthfully and transparent about FSC Mix products whose visible and characterizing components are not FSC-certified but are instead Controlled Wood. Motion 43 does not call explicit for certificated wood components whose species characterizes the name of the product.</p>	A new regulation has to be created in order to allow a customer-communication as mentioned in Motion 43. This could be done by terms like “component/wood coming from controlled sources”.
3.2.4	G	<p>The in the draft mentioned restrict regulations will lead to a decreasing quantities of products in the markets. Especially parquet and products with veneer will be affected because of a lack of certified raw-material for the deckings an veneers. Relevant producers will withdraw FSC certified product lines and maybe will go to production of PEFC-Products. Therefore this strict regulation will damage the FSC market and reputation.</p>	

3.2.4	G	<p>For both wood products such as hardwood plywood and engineered wood flooring, there can be multiple species in the face, wear layer, core veneers, and back. A marketing description (oak flooring) does not describe the wood species in that product. In fabricated products where solid wood, engineered veneer products and composite materials (particleboard, MDF, HDF, etc.), the species could likely be a myriad of wood species for a consumer product labeled a “cherry desk” for example. Moreover, the face materials may not even be cherry. Birch and maple are frequently interchanged. Focusing on the “what” gives a product its name pushes FSC into the universe of marketing claims.</p> <p>FSC should stick to its sphere of influence and police the FSC categories and their respective labeling requirements.</p> <p>This proposal forecloses virtually all North American produced face veneer which is not produced in any significant volume as FSC 100% but when combined in products such as VC hardwood plywood or compressed panel cores that are FSC COC, these material are appropriately labeled and marketed under the FSC program. There is no justification given for why this change is necessary.</p> <p>If it’s a marketing effort to grow the FSC program, then the justification given for the change being driven by concern for a consumer expecting FSC cherry cabinets be based solely on the face is completely specious.</p> <p>In the U.S., composite panels such as particleboard and MDF are exempt currently from the Lacey Act because the species, sources, and country of origin are so completely homogenized in a wood soup, they cannot comply with the current Lacey requirements for species identification or COC designation. This proposal removes a large source of supply from North America which the FSC program doesn’t currently reach. Wood veneer which is at the lowest risk for illegality and FSC in North America recognizes.</p> <p>In North America, FSC 100% veneer is not available in commercial quantities if at all. Above all FSC Mix is not an option for decorative veneers. They are a single species. This will put pressure on designers of furniture, doors and panels to look for alternatives to real wood when FSC is specified.</p> <p>A laminated paper product could be allowed to give the name to the product as FSC certified. Under this proposal paper has in practice far more FSC Controlled wood inside as almost all paper is produced as FSC Mix credit. The only difference with wood veneer is that, as a natural wood product and unique species, it cannot be mixed-up in a veneer, but different tree species’ fibers are virtually always a mixture or different species in paper products and attain the FSC Mix status. FSC should for this reason not discriminate against wood veneer which can never be a mix.</p>	<p>“For FSC Mix assembled wood products, the visible wood component whose species (e.g. cherry or maple) characterizes and gives its name to the product (e.g. “cherry cabinets” made from cherry veneer and MDF; “maple engineered flooring” made of maple wear layers on pine platforms) shall be labelled according to the certification status of the component parts: e.g. “Cherry Cabinets made from Cherry Veneer on FSC Mix MDF.” Note: This applies to other component products such as laminated paper products who give the name to the product (e.g. “Cherry-look cabinets made from cherry- printed FSC Mix paper and MDF”, or, if the paper is not FSC certified, “made from cherry-printed paper and FSC Mix MDF”).”</p>
3.2.4	G	<p>If the true intent of Motion 43 was specifically to protect consumer interests: “a consumer would expect that the oak-veneer of an FSC-certified oak-kitchen is FSC-certified.” The reality is the cabinet or furniture is a mix of species, a mix of solid wood, wood veneer, and composite wood products. The reality is a consumer buying an oak desk, unless it’s all solids, ever gets an “oak desk”. Consumer interests are not served by allowing laminates to label paper as hardwood. This is a far more misrepresentation.</p> <p>This proposal elevates paper and laminates masquerading as real wood under FSC to further mislead the consumer in practice. The consumer’s expectation that the oak-look of a desk is actually oak is branded as “it must be oak because the FSC label says it is”. That is a treacherous assumption under the best of circumstances.</p> <p>It’s not the species that matters, but where the products appropriately fits into the FSC scheme of things.</p> <p>The trademark issue is a red herring. It should not be FSC’s intent to “deceive” a consumer in what fabricated product they are purchasing by the FSC label. Both the FSC label and the product need to inform</p>	<p>“For FSC Mix assembled wood products, the visible wood component whose species (e.g. cherry or maple) characterizes and gives its name to the product (e.g. “cherry cabinets” made from cherry veneer and MDF; “maple engineered flooring” made of maple wear layers on pine platforms) shall be labelled according to the certification status of the component parts: e.g. “Cherry Cabinets made from Cherry Veneer on FSC Mix MDF.” Note: This applies to other component products such as laminated paper products who give the name to the product (e.g. “Cherry-look cabinets made from cherry- printed FSC Mix paper and</p>

		the consumer what it is they are actually buying. Mixed species and mixed materials are the norm.	MDF", or, if the paper is not FSC certified, "made from cherry-printed paper and FSC Mix MDF")."
3.2.4	G	Motion 43 of the IA 2011 does not call explicit for "certificated wood components whose species characterizes the name of the product." The proposed regulations will lead to a decreasing quantities of products in the markets. Especially parquet and products with veneer will be affected because of a lack of certified raw-material for the deckings and veneers. Relevant producers will have to withdraw FSC certified products.	
3.2.4	G	This point should be cancelled.	
3.2.4	T	3.2.4 Was drafted to meet the purpose of Motion 43 from the FSC General Assembly 2011. Motion 43 mandates the introduction of a requirement in FSC COC to avoid misleading claims and communications in relation to FSC Mix products where the name-giving species is not certified, but instead is FSC Controlled Wood. The example given in Motion 43 is: A consumer would expect that the oak-veneer of an FSC-certified oak-kitchen is FSC-certified. Especially with products of controversially discussed species (some tropical timber species) it is confusing that the name-giving and visible specie of a product has not necessarily to follow FSC-requirements for this specie. How is "visible" defined? From what viewing perspective must the species be evident? The basis for the FSC Mix Category is to enable the use of various approved input materials that have been verified. and controlled within the FSC system.. The FSC Mix claim is critical to providing FSC certified assembled products to the market. FSC will significantly reduce the number of FSC assembled products, by attempting to manage where individual FSC or FSC CW components are located in an assembled product. Under the FSC Mix definition, it clearly states FSC controlled wood as one of the acceptable material categories.	Recommendation: 3.2.4 Should be revised to: 1. FSC should educate consumers on the FSC mix product claim, manufacturers, may include a general note on sales documents of FSC mix products, indicating that components in the final assembly may include; FSC 100%, FSC Mix, FSC Recycled and FSC Controlled Wood. 2. A more practical approach is for FSC to consider alternative requirements for the use of material made from specific controversial tropical timber species in FSC Products.
3.2.4	G	Since we deal entirely in wood products, and mainly indigenous North American species, the Controlled-Wood claim on those species is vital to the value of our products. There is simply nowhere near enough FSC 100% raw material available to supply the demand of FSC surface material. If Controlled-Wood is eliminated, the demand as a whole for wood products in the construction and furniture industry will perish.	Eliminate this new requirement. And leave the assembled wood products section as it stands in current version.

3.2.4	G	This regulation has to be refused. Motion 43 of the IA 2011 does not call explicit for “certificated wood components whose species characterizes the name of the product.” The proposed regulation will lead to a decreasing quantities of products in the markets. Especially parquet and products with veneer will be affected because of a lack of certified raw-material for the deckings and veneers. Relevant producers will have to withdraw FSC certified products. Therefore this strict regulation will damage the FSC market and reputation.	A new regulation has to be created in order to allow a customer communication as mentioned in Motion 43. This could be done by terms like “component/wood coming from controlled sources”.
3.2.4	G	good clarification to avoid unintentional misleading claims and confusion to the end user	
3.2.4	G	You are eliminating our ability to use FSC controlled wood veneer for furniture as we apply that veneer to certified MDF or PB. FSC 100% or FSC mix veneer is hardly available, and if so, only at a much higher cost. We believe that the difference in treatment between genuine veneer and paper products is not justified and represents a serious threat to all real veneer users.	Do not make proposed change. Or Do not enforce proposed change. Or Add statement as optional
3.2.4	E	Overly detailed and prescriptive.	Rewrite and simplify, then move to appendix/annex
3.2.4	G	As a producer of hardwood and softwood plywood, siding, concrete forming and other over-laid (“mix assembled”) panels, this requirement will significantly impact our ability to sell panels with FSC claims. The use of controlled wood in our panel’s surface veneers and overlays makes it possible to provide FSC certified products to the market competitively. Limited (or non) availability of FSC certified surface components within reasonable sourcing distances will limit, or end, our participation in markets for these FSC certified panels. Also, we do not understand how a “FSC Mix” or “FSC Recycled” surface component becomes acceptable in the solution (“...shall be FSC certified (FSC 100%, FSC Mix or FSC Recycled”) knowing that the actual surface component could still be controlled wood coming out of a credit system claim. We question the measure being taken here to address the concern of “misleading claims”. If FSC mix products are considered misleading at the “visual wood component” level, how are they not considered misleading underneath the visual component? Making special circumstance requirements like this within the framework of the FSC system will lead to more confusion and contradiction in the marketplace.	Drop the requirement or eliminate the FSC mix and FSC recycled claims from the chain of custody standard.
3.2.4 NOTE	G	In this NOTE decorative paper must not be FSC-certified. In the regulation of Part 9 credit system 9.3.4+9.3.5 is the requirement that the melamine paper top layer must be certified. This is a dissent with this regulation.	
3.2.4 NOTE	G	In this NOTE decorative paper must not be FSC-certified. In this context it’s contradictory that “9 Credit system” (9.3.4+9.3.5) includes the demand that melamine paper tops layer must be certified. This is a dissent within this regulation.	
3.2.5	E	Overly detailed and prescriptive.	Rewrite and simplify, then move to appendix/annex
3.2.5	T	Item b) defines that the reclaimed material can be defined as FSC CW It is unclear if this change means that any reclaim material from a process of secondary manufacture in terms of b) , even from a non-certified product could be FSC CW (originally from an ineligible input). Also, if this requirement is applicable to reclaimed paper or wood material	Only reclaimed material from a process of secondary manufacture that produced FSC product can be FSC CW in terms of the item b)



3.2.5	E	This clause is very poorly written and it is very unclear what the requirement actually is. As I read it, organizations which reclaim material at their own site shall classify the material that they reclaim from a process which contains reclaimed material sourced from a third-party as an input to their process e.g. how to classify a reclaimed material derived from a reclaimed material.	
3.2.5	T	The change in terminology from generating input material at its own site to reclaim material on their own site causes confusion with the definitions of reclaimed used elsewhere in this and other FSC standards.	Suggested Revision:  "Organizations that reclaim material from production processes at their own site..."
3.2.5	E	3.2.5 is rather descriptive as under "Definitions"	This section could be added to the "Definition" section instead.
3.2.6	E	Overly detailed and prescriptive.	Rewrite and simplify, then move to appendix/annex
3.2.6		suggest exemplifying	
3.3.1	E	The reference to FSC-ST-40-005, which version ? This document is still in a draft version	
3.3.1 + 3.3.2		These requirements should be available as hyperlink	
3.4.0	G/T	It will be very difficult to leave the decision how to implement the transaction verification to the companies and subject to assessment and approval by the CBs, since the chosen method has to comply with the methods of the suppliers and customers (since otherwise not functional). This will lead to a lot of confusion in practice.	It could be made mandatory to all companies to carry out the material accounting per supplier and per customer in chapter 5.1 and 5.2. During the audit a sample of amounts per supplier and customer could be taken, which could be compared with the audit records of the suppliers and customers (exchange of data between the CBs would be necessary). However, since the audits are carried out at different times during the year, this would be a process which needs to be carried out by the CBs in a separate process and not by the auditor during the audit, since it would delay the audit process.
3.4.1	G	FSC will be aware that there is massive resistance to this clause among certificate holders for reasons that are well documented. From a practical perspective FSC should stop being disingenuous and either drop the clause altogether or force certificate holders to use the OCP and suffer the consequences As an observation, if there really is a major problem with misleading claims, and this seems to be more perception than reality, it is difficult to see how the OCP, or any other "mechanism" will fix it.	Delete 3.4. and put in place measures to target the problem at source. FSC should work with CBs operating in countries such as China to deal directly with offenders.
3.4.1	E	This requirement undermines FSC's credibility being unable to solve a problem within the FSC certification system and transferring this responsibility and burden to the certificate holders. And how will this even be credibly audited? Legally, a CB only has the right to audit a client with whom it has a signed agreement, not its client's suppliers.	Delete.
3.4.1	G	Alternative verification systems must be risk-based. Depending on the risk there should be a 100 % inspection or a small sampling inspection. The risk approach should in particular relate to countries. The criteria could be the corruption index CPI.	

3.4.1	G	The alternative verification systems must be pragmatic and applicable. After OCP was not made mandatory it shouldn't be introduced through the back door, because the alternatives are so complex and complicated that there are de facto no alternatives to OCP. This indirect introduction of OCP will cause a lot of reputation damage for the FSC International. Excessive requirements can lead to a series cessation of FSC certifications.	
3.4.1	T	This section is overly complicated - it is too open ended to fully comment on; and the current note leaves too much in the interpretation of CB's. Whilst it is appreciated that there will be a separate consultation on risk, this is fundamental to addressing 3.4 and must be clarified ASAP and before this standard a 2nd public consultation.	Urgently define risk based approach. Urgently give examples of compliant "mechanisms"..  Suggestion "The organisation shall cooperate with its Certification Body, to allow the organisation's certified material records, to be compared against those of its suppliers and customers certified material records."
3.4.1	G	It's still very unclear what will be expected from a FSC-certified business to meet this standard (outside of using the OCP). I'm not clear how this is going to work with small suppliers or large suppliers of FSC-certified volume. How will this system be able to balance FSC claims input and received if the receiver is downgrading or de-certifying the FSC content. How will this be integrated with log purchases and conversion factors? Will all FM certificate holders also need to participate in a meaningful way?	If not using OCP, this requirement requires purchasers of FSC materials to somehow gain internal records of FSC output claims from suppliers? Not sure how this will work or if. This appears to FORCE FSC users onto OCP. But it's not clear what happens if a purchaser is using the OCP but the seller is not. What then? This needs much more review and work through. This has the potential to cause major catastrophes in the FSC system. I don't have a great solution to this as I question the need to add this level of complexity to FSC implementation. Would prefer it if FSC-IC and national initiatives had a dedicated fund to rooting out fraud in the system – as it appears this is the concern we are trying to address here.
3.4.1	G	The requirements to be met by an alternative Transactional Verification methods are not published/ not completely clear even for FSC at the moment and therefore they are not available for this consultation period. This procedure is not comprehensible enough to comment on it without having the all needed information available.	
3.4.1	G	The requirements for alternative verification systems must be also included in the main/ leading CoC standard - not only in a supplementary document for certificate holders, the CoC accreditation standard for certification bodies (FSC-STD- 20-011 here). The Transaction Verification is one of the main changes of the CoC-standard. Companies must be informed in this CoC standard about new regulations. The regulations about alternative systems of the Transaction Verification have to be part of the second draft of the CoC standard and have to be commented within this CoC standard. There is a risk that only a few companies will give feedback when it is not part of this consultation. Although this is FSC compliant that can cause a loss of reputation for the FSC. With more complicated regulations FSC will loose some of his supporters on the company side.	
3.4.1	G	Alternative verification systems must be risk-based. Depending on the risk there should be a 100 % inspection or a small sampling inspection. The risk approach should in particular relate to countries. The criteria could be the corruption index CPI.	

3.4.1	G	<p>The alternative verification systems must be pragmatic and applicable. After OCP was not made mandatory it shouldn't be introduced through the back door, because the alternatives are so complex and complicated that there are de facto no alternatives to OCP. This indirect introduction of OCP will cause a lot of reputation damage for the FSC International. Excessive requirements can lead to a series cessation of FSC certifications.</p>	
3.4.1	T	<p>Rainforest Alliance understands the need to develop transaction verification measures to protect the system from risk such as 'intentional false claims' and 'claims with errors.' We strongly support this development.</p> <p>To develop an appropriate, effective, realistic solution, Certification Bodies and Certificate Holders must first understand the risks, by reviewing the research that demonstrates the data of the problem. FSC has not yet demonstrated that origination errors are a significant issue in the FSC system. An appropriate method of transaction verification cannot be determined until FSC publishes the research study done on fraudulent claims.</p> <p>Further, Certification Bodies cannot fully provide feedback on a standard requirement such as this, without understanding what the accreditation requirements will be to audit transaction verification systems other than the OCP.</p> <p>The transaction requirements as currently written can cause great burden on certificate holders, forcing organizations to leave the FSC certification system. A streamlines, simplified approach is in great need and would align with the overall FSC strategy.</p>	<p>Recommendation for next steps in the development of Transaction verification mechanisms:</p> <ul style="list-style-type: none"> <li>• Publish the research on the current issues with fraudulent claims and claims with errors.</li> <li>• Release the second draft of the FSC-STD-40-004 V3 with a revised draft of FSC-STD-20-001 that includes accreditation requirements for auditing the new 40-004.</li> <li>• Consider stronger methods of enforcement outside of the audit process to battle the issues of fraudulent claims. FSC has resources to do thorough investigations of claims and supply chains thought to be fraudulent, and has a Policy of Association to enact on the bad players within the FSC system.</li> <li>• The current system is relying heavily on the Certificate Holder and the Certification Body to fix the problem. A holistic approach where FSC, ASI, CBs and CHs are involved in the effort is more effective and more desirable.</li> </ul>
3.4.1	G	<p>The requirements for "other methods" alternative to the OCP are not defined. That would be my comment and actually a very serious concern. We however think that the timing of the revision of this standard comes at a too early time to be able to consider the implementation of Transaction Verification. The results of the study of misuse and false claims is not available yet, so is the extent of the problem. When the extent of the problem is known appropriate measure to address the problem can be decided and implemented. The implementation of this requirement at this stage would be completely illogical. The requirement of transaction verification therefore needs to be postponed to the next revision.</p>	<p>Please delete the entire clause from this draft. And postpone the clause to the next revision.</p>

3.4.1	T	<p>In the transaction verification webinar, risk approach was explained briefly. It is taking into account followings:</p> <ol style="list-style-type: none"> <li>1. CPI of the country of suppliers</li> <li>2. No. of CARs of suppliers</li> <li>3. No. of CARs of the organisation</li> </ol> <p>In order for a CH or a CB to manage properly, the risk level should not alter year by year. It makes things too complicated and many CHs will not be able to implement correctly.</p> <p>So 2 and 3 above should not be included in the risk approach. Particularly 2 should not be included as it is a confidential information currently and many suppliers will not want to make this information open.</p> <p>So risk factors should be considered so that the risk of a supplier stays the same unless if the supplier makes a direct miss leading claim.</p>	<p>Consider followings in the risk approach:</p> <ol style="list-style-type: none"> <li>1. CPI of the country of suppliers.</li> <li>2. Industry of suppliers (if the survey result showed that the risk depends on industries. Otherwise, this factor is not needed).</li> <li>3. In case, if a supplier was found to be making a miss leading claim, intentionally or not, the risk immediately becomes high. In this case, the supplier is responsible for informing all clients of this occurrence in writing within 14 days. Major CAR should be issued by a CB of the supplier to follow the situation so that the deadline for this major CAR should be 14days from the finalisation of the audit report.</li> </ol>
3.4.1	G	<p>The requirements to be met by an alternative transactional verification methods are not published/ not completely clear even for FSC at the moment and therefore they are not available for this consultation period. This procedure is not comprehensible enough to comment on it without having the all needed information available.</p>	
3.4.1	G	<p>The requirements for alternative verification systems must be also included in the main/ leading COC standard - not only in a supplementary document for certificate holders, the COC accreditation standard for certification bodies (FSC-STD- 20-011 here). The Transaction Verification is one of the main changes of the chain of custody requirements. Companies must be disclosed in the applicable CoC standard these regulations. It is required to include the requirements for alternative systems of Transaction Verification into the second draft of the CoC standard and to consult in this framework. There is a risk that only a few companies will give feedback on supplementary documents and that there will be no changes in this standard. Although this is FSC compliant that can cause a loss of reputation.</p>	
3.4.1	G	<p>Alternative verification systems must be risk-based. Depending on the risk there should be a 100 % inspection or a small sampling inspection. The risk approach should in particular relate to countries. The criteria could be the corruption index CPI.</p>	
3.4.1	G	<p>The alternative verification systems must be pragmatic and applicable. After OCP was not made mandatory it shouldn't be introduced through the back door, because the alternatives are so complex and complicated that there are de facto no alternatives to OCP. This indirect introduction of OCP will cause a lot of reputation damage for the FSC International. Excessive requirements can lead to a series cessation of FSC certifications.</p>	
3.4.1	G	<p>Important that the accreditation standard consist of acceptable and relevant demands.</p> <p>Companies must feel that the extra burden makes a difference. That the extra work address and solve a real problem.</p> <p>The risk based approach must be balanced so the extra burden to perform supplier audits is acceptable</p> <p>It is acceptable as long as there is enough flexibility and it does not require huge manual work or implementing costly IT-systems from the certificate holders. The OCP must be only one option instead of a "voluntary must"!</p>	

3.4.1	E,T	We welcome the introduction of a risk based system that allows companies to choose the system best suited to their operations and supply chain risks. We recognize that FSC will consult on a document that provides criteria to audit based on scale, intensity and risk (SIR). However, we do not agree that the outcome of this consultation will be inserted in the accreditation standard FSC-STD-20-001. Instead, the outcome of the consultation should be issued as a guidance document thus still providing an opportunity for organisations to fulfil the requirement in a way best suited to their own operation and supply chain.	New wording for 3.4.1: The organisation shall have a mechanism in place to allow the certification body upon request to check that the organisation's recorded FSC input claims match the recorded certified output claims. This mechanism should be appropriate for the risk level with respect to the geographic area and sector concerned.
3.4.1	G	The requirements to be met by an alternative Transactional Verification methods are not published/ not completely clear even for FSC at the moment and therefore they are not available for this consultation period. This procedure is not comprehensible enough to comment on it without having the all needed information available.	deletion
3.4.1	G	The requirements for alternative verification systems must be also included in the main/leading CoC standard, the CoC accreditation standard for certification bodies (FSC-STD- 20-011 here). The Transaction Verification is one of the main changes of the CoC-standard. Companies must be informed in this CoC standard about new regulations. The regulations about alternative systems of the Transaction Verification have to be part of the second draft of the CoC standard and have to be commented within this CoC standard. There is a risk that only a few companies will give feedback when it is not part of this consultation. Although this is FSC compliant that can cause a loss of reputation for the FSC. With more complicated regulations FSC will loose some of his supporters on the company side.	
3.4.1	G	Alternative verification systems must be risk-based. Depending on the risk there should be a 100 % inspection or a small sampling inspection. The risk approach should in particular relate to countries.	Propose risk based verification system, e.g. based on CPI.
3.4.1	G	The alternative verification systems must be pragmatic and applicable. After OCP was not made mandatory it shouldn't be introduced through the back door, because the alternatives are so complex and complicated that there are de facto no alternatives to OCP. This indirect introduction of OCP will cause a lot of reputation damage for the FSC International. Excessive requirements can lead to a series cessation of FSC certifications.	
3.4.1	T	Since alternative options for transaction verification are still under development it is unclear what this will mean in practice. Thus, as it presently stands, we feel OCP is not on a voluntary basis but is a mandatory for transaction verification. The concerns are about the increase of the administrative burden and cost that OCP or other transaction verification alternative will take to comply with the requirement. This could result in a lot of extra work to manage a transaction verification system for which there still has not been a substantiated proof that there is a problem of misuse of the FSC claims. Further information on how certificate holders will conform to this requirement would be very helpful if provided prior to the next public consultation. Without this information accompanying the new requirement it is nearly impossible for certificate holders and members to effectively comment on or support this requirement, as the impacts on their certification are not well understood. Additionally, as it is likely that many certificate holders will wish to use alternative options other than the OCP, these options need to be clearly defined and requirements clarifying how certificate holders can employ these options.	Specify alternative options and requirements for transaction verification which are compatible with the systems already in place that does not increase the administrative and cost burden to the certificate holders.  Or transfer the burden of transaction verification to the CB during the audit process. It is up to the CB to verify with the supplier's CB that the supplier has accounted for the FSC sale to its customer.

3.4.1	G	<p>Transaction verification as formulated in the draft will not be accepted by many companies due to the following reasons: Without having analysed in which industries and/or regions the identified weaknesses cause risks and problems in practice, it generates additional effort and expense to ALL certified companies (It looks like a general suspicion). FSC has already confirmed that Transaction Verification should be implemented risk-based. But this is not found in the draft.</p> <p>If Transaction Verification should be done risk-based, the criteria for risk assessment must be known. A criterion such as the frequently consulted Corruption Perception Index appears to be inadequate. Rather, an application in case of suspicion should be defined (eg. FSC declaration on the documents by a stamp or FSC-looking statements in deviating from the other text of the document typography). Certification is based on sampling. So it should be with Transaction Verification. The current wording, however, can mean a 100% application.</p> <p>The draft standard clearly specifies that alternative methods to the OCP may be applied. However, no definition is provided which alternative systems or procedures would be acceptable. In extreme cases it could mean that only the OCP meets the criteria. (It is feared the "OCP coming through the back door.")</p> <p>If each certified companies can set up its own verification system, each certified companies will have to deal with multiple systems, because suppliers and customers (and / or their certifier) must be serviced as required. If a system is rejected (eg. the OCP), this may mean not being able to work with a supplier or customer if he does not want to deal with alternative methods beside its own choice.</p> <p>The wording "have a mechanism in place" is not clearly stating, WHO must do the Transaction Verification. When using alternative methods to the OCP it is not explained enough who has to do the job. In general, there seems to be a problem of controllability, which raises the question of whether Transaction Verification is rather an object of the certifier (which are responsible for controls) than for the certified companies (who are responsible for the implementation of the FSC requirements in their companies). It is not sufficiently proofed whether the audit practice cannot be improved without burdening the certified companies. The FSC announced that it would consider other audit procedures ("cross-site auditing"?) and it is unknown whether a better cooperation between the various certification bodies will be sought.</p> <p>It must be made assured that a certified company gets no non-compliance if the supplier has done something wrong ("Everyone is responsible for his own actions, not for the others.").</p>	<p>Put the revision on hold concerning 3.4 Transaction Verification until the potential risk of the weaknesses is analysed and defined for different materials/products, branches/ companies, regions and used internal control systems, so Transaction Verification can be implemented risk-based, alternative methods are defined clearly and in a way that does not solely promotes the OCP, it is clarified that no 100% security can be provided, but controls are based on sampling, the efforts, costs and effect of implementing Transaction Verification it put in a realistic relation to the risk of the identified weaknesses, it is clarified WHO has to do the Transaction Verification and WHEN, it is clarified that companies are not made responsible for the functioning of the COC system of their suppliers.</p> <p>Re-think if Transaction Verification is an issue for the COC standard at all, because the certification bodies are responsible for the control of functioning of the COC systems, not the companies by doing inter-company checks.</p> <p>Improve audit practise:  Allow certification bodies to forward suspicious documents to the certification body of the sender.  Force certification bodies to also check sales documents which (reportedly) do not contain FSC claims.  Force certification bodies to randomly exchange volume reports of connected certified companies.  Implement centralised training for COC auditors.</p> <p>Develop helpful tools to reduce the risk (see proposal for database email subscription above).</p> <p>Let ASI check certified products along the chain of custody (from the finished product back to the forest), instead of or beside controlling single COC companies.</p> <p>Generally simplify the FSC COC standard to lower the risk of unintended mistakes.</p>
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3.4.1	G	There is no clear description of an alternative procedure instead of OCP. We fear that the requirements will be so high, that the use of OCP is the only option. Might this be the implementation of OCP through the back door?!	In order to avoid unjustified increase of administrative costs, we suggest to apply a risk based approach, for instance by using the corruption perception index: Low level of perceived corruption, less intense sampling to check on transaction verification.
3.4.1	G	FSC is still not able to quantify these “inaccurate claims” which are supposed to justify the necessity of “Transaction Verification”. Therefore, the procedure remains disproportionate and, above all, the OCP is fraught with many risks for the participating companies. Therefore, the least FSC can do is to offer alternative methods to the OCP during this discussion. However, the requirements to be met by an alternative transactional verification method have not as yet been published. As a result, they are not available for this consultation period. Hence, this new procedure is not sufficiently transparent to comment on.	Delete 3.4
3.4.1	G	The requirements for alternative verification systems must be included in the main CoC standard – neither in a “note for stakeholders” nor in a supplementary document (here: FSC-STD-20-011). Additionally, FSC-STD-20-011 will be revised following the termination of the current consultation period. To introduce OCP “through the back door” would damage FSC’s reputation enormously.	As soon as FSC can give plausible reasons for the necessity of “Transaction Verification” by presenting the extent of “inaccurate claims”: include the requirements for alternative systems of “Transaction Verification” into the next draft of the CoC standard in a transparent manner, thus making them available for everybody to comment on.
3.4.1	T	A lot is changing with the introduction of V3. FSC has not provided significant branding or product value to participating businesses. In the interest of keeping it simple and avoiding unnecessary burdens that will lead to attrition of certified companies we need to apply transaction verification very carefully.	Require the use of online claims platform in areas found high risk by the study being performed on origination errors. Consider requiring little to no change to companies in regions with low origination error risk. Create a procedure to ensure low risk areas are monitored and adjusted based on evidence of unacceptable levels of error. Monitoring of origination errors can be done by ASI during CB audits, on a small proportion of overall businesses reviewed. Requiring the collection of supplier documents for 50% or up to 20 supplier records, with at least 1 record from each FSC supplier. I am open to other language/solutions being used in place of this example solution for monitoring low risk origination error areas.
3.4.1	G	Up to now the requirements of an alternative transactional verification are not known. Therefore it is not possible to comment on this very important issue.	

3.4.1	G	The requirements for alternative verification systems must be also included in the main/ leading COC standard - not only in a supplementary document for certificate holders – as the Transaction Verification is one of the most important changes of of the chain of custody requirements. Companies must be disclosed in the applicable CoC standard these regulations. It is mandatory, to have this requirements for alternative systems included in the next coming draft of the CoC standard. In this next draft the requirements have to be consulted.	
3.4.1	G	Depending on a risk based view the alternative system should have regulations from a small sampling inspection up to a 100 % inspection. The risk approach should in particular relate to countries.The criteria could be the corruption index CPI.	
3.4.1		The alternative verification systems must be pragmatic and applicable. After OCP was not made mandatory it shouldn't be introduced through the back door. Excessive requirements can lead to a series cessation of FSC certifications.	
3.4.1	G	Transaction verification systems are not defined at all (except OCP). This procedure is not comprehensible enough to comment on it. More information is necessary to provide consultation. Nevertheless, we want to stress that it is imperative to include the detailed requirements on transaction verification in the main COC Standard before releasing! This is a major change to the system as a whole, and therefore a separate document is not acceptable and may cause loss of reputation for FSC. In addition, there is a need to build up a risk based transaction verification system! It is of great importance to give CH an alternative to OCP, that allows them to continue work with their existing systems.	
3.4.1	G	So far no hard evidence has been delivered by FSC international on the magnitude of the problem concerning transaction verification. Therefore the necessity for an Online Claims Platform nor similar actions for transaction verification as stated in this clause are to be proposed. - Securing a credible Chain-of-Custody system through procedures and auditing is the core responsibility of FSC and should not be transferred to certificate holders, nor by using a OCP nor by any other system. - This clause offers an alternative to an online OCP which has been strongly opposed to by FSC certificate holders and representatives from the timber trade and industry. Certificate holders however lack every (legal) means to get access to the administration of suppliers in respect to transaction verification and therefore are placed in an impossible position by this clause. - This clause results once again in an extra workload for certificate holders as each and every transaction needs to be verified, with suppliers as well as with clients. Even if FSC supplies a framework for risk analyses the extra workload is substantial. Some certificate holders process more than 80.000 transactions yearly!	Delete completely.
3.4.1	E	This requirement undermines FSC's credibility being unable to solve a problem within the FSC certification system and transferring this responsibility and burden to the certificate holders. And how will this even be credibly audited? Legally, a CB only has the right to audit a client with whom it has a signed agreement, not its client's suppliers.	Delete.



3.4.1	G	<p>I hope that feedback in relation to section 4 of the proposed v3 of the CoC standard can be carefully considered, and not rejected as being from a source that is hostile to the FSC.</p> <p>My credentials for making these comments are as follows: I have been involved with FSC since the beginning in the UK. I was on the committee that commissioned and chose the FSC trademark. I am an auditor of more than 18 years experience, since the very early days of FSC. I have followed the evolution of the FSC since then, and I have actively campaigned for its uptake, particularly in the public sector. I have knowledge of CoC certification in UK, Eastern Europe, the Gulf, and India and have conducted over 700 Chain of Custody audits.</p> <p>The FSC is amending its CoC standard v2 on the premise that there is a serious flaw in their system, which is perceived as failing to pick up false origination of material entering the system. I believe this premise is false. I have seen nothing in many years, hundreds of audits that would lead me to believe that there is a serious corruption of the system caused by massive false origination. Here and there I encountered minor origination faults, but they were inevitably of the nature of an erroneous product category (i.e. the least serious kind of origination failure, involving a mis-identification of the material category of the FSC certified product) being used by a supplier. If I am wrong, and indeed there is a serious undermining of the FSC system, can this not be dealt with on a regional basis? - ie. possibly in China or the Far East . False origination can and should readily be picked up by auditors in these areas. Does the FSC doubt that its own CB's are too naive to administer the system?</p> <p>I am also concerned about the way in which section 4 of version 3 appears to require a certified company to 'distrust' its supplier. The distrust is implicit in the wording of the proposed change, virtually as an requirement of the certified company to audit the books of its suppliers. The signal is then given to certified companies that the FSC audit process itself is not trustworthy so far as their suppliers are concerned, even though those companies are themselves FSC certified. Reading between the lines, the FSC is piling on the pressure upon companies at this point in order to ensure uptake of the OCP system. It seems as though, having discovered that there is enormous actual and potential resistance to OCP amongst the FSC certificate holder base, the FSC is trying a back door tactic, by virtually requiring the use of OCP when v3 of the COC standard becomes mandatory.</p> <p>As the pressure to ensure these distrustful approaches becomes fed into the system when v3 is introduced, the burden will fall upon auditors to ensure that the new standard is met. There will be not only great resistance among the customer base of FSC (who appear largely naive about OCP at the moment), but there will be huge pressure on auditors, dealing with ever more unhappy FSC certificate holders. Personally, I am glad not to be part of this any more, as I have decided no longer can I intellectually or morally support the changes within the FSC Chain of Custody system that are required under v3 of the standard. I believe these changes are misguided, unrealistic and un-necessary. The requirements of section 4 of v3 of the proposed FSC Chain of Custody standard are iniquitous and the OCP is a very bad idea indeed.</p>	
3.4.1	G	<p>Most of the proposed changes sounds good to me; simple is beautiful. But, there is one matter, which not ok at all. The planned OCP-system to verify transactions is not a good idea. You are asking companies to put sensitive information into a platform, which is surely a target for Asian hackers to get business intelligence information from member companies. I don't believe, that the platform protection will last against aggressive attacks. There should be another safe way to handle and follow transactions</p>	

3.4.1	T	<p>We reject this clause. The criteria to assess such systems need to be included in FSC-STD-40-004 and not in standards that are not relevant directly to certificate holders. Our perspective is that such criteria need to be included in the next draft of FSC-STD-40-004.</p> <p>Transactions verification involves the high risk that administrative costs increase and that FSC business might be reduced to only specifically ordered volumes and that material on stock will not be switched to FSC. Finally the actual demand for certified products is low. And if the processes of companies are burdened, than the potential of higher offer of certified material will be reduced.</p>	
3.4.1		<p>An integrated system would be another step in our process not to mention the IT costs of implementing and training, assuming that each supplier would be on board. I understand that FSC would like to be able to monitor and audit all FSC transactions; however, for the companies that abides by the rules and follows the process, it is extra and unnecessary costs.</p>	<p>Have the supplier's certifying body provide specific details to us that we must prepare for our certifying body and vice versa so that the auditors can do the double checking at the time of the audit. Just a thought.</p>
3.4.1	E	<p>This requirement undermines FSC's credibility being unable to solve a problem within the FSC certification system and transferring this responsibility and burden to the certificate holders. And how will this even be credibly audited? Legally, a CB only has the right to audit a client with whom it has a signed agreement, not its client's suppliers.</p>	<p>Delete.</p>
3.4.1		<p>Transaction Verification: This section of the standard is very unclear, and appears to be a continuation of the FSC OCP under a different name. In the development of the FSC OCP, FSC International has stated that implementation of this platform is being driven by false claims in the marketplace, though there has been a lack of information on the part of FSC to support this claim. The OCP process, as proposed, would impose significant costs on certificate holders in an attempt to prevent these alleged false claims. The required documentation within OCP represents a significant increase in data input, requiring significantly more administrative resources throughout the supply chain than the current system. In essence, the costs to certificate holders appear to outweigh the intended benefits of the platform change.</p> <p>There are also concerns around the potential for unintended release or access to sensitive or proprietary information if access is granted to records.</p>	<p>FSC should continue to work with stakeholders that have been active in discussions around the OCP to determine an appropriate path forward.</p>
3.4.1	T	<p>The current wording stipulates that certified organizations will need to have access to the records of sales with FSC Claims of their suppliers, as much as their supplies to the organization are concerned. Guidance for CBs and auditors will be needed to apply a levelled understanding of what constitutes an "accurate method". This guidance should contain information on preparation, audit and documentation requirements and consider the auditability of the requirement in general but especially for small organizations which do not apply sophisticated IT-systems to link to their suppliers IT.</p>	<p>3.4.1 should be more specific in terms of who it is to perform the verification. The organization in an ongoing way vs. auditors once a year?</p>
3.4.1	G	<p>The requirements to be met by an alternative Transactional Verification methods are not published/ not completely clear even for FSC at the moment and therefore they are not available for this consultation period. This procedure is not comprehensible enough to comment on it without having the all needed information available.</p>	

3.4.1	G	<p>The requirements for alternative verification systems must be also included in the main/ leading CoC standard - not only in a supplementary document for certificate holders, the CoC accreditation standard for certification bodies (FSC-STD- 20-011 here). The Transaction Verification is one of the main changes of the CoC-standard. Companies must be informed in this CoC standard about new regulations. The regulations about alternative systems of the Transaction Verification have to be part of the second draft of the CoC standard and have to be commented within this CoC standard. There is a risk that only a few companies will give feedback when it is not part of this consultation. Although this is FSC compliant that can cause a loss of reputation for the FSC. With more complicated regulations FSC will loose some of his supporters on the company side.</p> <p>We suggest to simplify the different standards an Advices to less documents</p>	
3.4.1	G	<p>The alternative verification systems must be pragmatic and applicable. It is not appropriate to collect data from all transportations of FSC material. The OCP is a way of too much data risk and effort for middle size company. Keep it as it is.</p>	
3.4.1	G	<p>Transitioning from an audited risk based system to an undefined transaction verification for every individual transaction is overly burdensome on resources for each stakeholder in the supply chain. Our concern is that it will severely limit the private land owner, logger, and state owned forests and they will not do this.</p> <p>The method outside of the OCP is not defined and left to interpretation of the CB. This will lead to much confusion in the channel as to specific requirements. Introduces ambiguity into the system.</p>	
3.4.1	T	<p>The transaction verification process as proposed (either via on-line claims or alternative methods) would add a unique “FSC processing” layer to company business systems – adding additional cost and resources - with no added value to the certificate holder, their suppliers, or customers.</p> <p>FSC purchases and sales should continue to use the already-existing transactional framework of certified organizations to document and advance chain of custody.</p> <p>The audit process already established by FSC and carried out by the certification bodies is designed to identify origination errors.</p>	<p>Eliminate this requirement Or Make this an optional requirement</p>
3.4.1	G/T	<p>Transaction verification</p> <p>It is not acceptable to have the following paragraph in this or in other FSC standards: 3.4.1</p> <p>This requirement is against the legal protection of data privacy. This is neither just and reasonable nor feasible. This paragraph obviously is a back door for FSC-OCP.</p> <p>The quoted argumentation to prevent originating errors is pleaded. Selling without valid FSC-certificates is impossible as there is an information if certificates are suspended. Terminated certificates become obvious by checking the expiration date.</p> <p>Generally presuming a totally “blacksheep”-trade without trust and honour is hard to believe and makes companies rethink the decision for FSC.</p>	<p>Delete completely without substitution.</p>
3.4.1	G	<p>The requirements to be met by an alternative Transactional Verification methods are not published/ not completely clear even for FSC at the moment and therefore they are not available for this consultation period. This procedure is not comprehensible enough to comment on it without having the all needed information available.</p>	

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3.4.1	G	Alternative verification systems must be risk-based. Depending on the risk there should be a 100 % inspection or a small sampling inspection. The risk approach should in particular relate to countries. The criteria could be the corruption index CPI.	
3.4.1	G	The alternative verification systems must be pragmatic and applicable. After OCP was not made mandatory it shouldn't be introduced through the back door, because the alternatives are so complex and complicated that there are de facto no alternatives to OCP. This indirect introduction of OCP will cause a lot of reputation damage for the FSC International. Excessive requirements can lead to a series cessation of FSC certifications.	
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3.4.1	G	3.4 Transaction verification Alternative verification systems must be risk-based. Depending on the risk there should be a 100 % inspection or a small sampling inspection. The risk approach should in particular relate to countries. The criteria could be the corruption index CPI.	
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3.4.1	G	<p>The transaction verification could be viewed as reasonable for FSC 'projects' such as building construction but has potential to be quite burdensome to large volume manufacturers where orders / receipts are daily activities. The flow of material is dynamic and we rely on the audit system in place today by FSC and their CB to assure the suppliers are following the appropriate procedures to provide material as specified. Our annual audit confirms that we have purchased the appropriate claim-contributing inputs and it is equal to or greater than our claimed outputs. Our suppliers go through this same audit process.</p> <p>An additional inspection/check step appears to be an unnecessary burden and could conceivably drive costs up with duplicated administrative waste. BIFMA members process thousands of purchase orders associated to FSC certification. Additional personnel would be required if the expectations for activities/documentation increases.</p> <p>This activity will not add value to our end consumer and we will therefore not be able to recoup the cost. There are no incentives for the end users that are not COC certified to close the loop on the sales transactions. If they do not, then the final seller (COC certified) will show only increase FSC inventory from their purchases and nothing from the deduction side of the equation.</p> <p>There is a very high level of confidence that the current system of transactions from the buyer to the seller are very accurate, this is based upon the current annual auditing requirements and quality process controls.</p> <p>It cannot be expected to have 100% accuracy between customer and supplier. Even within automated systems there are discrepancies of volumes due to difference in conversion factors, difference in accounting for material in transit, etc. Set a percentage of acceptable variation between supplier and customer. The variation needs to be stated explicitly so audits are consistent.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Eliminate this requirement.</p> <p>Or</p> <p>Eliminate the existing audit/annual reporting and tracking process.</p> <p>Or</p> <p>Increase the reporting responsibility on upstream originators and not downstream fabricators.</p> <p>Or</p> <p>If implemented as described, allow for a transaction discrepancy % between supplier and customer.</p>
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3.4.1	G	<p>The transaction verification could be viewed as reasonable for FSC 'projects' such as building construction but has potential to be quite burdensome to large volume manufacturers where orders / receipts are daily activities. The flow of material is dynamic and we rely on the audit system in place today by FSC and their CB to assure the suppliers are following the appropriate procedures to provide material as specified. Our annual audit confirms that we have purchased the appropriate claim-contributing inputs and it is equal to or greater than our claimed outputs. Our suppliers go through this same audit process.</p> <p>An additional inspection/check step appears to be an unnecessary burden and could conceivably drive costs up with duplicated administrative waste. BIFMA members process thousands of purchase orders associated to FSC certification. Additional personnel would be required if the expectations for activities/documentation increases.</p> <p>This activity will not add value to our end consumer and we will therefore not be able to recoup the cost. There are no incentives for the end users that are not COC certified to close the loop on the sales transactions. If they do not, then the final seller (COC certified) will show only increase FSC inventory from their purchases and nothing from the deduction side of the equation.</p> <p>There is a very high level of confidence that the current system of transactions from the buyer to the seller are very accurate, this is based upon the current annual auditing requirements and quality process controls.</p> <p>It cannot be expected to have 100% accuracy between customer and supplier. Even within automated systems there are discrepancies of volumes due to difference in conversion factors, difference in accounting for material in transit, etc. Set a percentage of acceptable variation between supplier and customer. The variation needs to be stated explicitly so audits are consistent.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Eliminate this requirement.</p> <p>Or</p> <p>Eliminate the existing audit/annual reporting and tracking process.</p> <p>Or</p> <p>Increase the reporting responsibility on upstream originators and not downstream fabricators.</p> <p>Or</p> <p>If implemented as described, allow for a transaction discrepancy % between supplier and customer.</p>
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3.4.1	G	<p>The transaction verification could be viewed as reasonable for FSC 'projects' such as building construction but has potential to be quite burdensome to large volume manufacturers where orders / receipts are daily activities. The flow of material is dynamic and we rely on the audit system in place today by FSC and their CB to assure the suppliers are following the appropriate procedures to provide material as specified. Our annual audit confirms that we have purchased the appropriate claim-contributing inputs and it is equal to or greater than our claimed outputs. Our suppliers go through this same audit process.</p> <p>An additional inspection/check step appears to be an unnecessary burden and could conceivably drive costs up with duplicated administrative waste. BIFMA members process thousands of purchase orders associated to FSC certification. Additional personnel would be required if the expectations for activities/documentation increases.</p> <p>This activity will not add value to our end consumer and we will therefore not be able to recoup the cost. There are no incentives for the end users that are not COC certified to close the loop on the sales transactions. If they do not, then the final seller (COC certified) will show only increase FSC inventory from their purchases and nothing from the deduction side of the equation.</p> <p>There is a very high level of confidence that the current system of transactions from the buyer to the seller are very accurate, this is based upon the current annual auditing requirements and quality process controls.</p> <p>It cannot be expected to have 100% accuracy between customer and supplier. Even within automated systems there are discrepancies of volumes due to difference in conversion factors, difference in accounting for material in transit, etc. Set a percentage of acceptable variation between supplier and customer. The variation needs to be stated explicitly so audits are consistent.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Eliminate this requirement.</p> <p>Or</p> <p>Eliminate the existing audit/annual reporting and tracking process.</p> <p>Or</p> <p>Increase the reporting responsibility on upstream originators and not downstream fabricators.</p> <p>Or</p> <p>If implemented as described, allow for a transaction discrepancy % between supplier and customer.</p>
3.4.1	G	<p>The OCP Webinar had so many unanswered questions and inability to detail on risks.</p> <p>This may drive many customers away from FSC</p>	
3.4.1	T	<p>Extremely harmful requirement. The authors of this clause do not understand the problem they are trying to solve. There is no statistically meaningful evidence or research showing the "origination errors" occur on a Global scale. Currently this requirement has no connection to reality and represents the greatest threat to FSC trust and credibility.</p>	<p>Remove this clause unless you find some statistical evidence backing it up.</p>
3.4.1	T	<p>This is a recycling of the OCP issue which was re-evaluated as voluntary. Now it's a no choice, either OCP or your own version which = same problem.</p> <p>The optional alternative is just OCP in disguise, and many CHs simply cannot incorporate either choices, furthermore there is a real cost in the exercise which should be the responsibility of FSC not the CHs.</p> <p>Furthermore – in the Stakeholder Notes, it's suggested that CB's should audit the 'chosen method'</p>	<p>This needs to be removed. FSC are fully aware of the hostility to this process due to the lack of staff in many cases, &amp; since FSC have no real indication of the variation in actual certified material in the market, this will still not solve the problem. If FSC insist on pushing this further, then firstly as it is self- validation, CHs should only need auditing every two years, and secondly, more clients will cancel their certification.</p>



			Leaving the decision of auditing on such a specific issue to the CB's is a recipe for disaster and variable assessment, so this should be removed completely
3.4.1	G	Transaction Verification: The OCP process is dead on arrival. The cost and burden of the proposed system significantly outweighs any intended benefits.	FSC should rely on the third-party certification bodies to measure compliance with product claims and procedures.
3.4.1	G		
3.4.1	G	Based on the version of QA on this revision I have, what you propose as an "alternative" for the OCP is a manual, flimsy, unpractical version of the OCP... There must be some rational reason for FSC having suspended the implementation of an expensive tool (OCP). If you have proved unable to enforce a solid, user-friendly tool (OCP) among CH, what leads you to believe that a primitive version of the same thing will be a credible option? Also, how will this even be credibly audited? Legally, a CB only has the right to audit a client with whom it has a signed agreement, not its client's suppliers. Please don't forget that the credibility of what you propose is crucial.	Implement the OCP or let it drop. Resist the temptation of "OCP in sheep's clothing".
3.4.1		3.4.1 + Note CEPI welcomes the intention of FSC to strengthen the FSC system by addressing the issue of origination errors by setting criteria and leaving their implementation to companies using appropriate systems and proportionate to the risk rather than prescribing a one-size-fits all system. However, this should be described in clause 3.4 rather than in a note. Also, CEPI welcomes the introduction of a risk based system that allows companies to choose the system best suited to their operations and supply chain risks. CEPI recognizes that FSC will consult on a document that provides criteria to audit based on risk, scale and intensity. However, we do not agree that the outcome of this consultation will be inserted in the accreditation standard FSC-STD-20-001 but rather the outcome of the consultation should be issued as a guidance document thus still providing an opportunity for organisations to fulfil the requirement in a way best suited to their own operation and supply chain.	New wording for 3.4.1: The organisation shall have a mechanism in place to allow the certification body upon request that the organisation's recorded FSC input claims match the recorded certified output claims. This mechanism should be appropriate for the risk level with respect to the geographic area and sector concerned.

3.4.1	G	<p>OCP in disguise... In principle, verifying that input/output between suppliers/customers is worthwhile to increase credibility, The certification bodies should be allowed to verify whether the input/output claims are correct. Commercial relations between suppliers and customers, put neither in a position to request data on the sales of supplier or check what their customers sell as FSC. Business confidentiality of a companies' suppliers and customers steps into an area that will be difficult to penetrate.</p> <p>That said, we realize cheating is an issue in FSC. We need FSC to actively pursue cheaters in the court system where issues are identified.</p> <p>Also suggest requiring all CH to provide annual (calendar year) annual volume summaries to CBs and some blind reporting in aggregate on CB client activity by country.</p> <p>With better cubic meter conversion rationales from round wood, together with simpler species in, species out type requirement we can focus on the FSC Mix or 100% material through conversion.</p> <p>Also, the standard could be built out to include appropriate accounting system audit activity (sampling all invoice information, not just FSC activity) to detect fraudulent invoicing.</p>	<p>We are not in a position to comment on this standard until we understand from our CB how we will be audited against it. Propose that this obligation is taken out until a good system is in place to address systemic cheating which should be transparently and openly discussed, not tucked away in the shadows.</p> <p>Need to focus on rule of law, accounting rules and commercial code of conduct.</p> <p>FSC cannot be the police...at some point the laws we have in place must be relied upon.</p>
3.4.1	G	The requirements to be met by an alternative Transactional Verification methods are not published/ not completely clear even for FSC at the moment and therefore they are not available for this consultation period. This procedure is not comprehensible enough to comment on it without having the all needed information available.	
3.4.1	G	The requirements for alternative verification systems must be also included in the main/ leading CoC standard - not only in a supplementary document for certificate holders, the CoC accreditation standard for certification bodies (FSC-STD- 20-011 here). The Transaction Verification is one of the main changes of the CoC-standard. Companies must be informed in this CoC standard about new regulations. The regulations about alternative systems of the Transaction Verification have to be part of the second draft of the CoC standard and have to be commented within this CoC standard. There is a risk that only a few companies will give feedback when it is not part of this consultation. Although this is FSC compliant that can cause a loss of reputation for the FSC. With more complicated regulations FSC will loose some of his supporters on the company side.	
3.4.1	T	What is an "output claim" - is it simply an invoice?	Request for clarification.
3.4.1	T	Clarification of mechanism	Replace mechanism with system.
3.4.1	T	The OCP is not easily approachable and/or convenient for some companies (e.g. small companies). With the OCP or with another system, we are afraid that certain suppliers won't be eager to share the requested information in particular because it generates more paperwork.	
3.4.1	T	Although the principle of verifying that input/output between clients corresponds is good to increase credibility, we propose that the certification bodies are allowed to verify from our clients and from our suppliers whether the input/output claims are correct. As a client, we are not in a position to request data on the sales of supplier or able to check what our clients sell as FSC.	<p>The only alternative is that certification bodies check the input and output between suppliers and clients.</p> <p>As the OCP is very risky in terms of confidentiality, we propose that this obligation is taken out until a good system is in place or CB's should exchange data.</p>

3.4.1		<p>The organization shall have a mechanism in place to allow the verification that the organization's recorded FSC input claims match the recorded FSC certified output claims of its suppliers.</p>	<p>In the standard itself criteria for alternative verification systems should not be further outlined. Instead, they should be included in another standard for certification bodies. This is unacceptable! These important rules must obviously be part of the main standard. Otherwise, companies can not sufficiently assess what is needed to meet all requirements. Also rejected should be the approach to comment on the requirements within a different context and frame. As well it is unacceptable that the criteria are already discussed in other forums (e.g. website of the OCP) which not very likely meet the same high demands of a real FSC stakeholder process! Clause 3.4.1 is therefore to be rejected in this form. The criteria of transaction verification criteria must immediately be included into the standard itself in order to put it for further discussion within the following draft version.</p>
3.4.1		<p>The OCP, as currently operating, is not possible. The standard states that alternate methods of transaction verification are acceptable, but does not state what they are. This is supposed to be released in a separate standard later this summer. We cannot agree to a system that is undefined. This is the single biggest threat to the entire system and is very poorly defined. It has the potential to cripple the supply side. This will impact every transaction from the harvest site to finished product. The workload will be significant for small business and will not add value. This must be suspended until a functional system is in place to deal with it. CBs also have concerns with this being so poorly defined that they do not know how to audit it. This will result in inconsistent implementation of the standard. It is important to note that given the complexity of supply and distribution chains nearly everyone that remains certified will be forced to use the alternate system in some manner. It is critical that this is fully developed before it is a requirement.</p>	
3.4.1	G	<p>Verification that recorded input claims can be matched against recorded output claims of suppliers should be based on the Global Risk Register.</p> <p>There is a strong case to show that in "low risk" countries in Western Europe such as the United Kingdom, the chance of origination errors is extremely low because of existing due diligence and control methods (for example EUTR, UKWAS). Therefore the OCP will be of little or no benefit.</p> <p>The proposal herewith is that</p> <ol style="list-style-type: none"> <li>1. Low Risk: Verification can be demonstrated using an invoice or self bill invoice, by clearly showing clearly the correct FSC claim (for example FSC MP 70%) against the delivery volume. This is a clear auditable process and can easily be verified against the output claim of a supplier.</li> <li>2. All Other Risk Categories: To use the methods suggested in 3.4 such as the OCP.</li> </ol>	<p>Please change the standard as per my comments to allow for Risk based Verification methods.</p>

3.4.1	T	<p>We are happy to see that the compulsory introduction of OCP was withdrawn. But now we see in the draft that alternative systems to verify transactions are obligatory. We are concerned that the same or similar critical information as in the case of OCP are required to be provided by companies. Additionally we might see an even higher level of administration costs. A discussion why this is needed and important should take place.</p> <p>Therefore we don't understand why the requirements for transaction verification systems are to be described in a separate normative document. All approaches around transaction verification need to be stipulated in the COC-standard, openly and consulted. This should be considered in the next draft.</p>	
3.4.1	E	<p>The proposed Transaction Verification (TV) requirements represent a major and ill-considered change in the fundamental organization of CoC. Please see here for additional rational and commentary: <a href="http://mxwood.com/revisiting-myth-gap/">http://mxwood.com/revisiting-myth-gap/</a></p>	<p>I recommend abandoning both TV and the OCP.</p> <p>Alternative approaches to improving credibility and strength of the system include, a) simplification of the 40-004 (see below), and b) risk-based criteria in the 20-011.</p>
3.4.1		<p>It is not clear what "other automated systems" are. It looks like a dressed up OCP</p>	
3.4.1	G	<p>As the instructions for complying with this new criterion are still under development, it is impossible to comment on it at this time. In some cases, the Terms &amp; Conditions companies are required to agree to in order test the OCP are unworkable for some North American companies and so we cannot test it and provide feedback.</p> <p>Further, we have concerns about the amount of work this will take for certificate holders to comply with the requirement, which may increase the costs of managing an FSC certificate. Small companies and producers may especially be at risk as it seems as though this would substantially increase the amount of administrative burden and cost on small certificate holders. Similarly, there are a number of companies in the FSC system who do not have access to the internet, and this could result in a lot of extra work for group managers if they have to manage a transaction verification system for their members.</p>	<p>The PSU must provide further information on how certificate holders will conform with this requirement prior to the next public consultation. Without this information accompanying the new requirement it is nearly impossible for certificate holders and members to effectively comment on or support this requirement, as the impacts on their certification are not well understood. Additionally, as it is likely that many certificate holders will wish to use alternative options other than the OCP, these options need to be clearly defined and requirements clarifying how certificate holders can employ these options.</p>
3.4.1	T	<p>Basis and Requirement criteria of alternative methods to OCP should be provided as suggestions to the consultation. Without basis and suggestion of requirement criteria the consultation of chapter 3.4.1 should be suspended.</p> <p>The whole procedure will cause additional effort and costs to manufacturers and suppliers, so that manufacturers may search for alternative certification systems such as PEFC and may leave FSC.</p> <p>The amount of input material and its relation to the output material may be business basis and therefore business secrets, which are only shared with the certifying body and not with the public.</p> <p>OCP and alternative methods shall be in accordance to national data protection laws.</p>	

3.4.1	G	<p>Evergreen Packaging strongly discourages FSC from implementing this new requirement. We have numerous suppliers of FSC certified material and also sell FSC certified material to numerous customers. In the proposed COC language, there is no consistent mechanism for verifying claims from suppliers, other than the suggestion to use the OCP. Therefore, the potential exists for numerous different methods for verifying claims to be used by our customers and with our suppliers. It would not be clear until an audit if any of the mechanisms would be approved by a certifying body. Evergreen also believes that requiring companies to have access to supplier information could result issues related to confidential business information (e.g. sales and volume to other organizations that may be in a supplier's claim tracking system). Further, FSC should realize that many certificate holders hold chain of custody certificates under other programs and have already established tracking processes and programs that separately track credits under different certifications under the same mechanism. This change would add undue burden on many certificate holders to operate FSC chain of custody tracking via a completely separate process.</p> <p>FSC should address this issue through a risk-based approach and use other mechanisms such as increased audit sampling of material transaction claims or other approaches to minimize this risk. The proposed approach will result in undue burden, fractured verification systems, and conformance uncertainty.</p>	
3.4.1	T	<p>This is not the responsibility of the organisation, the responsibility of the certificate holder starts with the input of FSC materials, not before. It will not be possible to control the FSC output of all suppliers</p>	<p>This should be the responsibility of the Certification Body, they are the only party in the chain in the position to do this</p>
3.4.1	G	<p>There is insufficient information about what "mechanism" would be acceptable, and the administrative burden associated with this process. For commodity products the OCP makes sense and may work well. For Architectural Woodworkers, each work order is unique and is not as easily handled as many of the raw material (panel, veneer, lumber) inputs.</p>	
3.4.1	G	<p>This point is worded in very general and vague terms. The OCP platform can be used, but alternatives can be used instead. What are these alternatives? What criteria are the alternative audit methods supposed to fulfil? How frequently must audits be carried out? Are comprehensive audits required or are random samples sufficient? Would this lead to a supplier audit in extreme cases? Is the supplier then obliged to provide access to his business documents? Would it be sufficient to send a list of the FSC products received to the supplier at the end of the financial year and the supplier confirms that the list is accurate or corrects it on the basis of his documents? Etc.</p> <p>The certification authorities and not the customers are responsible for auditing correct financial accounting. As far as I can see, there is a shift in responsibility here.</p> <p>It also seems to me that the intention of this section is to create an opening for the controversial OCP platform. Because if the certification authorities do not acknowledge that the alternatives – particularly the manual methods – are appropriate, all that is left is the OCP.</p> <p>Just as dubious is the fact that the risk criteria (FSC-STD-20-011) are only supposed to be developed in 2015, i.e. probably after the second round of consultation for CoC certification has been completed.</p> <p>Irrespective of whether OCP or alternative automated IT systems are involved – it is not possible for small companies to afford the additional financial expense.</p>	<p>Delete this point from the draft, until the criteria have been outlined in detail and it is possible to reach the required goal with minimal additional expense.</p>

3.4.1	E, T	We welcome the introduction of a risk based system that allows companies to choose the system best suited to their operations and supply chain risks. We recognize that FSC will consult on a document that provides criteria to audit based on scale, intensity and risk (SIR). However, we do not agree that the outcome of this consultation will be inserted in the accreditation standard FSC-STD-20-001. Instead, the outcome of the consultation should be issued as a guidance document thus still providing an opportunity for organisations to fulfil the requirement in a way best suited to their own operation and supply chain.	New wording The organisation shall have a mechanism in place to allow the certification body upon request to check that the organisation's recorded FSC input claims match the recorded certified output claims. This mechanism should be appropriate for the risk level with respect to the geographic area and sector concerned.
3.4.1	G	We do not believe that this requirement sufficiently satisfies the need for volume control in the FSC system. Merely requiring a mechanism (which may take very many forms) is an invitation to circumvent the entire idea of volume control. We strongly believe it's fundamental for the credibility of the FSC system that the OCP system is made mandatory for all CoC certified operations.	
3.4.1		The legal documents (invoices) should be used and invoices are a legal proof of a purchase and a claim. In order to exclude fraud it could be researched how to connect incorrect invoices with the accountant and tax control of a company. If a company gets a legal penalty if wrong invoice/ fraud is identified, companies will not 'just write an invoice' anymore. In my opinion the OCP has many options and many positive solutions for small things and of course the information would be 'handy', but is not solving the main problem. The 'good' should not pay for the 'bad'.	Take away 3.4
3.4.1	G	As the questions and criticisms about the OCP are not cleared yet, the OCP should not find mention in the new standard.	Delete 3.4
3.4.1	G	Alternative verification Systems: The organizations are annually audited by a third party while also checked the incoming and outgoing FSC quantities. We never had bugs and we don't know an organisation which had bugs in the past. So, why the additional checks? If errors are found, they should be analysed and tracked with the appropriate organisations.	Delete 3.4
3.4.1	T	The verification mechanism demanded will vary from company to company, as I have understood this new requirement, and this should be reflected in the requirement	Include: "based on scale and risk" or such
3.4.1	T	This must be clarified, because until now the text is very vaguely formulated. Concrete reference points must be formulated to clarify what needs to audited. E.g. credit notes	Need of clarification
3.4.1	G	Until basic information (such as the problem description and the evaluation of it's extend) and a proposals for the required criteria of alternative methods have been provided, the consultation of section 3.4.1 should be suspended.	Suspension of the consultation for 3.4.1 until basic information (such as the problem description and the evaluation of it's extend) and a proposals for the required criteria of alternative methods have been provided.

3.4.1	G	<p>The requirements in the clause 3.4. are seen by the Russian Standard Development Group and Stakeholders as another step of FSC to make CHs use OCP system.</p> <p>The necessity to meet requirements is likely to result in additional expenditures for CHs that do not currently apply OCP.</p> <p>Another potential problem with which OCP-using CHs might confront is that one or more of their suppliers do not use OCP system. In this situation the company would need to create additional means of transaction verification for its suppliers, who do not apply OCP, face additional expenditures and use two systems at the same time (OCP and another one).</p>	<p>We suggest to remove this clause from the current version of the standard, or provide justification, that the implementation of these requirements will not cause additional burden to CHs.</p>
3.4.1	G	<p>Certificate holders in North America are finding it difficult to fully comment on the transaction verification requirement at this time as the information on conformance with this requirement are still under development and it is unclear what this will mean in practice. Also, more information is needed on what the alternative options for conformance.</p> <p>In general, there has also been a lot of concern about the amount of work this will take for certificate holders to comply with the requirement, which may increase the costs of managing an FSC certificate. Small companies and producers may especially be at risk as it seems as though this would substantially increase the amount of administrative burden and cost on small certificate holders. Similarly, there are a number of companies in the FSC system who do not have access to the internet, and this could result in a lot of extra work for group managers if they have to manage a transaction verification system for their members.</p>	<p>More information from FSC is needed on the full requirements of transaction verification before comments can be fully provided by certificate holders on this priority discussion topic.</p> <p>The second consultation on the COC standard consultation should not begin until a proposal for transaction verification has been fully developed.</p>
3.4.1	G	<p>This regulation 3.4.1 has to be suspended until the proposal of an “alternative verification system” is introduced.</p> <p>We generally reject the idea of the implementation of any database as the OCP and therefore we reject also any attempts that force organizations into that direction by making any alternative too complicated.</p> <p>The requirements to be met by an alternative verification method are not published yet and therefore they are not available for this draft. This procedure is not comprehensible enough to comment on without the necessary information.</p> <p>The requirements for alternative verification systems must be included in the main/ leading COC standard - not only in a supplementary document for certificate holders, like FSC-STD- 20-011. The Transaction Verification is one of the main changes of the chain of custody requirements. It is required to include the requirements for alternative systems of Transaction Verification into the second draft of the CoC standard and to consult it.</p> <p>The mechanism FSC asks for would be based on documents that are not available within the organizations.</p>	<p>This regulation has to be suspended until the proposal of an “alternative verification system” is introduced.</p>

3.4.1	E	<p>We believe Transaction Verification is the responsibility of the third-party audit process, and already addressed by multiple requirements within the Standard, such as:</p> <ol style="list-style-type: none"> <li>1) The Standard requires documented procedures, training, and record keeping as part of the Quality Management System (1.1-1.4). The CB should assess the organization's management system related to processes for, and accuracy of, inputs and outputs.</li> <li>2) Section 3.1 requires organization to maintain up-to-date records of suppliers' product types and material categories, and to verify validity of certificates.</li> <li>3) Section 3.2 requires confirmation of input claims documented on purchase and transport documents.</li> <li>4) Each organization must prepare an annual volume summary (5.2) that includes inputs received and outputs sold. This annual summary is an auditable report.</li> <li>5) Section 6.1 requires organization provide specific claim information for FSC sales.</li> </ol> <p>If the third-party audit successfully documents all of the above, there is not a need for an additional transaction verification system. The CB, and the organization purchasing FSC material, should catch unintended inaccurate accounting and claims with processes and checks already in place.</p> <p>Organizations committing fraud may not be detectable even with a Transaction Verification System. Other means already in place will eventually detect fraudulent practices.</p>	Delete requirement for Transaction Verification System.
3.4.1	E	<p>Transaction Verification – please consider the use of the Ontario Government's ITREES Stumpage system to verify virgin fiber inputs from Crown Land for primary manufacturing facilities. These loads are tracked by Government issued License and Approval numbers which refer back to a specific Crown Management Unit.</p> <p>Concerns regarding information that our finished product customers would require for their transaction verification. There are some records that are confidential.</p> <p>In order for FSC to ensure the mass balance is correct, the CB's should develop an audit process for this and then all CB's audits should adequately verify mass balance.</p>	
3.4.1	G	<p>The requirements for an alternative verification system are unknown and thereby they could not be consulted. Other methods must be characterised in the main standard and not in the accreditation standard. The passage "Other methods can include manual ... and supplier)." should be cancelled. The standards had to respect the local risk area and had to have adapted requirements.</p>	
3.4.1	G	<p>Transaction Verification should be done during the certification body's CoC surveillance audit. This adds additional costs and causes more burdensome work which adds little value and slows down the process. The verification is already provided on the invoice.</p>	Drop this requirement
3.4.1	G	<p>To ensure the volume controls in the FSC system this is done in a consistent robust manner we consider it fundamental for the credibility of the FSC system that the OCP system is made mandatory for all CoC certified operations. The requirement as it is written now is to open ended and provides FSC less ability to accurately manage critical market/product aggregate data</p>	The organization shall implement the FSC Online Claims Platform to allow the verification that the organization's recorded FSC input claims match the recorded FSC certified output claims of its suppliers.
3.4.1		<p>The requirements for an alternative procedure to assure transaction verification are not defined. We are not able to assess the provision as formulated and think that this clause cannot be consulted publicly in this format. Why FSC consults something incomplete is not comprehensible and we reject this approach.</p> <ol style="list-style-type: none"> <li>1. The requirements for alternative procedures to document transaction verification need to be written into the main standard document, thus need to be considered in the COC standard and must not be stipulated in a different document (FSC-STD-20-011). They</li> </ol>	



		<p>need to be considered in FSC-STD-COC-40-004 and consulted with this draft. The requirements need to be written into the 40-004 as this is the standard which describe the normative rules for FSC certified companies. We request to include the requirements for alternative procedures in the 40-004 draft and to consult them publicly.</p> <p>2. We highlight that there need to be a risk-based approach on the intensity of the transaction verification requirements. The risk approach should reference regions such as Europe or, if appropriate, whole countries (such as China).</p> <p>3. The transaction verification procedures need to be pragmatic and applicable. Over-demanding requirements will result in a decrease of COC certificate numbers and the availability of FSC material on the market.</p>	
3.4.1	G	<p>In summary, the circumstances of our business (construction services) are such that I cannot see how we could possibly verify every claim that we make / receive. The sheer volume of transactions and large number of clients / suppliers, combined with the possibility of multiple verification methods would make this an impossible task. Unless the proportion of claims requiring verification is very low, the requirement is likely to be impractical for businesses within the construction services sector.</p> <p>If the standard is adopted as written it is likely that we would be forced to consider alternatives to our FSC certification. The principal difficulties are described in detail below:</p> <p>1. We issue 12000 thousand invoices to hundreds of different clients every year. Since 98% of the timber that we purchase is certified for chain of custody, the majority of those invoices will bear a claim. Many of our clients are FSC certified. We are a medium sized organization (&lt;500 staff). It would appear that each request for verification will need to be verified manually, even if the on-line claims platform is used. Therefore the burden of responding to hundreds or even thousands of requests to verify our invoices will be unworkable.</p> <p>2. Since the use of the on-line claims platform is not mandatory, it is likely that many of our clients will select different methods. The need to respond to requests for verification through multiple methods will magnify the burden enormously.</p> <p>3. The documentation bearing our claim is either printed copy or pdf. A single document can contain several hundred parts. A client will have to manually enter these into the on-line claims platform (or alternative method) one by one. Any electronic invoicing &amp; delivery note system would be a major investment, requiring acceptance from hundreds of clients and is not going to happen on the time-scales for the adoption of the standard. Manual data entry is bound to lead to errors which will need to be resolved, further increasing the burden.</p> <p>4. We operate a transfer system in which we have complete segregation of certified materials and product. Almost all of our controls are fully automated through our ERP system. Not a single false claim has ever been detected at internal or external audit. The proposed verification requirements are entirely disproportionate to the risk.</p> <p>5. We receive over 1500 invoices per year from tens of suppliers. Each invoice may contain multiple line items. Since 98% of the timber that we purchase is certified for chain of custody, the majority of these invoices will bear a claim for one or more of the line items. Again, the burden of making thousands of requests for verification to multiple suppliers will be huge. Although it might be possible to automatically upload some of this information to the OCP, there is no guarantee that our suppliers will use the OCP. Since we must assume that some of our suppliers will not use the on-line claims platform, it is likely that this burden will be magnified by the need to use</p>	Delete the clause

		<p>multiple methods.</p> <p>6. We have no way to force suppliers to resolve disputes within 10 working days. Given that we might have to make thousands of requests for verification, it is likely that query and dispute resolution will be another significant burden.</p> <p>7. Some of the information displayed on the OCP is not supplier on the invoices received from our vendors. We will therefore be unable to complete the OCP in full based on the information that we currently receive. It might not be possible to persuade our vendors to change their standard invoices.</p>	
3.4.1	G	<p>This requirement was put in place to replace the FSC Online Claims Platform, a tracking system rejected by most FSC organizations. They encourage the use of the OCP but allow for “other methods”, which include MANUAL VERIFICATION, or another automated system shared between supplier and customer. With companies operating on different platforms, often accounting can be slightly different and difficult to manage in such a way that produces exactly the same accounting records with the same units, etc. This statement supports Alex MIsna’s comment re: increased cost due to increased networking between the various levels of suppliers to create this “shared network” of accounting.</p>	remove
3.4.1	G	<p>Do not build up a standard, people having only a theoretical alternative to the OCP.</p>	<p>Reasonable alternatives without cost-intensive solutions in view of time and money should be accepted (e.g. companies selling products with more than x t/a call their suppliers for a volume summary of their delivered quantities).</p>

3.4.1	G	<p>The transaction verification could be viewed as reasonable for FSC 'projects' such as building construction but has potential to be quite burdensome to large volume manufacturers where orders / receipts are daily activities. The flow of material is dynamic and we rely on the audit system in place today by FSC and their CB to assure the suppliers are following the appropriate procedures to provide material as specified. Our annual audit confirms that we have purchased the appropriate claim-contributing inputs and it is equal to or greater than our claimed outputs. Our suppliers go through this same audit process.</p> <p>An additional inspection/check step appears to be an unnecessary burden and could conceivably drive costs up with duplicated administrative waste. BIFMA members process thousands of purchase orders associated to FSC certification. Additional personnel would be required if the expectations for activities/documentation increases.</p> <p>This activity will not add value to our end consumer and we will therefore not be able to recoup the cost. There are no incentives for the end users that are not COC certified to close the loop on the sales transactions. If they do not, then the final seller (COC certified) will show only increase FSC inventory from their purchases and nothing from the deduction side of the equation.</p> <p>There is a very high level of confidence that the current system of transactions from the buyer to the seller are very accurate, this is based upon the current annual auditing requirements and quality process controls.</p> <p>It cannot be expected to have 100% accuracy between customer and supplier. Even within automated systems there are discrepancies of volumes due to difference in conversion factors, difference in accounting for material in transit, etc. Set a percentage of acceptable variation between supplier and customer. The variation needs to be stated explicitly so audits are consistent.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Eliminate this requirement.</p> <p>Or</p> <p>Eliminate the existing audit/annual reporting and tracking process.</p> <p>Or</p> <p>Increase the reporting responsibility on upstream originators and not downstream fabricators.</p> <p>Or</p> <p>If implemented as described, allow for a transaction discrepancy % between supplier and customer.</p>
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3.4.1	G	<p>The transaction verification could be viewed as reasonable for FSC 'projects' such as building construction but has potential to be quite burdensome to large volume manufacturers where orders / receipts are daily activities. The flow of material is dynamic and we rely on the audit system in place today by FSC and their CB to assure the suppliers are following the appropriate procedures to provide material as specified. Our annual audit confirms that we have purchased the appropriate claim-contributing inputs and it is equal to or greater than our claimed outputs. Our suppliers go through this same audit process.</p> <p>An additional inspection/check step appears to be an unnecessary burden and could conceivably drive costs up with duplicated administrative waste. BIFMA members process thousands of purchase orders associated to FSC certification. Additional personnel would be required if the expectations for activities/documentation increases.</p> <p>This activity will not add value to our end consumer and we will therefore not be able to recoup the cost. There are no incentives for the end users that are not COC certified to close the loop on the sales transactions. If they do not, then the final seller (COC certified) will show only increase FSC inventory from their purchases and nothing from the deduction side of the equation.</p> <p>There is a very high level of confidence that the current system of transactions from the buyer to the seller are very accurate, this is based upon the current annual auditing requirements and quality process controls.</p> <p>It cannot be expected to have 100% accuracy between customer and supplier. Even within automated systems there are discrepancies of volumes due to difference in conversion factors, difference in accounting for material in transit, etc. Set a percentage of acceptable variation between supplier and customer. The variation needs to be stated explicitly so audits are consistent.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Eliminate this requirement.</p> <p>Or</p> <p>Eliminate the existing audit/annual reporting and tracking process.</p> <p>Or</p> <p>Increase the reporting responsibility on upstream originators and not downstream fabricators.</p> <p>Or</p> <p>If implemented as described, allow for a transaction discrepancy % between supplier and customer.</p>
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3.4.1	G	<p>The transaction verification could be viewed as reasonable for FSC ‘projects’ such as building construction but has potential to be excessively burdensome to large volume manufacturers where orders / receipts are daily activities. The flow of material is dynamic and we rely on the audit system in place today by FSC and their CB to assure the suppliers are following the appropriate procedures to provide material as specified. Our annual audit confirms that we have purchased the appropriate claim-contributing inputs and it is equal to or greater than our claimed outputs. Our suppliers go through this same audit process.</p> <p>An additional inspection/check step appears to be an unnecessary burden and could conceivably drive costs up with duplicated administrative waste. Additional personnel would be required if the expectations for activities/documentation increases and will drive some of our smaller FSC vendors out of the FSC System.</p> <p>This activity will not add value to our end consumer and we will therefore not be able to recoup the cost. There are no incentives for the end users that are not COC certified to close the loop on the sales transactions. If they do not, then the final seller (COC certified) will show only increase FSC inventory from their purchases and nothing from the deduction side of the equation.</p> <p>There is a very high level of confidence that the current system of transactions from the buyer to the seller are very accurate, this is based upon the current annual auditing requirements and quality process controls.</p> <p>It cannot be expected to have 100% accuracy between customer and supplier. Even within automated systems there are discrepancies of volumes due to difference in conversion factors, difference in accounting for material in transit, etc. Set a percentage of acceptable variation between supplier and customer. The variation needs to be stated explicitly so audits are consistent.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Eliminate this requirement. Or Eliminate the existing audit/annual reporting and tracking process. Or Increase the reporting responsibility on upstream originators and not downstream fabricators. Or If implemented as described, allow for a transaction discrepancy % between supplier and customer.</p>
3.4.1	G/T	<p>Transaction verification It is not acceptable to have the following paragraph in this or in other FSC-standards: “The organization shall have a mechanism in place to allow the verification that the organization’s recorded FSC input claims match the recorded FSC certified output claims of its suppliers. NOTE: This can be achieved in various ways, such as through the FSC Online Claims Platform (ocp.fsc.org) or other methods. Other methods can include manual verification (e.g. material account records specific to each FSC certified trading partner are made available upon request by the respective trading partner or CB) or other automated systems (e.g. systems with a common record of input and output shared between customer and supplier).”</p> <p>This requirement is against the legal protection of data privacy. This is neither just and reasonable nor feasible. This paragraph obviously is a back door for FSC-OCP. The quoted argumentation to prevent originating errors is pleaded. Selling without valid FSC-certificates is impossible as there is an information if certificates are suspended. Terminated certificates become obvious by checking the expiration date. Generally presuming a totally “black-sheep”-trade without trust and honour is hard to believe and makes companies rethink the decision</p>	Delete completely without substitution

		for FSC.	
3.4.1		<p>1. In relation to the debate on OCP it was communicated that only after an investigation on the size of the errors concerning the declaration of certified products has taken place, and after this has been discussed, there will be a decision taken whether measures are necessary to control this problem.</p> <p>Until today nothing has been presented. The announced time lines were not complied with. Also there were never justifications for delays published. However the draft contains now a clause that stipulates the compulsory use of systems to solve these problems. We reject strongly such approach and request to suspend the consultation on this clause and to eliminate the clause from the draft for the time being until meaningful research has been published on the assumed problem. The result of such research should be consulted publicly.</p> <p>Only on such a basis of published and detailed analysis solutions which are pragmatic, applicable and economically appropriate could be developed.</p> <p>2. The suggested approach to regulate the important topic on criteria for requirements on transaction verification in a different standard than the COC-standard is rejected strongly. All relevant COC requirements for companies need to be included imperatively in this standard!</p>	
3.4.1	T	A concern about the OCP or on line platform is that not all companies have computerized system, especially companies and small producers, which will require standardization to verify the purchase and sale documents between certified companies or the development of another structure to verify the volume along the CoC of FSC products.	Insert information on FSC-STD-20-011 of how CB shall audit
3.4.1	G	<p>How is it possible to do it ? we don't have the authority to verify supplier exit : it is the role of Certification body and not of the customer !!!</p> <p>In case of supplier and customer are engage on OCP, files transfer and official documentation is invoice and in the most of case invoice is establish at the end of the month : how it's possible to match at each deliveries if there is a lot of deliveries during the month ?</p> <p>Also, it's not possible to ask at each delivery some information at the CB (who paid this tasks ?) and also it's not possible to finance a cost of Exchange electronic Data (Who paid ?)</p> <p>This requirement is not acceptable : if there is an obligation to demonstrate that there is no error in the system for each transaction, why it is necessary to have annual audit ?</p>	<p><b>Keep actual system that CB is responsible to control integrity of Coc.</b></p> <p><b>Another solution is that FSC develop audit and control with your own police force.</b></p> <p><b>The "good company" engage in FSC and who promote FSC can't support requirements and cost for the bad company. This is the problem of FSC who must control his system and remove certificate if necessary.</b></p>

3.4.1	T	<p>Wording on 3.4.1 is well worded however the certification bodies and accreditation standards have not been disclosed to highlight to what intensity an audit will entail. We cannot approve a normative requirement or stand behind that requirement until the auditing methods and alternative options have been vetted.</p>	<p>We cannot stand behind this section of the standards until all research highlighting origination errors has been disclosed to all Certificate Holders and stakeholders in a transparent way.</p> <p>Additionally: The standard should not be fully approved until 20-011 requirements and wording has been released for first consult and comments received back. Alternatives should not be requested from CH's until FSC and CBs can determine a consistent method that they will hold all certificate holders to and what time and cost this new system will incur. There are major issues with auditing consistency and this new proposed standard.</p>
3.4.1	G	<p>The OCP was born to grant a necessary transparency on COC processes, once there are not public summaries available; however there are doubts on how FSC would grant visibility for information without let them lose their confidentiality. That is why the OCP platform is so problematic, because it has lost the reason of its creation.</p> <p>Furthermore, OCP is vulnerable in security terms, due to the volume of data which is kept in only one tool and to the extremely confidential content, intended by market agents.</p> <p>For this reason, this tool became voluntary by FSC and has allowed some suppliers choose it, but also others choose the INFO. This way, consumers will have to verify two references, and this will disrupt the transaction verification, and could even compromise the understanding of claims, driving to contradictions, for example.</p>	<p>FSC should indicate what have to be done to avoid false claims based on the transaction verification and not to determine in how to conduct this verification which should be done by each certified organization, as occurs with the requirements of all FSC standards.</p>
3.4.1	G	<p>V1: We generally reject the idea of the implementation of any database as the OCP and therefore we reject also any attempts that force organizations into that direction by making any alternative too complicated.</p> <p>The requirements to be met by an alternative verification method are not published yet and therefore they are not available for this draft. This procedure is not comprehensible enough to comment on without the necessary information.</p> <p>The requirements for alternative verification systems must be included in the main/ leading COC standard - not only in a supplementary document for certificate holders, like FSC-STD- 20-011. The Transaction Verification is one of the main changes of the chain of custody requirements. It is required to include the requirements for alternative systems of Transaction Verification into the second draft of the CoC standard and to consult it.</p> <p>The mechanism FSC asks for would be based on documents that are not available within the organizations.</p>	
3.4.1	T	<p>Should this be strengthened by requiring that all audits by ASI-accredited auditors must include checks that the Organization has such a verification system and that it is fully functioning? This seems to be a critical part of the CoC system, especially for multi-site CoC, and so might need extra precautions?</p>	<p>Clarify just what would be inserted in the accreditation standard FSC-STD-20-011; see last paragraph in Note on page 17.</p>

3.4.1		<p>This section of the standard is very unclear, and appears to be a continuation of the FSC OCP under a different name. In the development of the FSC OCP, FSC International has stated that implementation of this platform is being driven by false claims in the marketplace, though there has been a lack of information on the part of FSC to support this claim. The OCP process, as proposed, would impose significant costs on certificate holders in an attempt to prevent these alleged false claims. The required documentation within OCP represents a significant increase in data input, requiring significantly more administrative resources throughout the supply chain than the current system. In essence, the costs to certificate holders appear to outweigh the intended benefits of the platform change.</p> <p>There are also concerns around the potential for unintended release or access to sensitive or proprietary information if access is granted to records.</p>	This indicator should be deleted.
3.4.1	T	<p>We acknowledge that there are instances of misapplication and dishonesty in the FSC marketplace that can lead to origination errors. These are unavoidable facts of life. FSC is not, and never will be, immune to either. Unlike most business sectors, though, we have the advantage of a third-party verification process. If we think that there is either too much dishonesty, or too much error in the FSC CoC system, the answer is to strengthen the certification and verification system we already have, not to develop an additional transaction verification mechanism. We have previously provided comments in a number of meetings of the FSC Economic Chamber against the use of Online Claims Platform as it is expensive, complicated, impossible to audit accurately and most importantly that it is unnecessary.</p>	<p>We propose to delete this clause entirely and find more practical solutions to reduce errors and to isolate and challenge dishonesty in the system. As discussed in the FSC Strategic Plan, there is a new to simplify standards and not make them more complex. Complexity adds costs and leads to more errors.</p> <p>The only practical mechanism that exists to identify and challenge intentional mis-use of the FSC claim are the people who's job is to regular check on each and every certified company. Auditors and Certification Bodies (CB's) should be held to high standards of professional conduct. They should also be freed to apply their considerable skills and experience to the verification process.</p> <p>We also support risk-based evaluation to focus on those areas of the world where it is believed that there is a greater risk of intentional misuse of the FSC claim.</p>



3.4.1	G	<p>The transaction verification could be viewed as reasonable for FSC 'projects' such as building construction but has potential to be quite burdensome to large volume manufacturers where orders / receipts are daily activities. The flow of material is dynamic and we rely on the audit system in place today by FSC and their CB to assure the suppliers are following the appropriate procedures to provide material as specified. Our annual audit confirms that we have purchased the appropriate claim-contributing inputs and it is equal to or greater than our claimed outputs. Our suppliers go through this same audit process.</p> <p>An additional inspection/check step appears to be an unnecessary burden and could conceivably drive costs up with duplicated administrative waste. We process many purchase orders associated to FSC certification. Additional personnel would be required if the expectations for activities/documentation increases.</p> <p>This activity will not add value to our end consumer and we will therefore not be able to recoup the cost. There are no incentives for the end users that are not COC certified to close the loop on the sales transactions. If they do not, then the final seller (COC certified) will show only increase FSC inventory from their purchases and nothing from the deduction side of the equation.</p> <p>There is a very high level of confidence that the current system of transactions from the buyer to the seller are very accurate, this is based upon the current annual auditing requirements and quality process controls.</p> <p>It cannot be expected to have 100% accuracy between customer and supplier. Even within automated systems there are discrepancies of volumes due to difference in conversion factors, difference in accounting for material in transit, etc. Set a percentage of acceptable variation between supplier and customer. The variation needs to be stated explicitly so audits are consistent.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Eliminate this requirement.</p> <p>Or</p> <p>Eliminate the existing audit/annual reporting and tracking process.</p> <p>Or</p> <p>Increase the reporting responsibility on upstream originators and not downstream fabricators.</p> <p>Or</p> <p>If implemented as described, allow for a transaction discrepancy % between supplier and customer.</p>
3.4.1	T	<p>Requiring 14 calendar days to complete the OCP may be too short of a time period. With various company schedules, specifically around holidays, many companies may have a tough time meeting this requirement.</p>	<p>Consider the process of matching claims to take place within 45 calendar days after the organization claims it as a certified input.</p>
3.4.1	G	<p>The OCP was born to grant a necessary transparency on COC processes, once there are not public summaries available; however there are doubts on how FSC would grant visibility for information without let them lose their confidentiality. That is why the OCP platform is so problematic, because it has lost the reason of its creation.</p> <p>Furthermore, OCP is vulnerable in security terms, due to the volume of data which is kept in only one tool and to the extremely confidential content, intended by market agents.</p> <p>For this reason, this tool became voluntary by FSC and has allowed some suppliers choose it, but also others choose the INFO. This way, consumers will have to verify two references, and this will disrupt the transaction verification, and could even compromise the understanding of claims, driving to contradictions, for example.</p>	<p>FSC should indicate what have to be done to avoid false claims based on the transaction verification and not to determine in how to conduct this verification which should be done by each certified organization, as occurs with the requirements of all FSC standards.</p>

3.4.1	E, T	We welcome the introduction of a risk based system that allows companies to choose the system best suited to their operations and supply chain risks. We recognize that FSC will consult on a document that provides criteria to audit based on scale, intensity and risk (SIR). However, we do not agree that the outcome of this consultation will be inserted in the accreditation standard FSC-STD-20-001. Instead, the outcome of the consultation should be issued as a guidance document thus still providing an opportunity for organisations to fulfil the requirement in a way best suited to their own operation and supply chain.	New wording The organisation shall have a mechanism in place to allow the certification body upon request that the organisation's recorded FSC input claims match the recorded certified output claims. This mechanism should be appropriate for the risk level with respect to the geographic area and sector concerned.
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3.4.1	T	If possible please consider to make an exception for finished products.	Suggestion: "3.4.2: If there's no further physical transformation of the product during the supply chain, chapter 3.4.1 does not refer to finished and already labeled products, which are sold to wholesalers or retailers (regardless of whether these wholesalers and retailers are certified or not)."
3.4.1	G	The use of the OCP does not apply for Mohn Media due to the non-transferable risks revealing our supplier-customer-relationship in a cloud-based, external programmed software tool. The formulation of an alternative method is, however, at present too indefinite to be able to give an estimation of the criterion. It is not visible - in which way - at which time interval - by whom a verification of the transactions is to be made.	We recommend to take out the point „Transaction verification“ from the revision of the COC standard, until the FSC has explained and stated under which preconditions an implementation of the requirement can be fulfilled: - does a risk-based approach exist or must we generally suspect a false declaration on the part of our suppliers? - who carries out the “Transaction verification” (certifier or self-monitoring)? - which consequences result from a non-conformity on the part of the supplier We propose that the verification should be carried out by the certifying organizations. When misuse of FSC claims or the use of claims from non-certified companies is suspected, the certifying

			organizations should be able to communicate among themselves.
3.4.1	T-G	<p>Verification of Claims is the province of the CBs not the Certificate Holders. The requirement that Cert holders verify internal docs of their suppliers represents a FUNDAMENTAL CHANGE TO THE COC SYSTEM, where each company is responsible for the integrity of their link in the chain. After we verify that our supplier has a valid certificate to sell the material category we are purchasing, we have completed our link in the chain. What 3.4.1 is saying is that NIETHER FSC nor the CB's are willing to take responsibility for the FSC system. SO THEY ARE PASSING THE BUCK TO THE CERTIFICATE HOLDERS. The CB's and FSC intl need to figure out how implement this process. This is NOT THE PERVIEW OF THE CERTIFICATE HOLDER TO VERIFY ACTIVITIES OF THE SUPPLIER. THIS VIOLATES THE FUNDAMENTAL AUTONOMY AND PRIVACY OF PRIVATE BUSINESSES.</p> <p>IF FSC cannot guarantee the integrity of its product I may as well review my sources all the back to the forest and self certify.</p>	ELIMINATE 3.4.1 FROM THE COC STANDARD FOR CERTIFICATE HOLDERS. THIS SHOULD BE ADDRESSED BY FSC INTL AND THE CBS AS PART OF THE LICENSING PROCEDURE.
3.4.1	G	<p>Regarding the assumption that FSC input claims match the FSC certified output claims of its suppliers, it is not clear whether this includes volume or not, or it only covers FSC claim.</p> <p>If it requires matching input volume with volume of suppliers' output, we would like to report that there are cases that the volumes do not match.</p> <p>For example, when buyers do not demand FSC certified materials or buyers are not certified, even when suppliers supply materials as FSC certified, the buyer does not treat it as FSC certified materials.</p> <p>Such cases are different from two cases where volumes do not match raised in "Note for stakeholders" under 3.4.1. and should be justified and accepted.</p>	Input volume and Output volume of suppliers do not necessary match; It should be ok if Supplier output >= Organization input
3.4.1	G	<p>We are not clear about the use of OCP, but it seems it is necessary to enter the data every time there is transaction. We do not prefer to increase work burden any more. It says that use of OCP is optional, but we are afraid that we will be required to use it when a buyer propose use of OCP.</p> <p>We are also concerned about confidentiality of the data.</p>	<p>We prefer not to have OCP as an option.</p> <p>If entering data to OCP is not correctly done, the result will be the same as before.</p> <p>As it is already written in page 17, we think it is ok as long as certification body holds the authority to investigate that the volume match, and when the record does not match, conducts investigation of the cause to improve the error.</p>

3.4.1	G	<p>The transaction verification could be viewed as reasonable for FSC 'projects' such as building construction but has potential to be quite burdensome to large volume manufacturers where orders / receipts are daily activities. The flow of material is dynamic and we rely on the audit system in place today by FSC and their CB to assure the suppliers are following the appropriate procedures to provide material as specified. Our annual audit confirms that we have purchased the appropriate claim-contributing inputs and it is equal to or greater than our claimed outputs. Our suppliers go through this same audit process.</p> <p>An additional inspection/check step appears to be an unnecessary burden and could conceivably drive costs up with duplicated administrative waste. BIFMA members process thousands of purchase orders associated to FSC certification. Additional personnel would be required if the expectations for activities/documentation increases.</p> <p>This activity will not add value to our end consumer and we will therefore not be able to recoup the cost. There are no incentives for the end users that are not COC certified to close the loop on the sales transactions. If they do not, then the final seller (COC certified) will show only increase FSC inventory from their purchases and nothing from the deduction side of the equation.</p> <p>There is a very high level of confidence that the current system of transactions from the buyer to the seller are very accurate, this is based upon the current annual auditing requirements and quality process controls.</p> <p>It cannot be expected to have 100% accuracy between customer and supplier. Even within automated systems there are discrepancies of volumes due to difference in conversion factors, difference in accounting for material in transit, etc. Set a percentage of acceptable variation between supplier and customer. The variation needs to be stated explicitly so audits are consistent.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Eliminate this requirement.</p> <p>Or</p> <p>Eliminate the existing audit/annual reporting and tracking process.</p> <p>Or</p> <p>Increase the reporting responsibility on upstream originators and not downstream fabricators.</p> <p>Or</p> <p>If implemented as described, allow for a transaction discrepancy % between supplier and customer.</p>
3.4.1	G	<p>After countless discussion with various stakeholders (CH, CB, IT, consultants, associations) we are still not able to understand potential impact if 3.4.1.</p> <p>Webinar called "Transaction Verification" and material sent out accordingly was disappointing. No concrete answers on requirements of alternatives to OCP. It was more or less a sales event for OCP. Material contains 6 slides about alternatives and 60 slides about OCP. There are much more open than answered questions.</p> <p>By forcing CH's to join the OCP, FSC raises unrealistic expectations to be on the safe side. Example: I assume not one European paper merchant will join the OCP. If FSC forces printers to join, they will have no benefit of it. Verification had to be done "with alternative system anyway", because they don't get verification in OCP. Beside of that, a second system for PEFC has to be in place in any case.</p>	<p>Postpone revision of 3.4.1</p> <p>Instead taking the risk to add "everything goes, maybe" paragraph to the standard, unclear issues should be clarified before. E.g. clarify role of CB's and CH. Who is doing what/ Requirements in relation to risk criteria's by geographical area, industry, cert. system, etc./ if one wants to use OCP, how to avoid this is not hindering him in to choose supplier without OCP. Using OCP shall not be competitive advantage/ How to design a transaction verification system, meeting traceability requirements for both FSC and PEFC.</p>

			PEFC is a reality; we can't afford to have two systems in place.
3.4.1	G/T	Due to physical separation along supply chain, transfer system is very transparent regarding input/output volumes. This should be reflected in the requirements to fulfil 3.4.1. (If not considered in standard, it should be at least in following guide lines or advice notes)	Requirements of transfer system should not be considered equal to credit and percentage system
3.4.1	T	Direct link from CH's ERP systems to FSC data base would secure 1:1 update of supplier's certification status.	FSC enables direct connection to relevant information in FSC data-base
3.4.1	G/T	Transaction verification It is not acceptable to have the following paragraph in this or in other FSC-standards: "The organization shall have a mechanism in place to allow the verification that the organization's recorded FSC input claims match the recorded FSC certified output claims of its suppliers. NOTE: This can be achieved in various ways, such as through the FSC Online Claims Platform (ocp.fsc.org) or other methods. Other methods can include manual verification (e.g. material account records specific to each FSC certified trading partner are made available upon request by the respective trading partner or CB) or other automated systems (e.g. systems with a common record of input and output shared between customer and supplier)."  This requirement is against the legal protection of data privacy. This is neither just and reasonable nor feasible. This paragraph obviously is a back door for FSC-OCP. The quoted argumentation to prevent originating errors is pleaded. Selling without valid FSC-certificates is impossible as there is an information if certificates are suspended. Terminated certificates become obvious by checking the expiration date. Generally presuming a totally "black-sheep"-trade without trust and honour is hard to believe and makes companies rethink the decision for FSC.	Delete completely without substitution.
3.4.1	G	The new OCP process seems difficult. We are a commercial printer. For our house stocks we track it using the "inventory" method. We buy a lot of it, but don't use near all of it for FSC-labeled jobs. So at the end of the year, our VSR looks way out of balance. It looks like we have a lot of FSC stock in inventory, but in reality we just used it for jobs that were not labeled as FSC. Will we be forced to handle the inventory in another way? That seems very complicated. Also, we don't want to be in the position to have to order house stock just for FSC jobs because we normally buy house stock in huge bulk amounts.	
3.4.1	G	The requirements to be met by an alternative transactional verification methods are not published/ not completely clear even for FSC at the moment and therefore they are not available for this consultation period. This procedure is not comprehensible enough to comment on it without having the all needed information available	

3.4.1	G	The requirements for alternative verification systems must be also included in the main/ leading COC standard - not only in a supplementary document for certificate holders, the COC accreditation standard for certification bodies (FSC-STD- 20-011 here). The Transaction Verification is one of the main changes of the chain of custody requirements. Companies must be disclosed in the applicable CoC standard these regulations. It is required to include the requirements for alternative systems of Transaction Verification into the second draft of the CoC standard and to consult in this framework. There is a risk that only a few companies will give feedback on supplementary documents and that there will be no changes in this standard. Although this is FSC compliant that can cause a loss of reputation.	
3.4.1	G	Alternative verification systems must be risk-based. Depending on the risk there should be a 100 % inspection or a small sampling inspection. The risk approach should in particular relate to countries. The criteria could be the corruption index CPI.	
3.4.1	G	The alternative verification systems must be pragmatic and applicable. After OCP was not made mandatory it shouldn't be introduced through the back door, because the alternatives are so complex and complicated that there are de facto no alternatives to OCP. This indirect introduction of OCP will cause a lot of reputation damage for the FSC International. Excessive requirements can lead to a series cessation of FSC certifications.	
3.4.1		The OCP is not operating and I think in very much longer trip we can put 29.000.- CoC. I think it is good OCP as an example when the system is up and running	
3.4.1	G	The obligation placed on the certificate holder to match input claims to our supplier output claims will add effort and cost for both parties that we do not believe are necessary.	Withdraw proposed new requirement.
3.4.1	G	It is absolutely unnecessary to require that certified FSC COC participants need to verify the legitimacy of claims made by FSC Certified suppliers with verified certificates with whom they do business. What is the purpose of being audited every year if there is then no trust in the third party verification of their system? Does FSC International not trust its own accredited audit process? The OCP has been rejected in the marketplace for good reasons: it will be a costly administrative burden, it could compromise an organization's sensitive information, and FSC has not yet documented that the issue is of significant magnitude. Any "other methods" that may be developed will have the same issues. The fact that no "other methods" have been forthcoming testifies to this. Just because something is desired or mandated by motion does not mean that it can be accomplished or implemented practically & efficiently. This will be an unnecessary burden on the majority of those who conform to the requirements, and it will not ultimately prevent wanted & wilful falsification by the few bad apples.	The proposed requirements for transaction verification should be dropped.
3.4.1	G	The transaction verification requirement is difficult to comment on at this time. The instructions for conforming to this requirement are still under development and it is unclear what this will mean in practice and what the alternative options for conformance will be other than the Online Claims Platform. Additionally, the Terms & Conditions currently required by the Online Claims Platform also present challenges to many certificate holders and therefore testing the Online Claims Platform at this time is not possible.	Due to the challenges associated to providing any comments it is requested that an extension be granted to the public consultation period.

3.4.1	T	<p>This is a recycling of the OCP issue which was re-evaluated as voluntary. Now it's a no choice, either OCP or your own version which = same problem.</p> <p>The optional alternative is just OCP in disguise, and many CHs simply cannot incorporate either choices, furthermore there is a real cost in the exercise which should be the responsibility of FSC not the CHs. Furthermore – in the Stakeholder Notes, it's suggested that CB's should audit the 'chosen method'</p>	<p>This needs to be removed. FSC are fully aware of the hostility to this process due to the lack of staff in many cases, &amp; since FSC have no real indication of the variation in actual certified material in the market, this will still not solve the problem. If FSC insist on pushing this further, then firstly as it is self-validation, CHs should only need auditing every two years, and secondly, more clients will cancel their certification.</p> <p>Leaving the decision of auditing on such a specific issue to the CB's is a recipe for disaster and variable assessment, so this should be removed completely</p>
3.4.1	G	<p>We generally reject the idea of the implementation of any database as the OCP and therefore we reject also any attempts that force organizations into that direction by making any alternative too complicated.</p> <p>The requirements to be met by an alternative verification method are not published yet and therefore they are not available for this draft. This procedure is not comprehensible enough to comment on without the necessary information.</p> <p>The requirements for alternative verification systems must be included in the main/ leading COC standard - not only in a supplementary document for certificate holders, like FSC-STD- 20-011. The Transaction Verification is one of the main changes of the chain of custody requirements. It is required to include the requirements for alternative systems of Transaction Verification into the second draft of the CoC standard and to consult it.</p> <p>The mechanism FSC asks for would be based on documents that are not available within the organizations.</p>	
3.4.1	G	<p>Organization does not wish to make customer list available to general public in open online platform. Will be more than willing to supply customers, products, and volumes minus any monetary figures to CB upon request. Current wording could be in possible violation of US antitrust laws.</p>	<p>Material account records specific to each FSC certified trading partner made available upon request to the CB should suffice for the information required.</p>
3.4.1	G	<p>The transaction verification could be viewed as reasonable for FSC 'projects' such as building construction but has potential to be quite burdensome to large volume manufacturers where orders / receipts are daily activities. The flow of material is dynamic and we rely on the audit system in place today by FSC and their CB to assure the suppliers are following the appropriate procedures to provide material as specified. Our annual audit confirms that we have purchased the appropriate claim-contributing inputs and it is equal to or greater than our claimed outputs. Our suppliers go through this same audit process.</p> <p>An additional inspection/check step is an unnecessary burden and could conceivably drive costs up with duplicated administrative waste.</p> <p>We processed over 12,000 purchase order lines in 2014 that were associated to FSC certification. Additional personnel would be required if the expectations for activities/documentation increase. This activity will not add value to our end consumer and we will therefore not be able to recoup the cost.</p> <p>It cannot be expected to have 100% accuracy between customer and supplier. Even within automated systems there are discrepancies of volumes due to difference in conversion factors, difference in accounting for material in transit, etc. Set a percentage of</p>	<p>Eliminate this requirement Or Eliminate the existing audit/annual reporting and tracking process Or Increase the reporting responsibility on upstream originators and not downstream fabricators Or If implemented as described, allow for a transaction discrepancy % between supplier and customer.</p>

		acceptable variation between supplier and customer. The variation needs to be stated explicitly so audits are consistent.	
3.4.1	T	Verification of the requirement at audit by CBs will be very controversial. It is not easy for each CH to access internal information of their suppliers by information barrier in terms of business confidentiality. Accessibility of such information should be defined as responsibility of suppliers' side	Remove the requirement. Add a new requirement at clause 5.1 or 5.2, i.e. maintaining sales ledger with FSC claim information for each customer and allowing the information accessible to each customer and CB responsible for the customer CoC audit on request.
3.4.1	T	The method for third-party auditing is not defined. It can be assumed that auditor and certificate holder will come to different evaluations which criterias are to be used.	Delete this clause
3.4.1	T	If a CH (certificate holder) does not use the on-line claims platform or something similar (which really does not exist), then they have to have access to supplier records. Requiring that would not only be onerous, but extremely intrusive on suppliers, possibly not legal, and would basically mean everyone gets double-audited – by their own CB and by everyone they sell FSC product to. Audits by CBs will become more involved and longer. Unless: The Note: does allow an exception when there is a common record of shared input and output, which will be beneficial to many large mills in North America whose accounting systems are jointly used by both the suppliers and buyers of virgin fiber. In the NOTE FOR STAKEHOLDERS, it says “FSC will introduce a requirement for CHs to demonstrate that FSC input claims match supplier’s internal records.” Does that mean additional requirements are coming, or does it refer to what has already been drafted in 3.4.1?	Delete the access to supplier records requirement.



3.4.1	G/T	<p>Transaction verification</p> <p>It is not acceptable to have the following paragraph in this or in other FSC-standards:          “The organization shall have a mechanism in place to allow the verification that the organization’s recorded FSC input claims match the recorded FSC certified output claims of its suppliers.          NOTE: This can be achieved in various ways, such as through the FSC Online Claims Platform (ocp.fsc.org) or other methods. Other methods can include manual verification (e.g. material account records specific to each FSC certified trading partner are made available upon request by the respective trading partner or CB) or other automated systems (e.g. systems with a common record of input and output shared between customer and supplier).”</p> <p>This requirement is against the legal protection of data privacy. This is neither just and reasonable nor feasible. This paragraph obviously is a back door for FSC-OCP.</p> <p>The quoted argumentation to prevent originating errors is pleaded. Selling without valid FSC-certificates is impossible as there is an information if certificates are suspended. Terminated certificates become obvious by checking the expiration date.</p> <p>Generally presuming a totally “black-sheep”-trade without trust and honour is hard to believe and makes companies rethink the decision for FSC.</p>	Delete completely without substitution.
3.4.1	T	Transaction verification system	<p>Important that the accreditation standard consist of acceptable and relevant demands.</p> <p>Companies must feel that the extra burden makes a difference. That the extra work address and solve a real problem.</p> <p>If a company in example do several supplier audits during several years and no problems are found the commitment to continue to follow up suppliers are lost.</p> <p>The risk based approach must be balanced so the extra burden. to perform supplier audits is acceptable</p> <p>That the extra work solve a problem!          FSC does not want to be connected to unnecessary work!!</p>
3.4.1	T	<p>The term “claim” is used here to mean, FSC Claim, quantity etc. It is very confusing since “FSC Claim” is a defined term which means one of FSC 100%, FSC Mix X%, FSC Mix Credit, FSC Recycled X%, FSC Recycled Credit and FSC Controlled Wood.</p> <p>From the current wording, it indicates that only “FSC Claim” information has to be verified and no other information such as quantity, product description etc do not need to be verified.</p>	<p>Avoid using the term “claim” here to explain about information needed to be verified.</p> <p>In fact the information needed to be verified must be specifically mentioned here. E.g. quantity, description, FSC claim, transaction date.</p>
3.4.1	T	It is not clear how this requirement can be met by certificate holders with multiple sites.	Clarify responsibilities and duties of central office and participating sites.

3.4.1		<p>This not going to be feasible and, if implemented, will be an administrative burden for all parties involved. In a state where automation and automated systems are, or becoming, the norm, why is this being implemented? There will never be 100% compliance, yet this seems to be a solution to a very small to non-existent problem. I've been told that if transaction verification is implemented and becomes a required element, that everyone in our supply chain will be conducting a serious review of their CoC certification and may, in fact no longer continue with their FSC Certification. This would impact end users, printers and FSC in a very negative light.</p> <p>Transaction verification in either way – using the OCP and any other method – won't be feasible.</p>	This needs to be removed from the standard.
3.4.1	G	<p>The requirement that an organization shall have a mechanism in place to allow the verification that the organization's recorded FSC input claims match the recorded FSC certified output claims of its suppliers will require substantial additional administrative work. The reporting and follow up to ensure 100 % balancing will become an administrative nightmare. Some of the information required could be considered confidential. To establish a system to share information will require an additional level of programs and programming to ensure that the required information is shared / transmitted. Making information available between trading partners when required should be done in the context of the supplier / customer relationship and the two business partners need to establish any information requirements between themselves without FSC having to control this.</p>	Need to continue to rely on the annual standard internal and external audits to confirm that organizations are properly recording inputs and outputs. Eliminate this requirement.
3.4.1	G, T	<p>UPM welcomes the introduction of a risk based system that allows companies to choose the system best suited to their operations and supply chain risks. We recognize that FSC will consult on a document that provides criteria to audit based on scale, intensity and risk (SIR). However, UPM does not agree that the outcome of this consultation will be inserted in the accreditation standard FSC-STD-20-001. Instead, the outcome of the consultation should be issued as a guidance document thus still providing an opportunity for organisations to fulfil the requirement in a way best suited to their own operation and supply chain.</p>	<p>New wording</p> <p>The organisation shall have a mechanism in place to allow the certification body upon request that the organisation's recorded FSC input claims match the recorded certified output claims. This mechanism should be appropriate for the risk level with respect to the geographic area and sector concerned.</p>
3.4.1	G, T	<p>UPM welcomes the introduction of a risk based system that allows companies to choose the system best suited to their operations and supply chain risks. We recognize that FSC will consult on a document that provides criteria to audit based on scale, intensity and risk (SIR). However, UPM does not agree that the outcome of this consultation will be inserted in the accreditation standard FSC-STD-20-001. Instead, the outcome of the consultation should be issued as a guidance document thus still providing an opportunity for organisations to fulfil the requirement in a way best suited to their own operation and supply chain.</p>	<p>New wording</p> <p>The organisation shall have a mechanism in place to allow the certification body upon request that the organisation's recorded FSC input claims match the recorded certified output claims. This mechanism should be appropriate for the risk level with respect to the geographic area and sector concerned.</p>
3.4.1	G, T	<p>UPM welcomes the introduction of a risk based system that allows companies to choose the system best suited to their operations and supply chain risks. We recognize that FSC will consult on a document that provides criteria to audit based on scale, intensity and risk (SIR). However, UPM does not agree that the outcome of this consultation will be inserted in the accreditation standard FSC-STD-20-001. Instead, the outcome of the consultation should be issued as a guidance document thus still providing an opportunity for organisations to fulfil the requirement in a way best suited to their own operation and supply chain.</p>	<p>New wording</p> <p>The organisation shall have a mechanism in place to allow the certification body upon request that the organisation's recorded FSC input claims match the recorded certified output claims. This mechanism should be appropriate for the risk level with respect to the geographic area and sector concerned.</p>

3.4.1	E	<p>This is a requirement for a certificate holder to audit their supplier's records. This will be a huge expense in staff time and cost. Most CHs have many suppliers and customers, so the magnitude of this task will be hard to manage.</p> <p>Before this section is implemented, CBs should attempt to strengthen audit procedures to discover the issues this section attempts to address.</p> <p>Any criteria related to this that may appear in FSC-STD-20-011 ( FSC US Emily Crumley's Five Key Elements) should also appear in section 3.4.1. Organizations should not need to consult multiple standards to determine what will be required.</p> <p>A risk based approach to this issue makes sense.</p>	<p>Develop a risk based approach to solving the transaction verification challenge.</p> <p>Empower CBs to do the heavy lifting rather than create an onerous mechanism for CHs to develop, implement and pay for, which may not prevent dishonesty and fraud on the part of a minority of certificate holders.</p> <p>Any criteria related to this that may appear in FSC-STD-20-011 (FSC US Emily Crumley's Five Key Elements) should also appear in section 3.4.1. Organizations should not need to consult multiple standards to determine what will be required.</p>
3.4.1	G	<p>We in principal cannot agree that this has to be done by the certificate holder rather than certification body. We understand the problem that incorrect sales documents can be issued and different certification bodies might not notice this, however the root cause of the issue is that dishonest certificate holders are cheating and certification bodies cannot properly do their job. In fact the issue has nothing to do with the most of the companies, which are following the standard requirements, therefore applying this section to them is not fair. It obviously requires extra work and resources to implement as well as will be difficult to handle for certificate holder, which has many different suppliers (as some of them might not use OCP and several verification methods will be applied). Also this will be not an easy task for very small enterprises and in most cases they will be forced to ask for third part verification what will increase the certification costs. Admitting that current system leaves place for "green washing" we suggest applying 3.4.1 section to certification bodies. They are specialists in auditing and certification field, therefore could easily determinate the risks of each their client depending on countries CPI, identified non-compliances or other criteria as well as cooperate with supplier certification body in exchanging data on trading documentation. It is important to notice that already now each certificate holder develops annual volume summary, supplier list, which is accessible to its certification body. So at the moment certification bodies dispose information for controlling correct claims, just they need to cooperate more closely. Other option to solve this issue to our mind is making OCP compulsory to all certificate holders. One more issue related to this requirement is, that current suggestion still leaves place for cheating, because buyer can agree with the supplier that supplier will give some "randomly chosen" records showing that claim is correct (as I understood amount of records chosen for verification will depend on risk assessment). How CB will prove, that checked records are not chosen randomly?</p>	<p>We suggest that this requirement would be withdrawn and issue would be solved through more close cooperation between CBs or making OCP compulsory to all certificate holders.</p>
3.4.1	T	<p>Until the provision of basis and suggestions of requirement criteria of alternative methods to OCP the consultation of point 3.4.1 should be suspended.</p>	
3.4.1	G	<p>Transaction Verification should be done during the certification body's audit. Additional costs (and little value) will be incurred if each customer has to ask his supplier for verification of claims. The verification is already provide on the invoice.</p>	<p>Drop this requirement</p>

3.4.1	T/G	<p>The Note 'In order to address the opportunity for origination errors, FSC will introduce a requirement for certificate holders to demonstrate that FSC input claims match the suppliers' internal records.' Pre-empts the requirements outlined by</p> <p>1) FSC Board (28.08.2014) and</p> <p>2) OCP Process Roadmap which have yet to be fulfilled. As follows:</p> <p>1) Towards a stronger FSC Chain of Custody system: Statement from the Forest Stewardship Council (FSC) 28.08.2014. page 1 Para 4, item 2 'In light of this, the Board: Has requested that more detailed information be collected on the extent of incorrect claims in the FSC system. This should be done in 2015 as part of the process to implement a revised CoC standard, once approved.</p>	<p>The inclusion of Transaction verification within the CoC standard should only be considered once the fact finding and presentation of these findings has been completed. The extent of the problem and therefore the need for this section has therefore not been proven.</p> <p>The Fact finding process has only begun in January 2015 (<a href="https://ic.fsc.org/technical-updates.325.1046.htm">https://ic.fsc.org/technical-updates.325.1046.htm</a>) of which there have been no published results or follow up consultation.</p> <p>Similarly Ed Pepke has not yet release any Findings/Conclusions.</p>
3.4.1	G	<p>2) OCP Process Roadmap Item 3: Is there a problem with inaccurate claims? BACKGROUND ANALYSIS RELEASED.</p>	<p>The timescale for delivery of this was 2014 Q2, Q3. This has not been achieved.</p>
3.4.1	G	<p>2) OCP Process Roadmap Item 6: Will OCP be mandatory...A thorough analysis is performed to identify whether OCP could be implemented on a voluntary or through a risk-based approach.</p>	<p>The timescale for this is 2014: Q3. This is fundamental as it may preclude thousands of certificate holders in having to implement a system. Please provide details of this analysis.</p>
3.4.1	G	<p>2) OCP Process Roadmap Item 7: Is OCP a benefit or a burden? A new version of the CoC Standard is drafted with the aim of dramatically reducing the administrative burden of the FSC CoC. The Draft Standard will include a compiled list of the requirements which would be met through the OCP.</p>	<p>Currently the OCP adds an additional administrative requirement to the Certificate Holder.</p>
3.4.1	G	<p>2) OCP Process Roadmap Item 9: Has my industry been heard? Feedback on OCP through stakeholder Industry Meetings. Feedback is collected from stakeholder on the OCP platform, data security, extent of the problem, cost of implementation, useability, and the need for the OCP.</p>	<p>The timescale for this is 2014: Q2-4 Please provide details of stakeholder meetings to date and a summary of the feedback.</p>
3.4.1	G	<p>If the CH is a small primary processor sourcing from a small number of local certified forests is the 'risk' of a false claim as high as a UK Importer trading in Chinese plywood? The first section should be dedicated to an overview of suppliers and a determination of risk. This would then help both CHs and CBs in (frequency of and ) sampling of transactions.</p>	<p>3.4 Needs to be removed until all elements of the Roadmap and the Statement from the Directors (28.08.2014) have been addressed. FSC should then focus on the specific sector where this problem has arisen and establish a workable solution in that sector before inclusion in the COC Standard.</p>

3.4.1	G	<p>The concern about errors and imbalances in claims should not be addressed through additional requirements for CoC holders. The existing auditing and oversight elements of the COC process is the proper way to deal with these issues. If there are significant concerns, Certifying Bodies should be focussing attention on this topic during audits and handing down non-conformances accordingly.</p> <p>Forcing all CoC holders to do additional auditing and verification is unreasonable and only serves to punish the companies that are following the Standards. The purpose of the audit process is identify issues and ensure they are addressed. If there are persisting concerns about claims, then the focus should be on CBs and audit findings, not compliant CoC holders.</p> <p>Regarding the concern about non-certified companies making FSC claims (example #1), COC Holders are already required to confirm the existence and validity of supplier certificates. Audits should confirm that this is indeed occurring.</p> <p>Regarding the concern about companies not recording their FSC sales (example #2), this is currently within the scope of the existing audit process. There is no need to add another requirement to address this issue.</p> <p>The entire concept of the Online Claims Platform is unrealistic, as is much of the concept of transaction verification. Supplier sources and identification is often considered very proprietary information in North America. Suppliers will be very unwilling to share much of this info with their customers.</p> <p>In regards this this whole issue, FSC seems to be worried about the few exceptions that may exist, coupled with 100% accuracy in 100% of transactions.</p> <p>The focus on the issue should be on dealing with non-conforming companies (single them out and deal with them in a public way as an example if need be), rather than on forcing all conforming companies (by far the majority) to do significant additional work. They should be rewarded for being conformant, not punished with more bureaucracy.</p> <p>In terms of achieving 100% accuracy in 100% of transactions, this seems out of touch. By far, the majority of CoC holders (at least in North and South America) do in fact get the claims and tracking correctly. If there are minor discrepancies, these should not be a reason to force everyone to take on significant new bureaucratic processes.</p> <p>It seems that the root issue may be that FSC does not trust the audit process, or the concept of audits and corrective actions. If this is the case, then the focus should be on the 20-011 Standard and the accreditation process.</p>	<p>Remove the transaction verification requirement. Existing procedures already address the issue.</p> <p>If there are concerns about the scope of CoC holder certificates, FSC should spend some time improving the FSC database and its maintenance, coupled with a focus during audits.</p> <p>If there is still a significant concern regarding claims being changed between CoC holders, consider requiring CB's to audit a percentage of inbound claims during audits, to confirm consistency/ accuracy (i.e., have them contact the seller and check that their sales invoice matches the CoC holder being audited). This would be the most straightforward and least burdensome way to address this concern.</p>
3.4.1		<p>Transaction Verification: This section of the standard is very unclear, and appears to be a continuation of the FSC OCP under a different name. In the development of the FSC OCP, FSC International has stated that implementation of this platform is being driven by false claims in the marketplace, though there has been a lack of information on the part of FSC to support this claim. The OCP process, as proposed, would impose significant costs on certificate holders in an attempt to prevent these alleged false claims. The required documentation within OCP represents a significant increase in data input, requiring significantly more administrative resources throughout the supply chain than the current system. In essence, the costs to certificate holders appear to outweigh the intended benefits of the platform change.</p> <p>There are also concerns around the potential for unintended release or access to sensitive or proprietary information if access is granted to records.</p>	<p>FSC should continue to work with stakeholders that have been active in discussions around the OCP to determine an appropriate path forward.</p>

3.4.1	E	FSC participants cannot legally audit each other's books. This is what we pay 3rd party auditors to do.	Established a system that captures and publishes balances of FSC products observed during an audit so future auditors of other linked customers/suppliers can compare these observations against the same time frame. OCP is too cumbersome and costly plus the many anti-trust concerns that abound from such a system. CBs should derive and manage these checks for compliance not the participants.
3.4.1	G/T	<p>Transaction verification</p> <p>It is not acceptable to have the following paragraph in this or in other FSC- standards:</p> <p>“The organization shall have a mechanism in place to allow the verification that the organization’s recorded FSC input claims match the recorded FSC certified output claims of its suppliers.</p> <p>NOTE: This can be achieved in various ways, such as through the FSC Online Claims Platform (ocp.fsc.org) or other methods. Other methods can include manual verification (e.g. material account records specific to each FSC certified trading partner are made available upon request by the respective trading partner or CB) or other automated systems (e.g. systems with a common record of input and output shared between customer and supplier).”</p> <p>This requirement is against the legal protection of data privacy. This is neither just and reasonable nor feasible. This paragraph obviously is a back door for FSC-OCP.</p> <p>The quoted argumentation to prevent originating errors is pleaded. Selling without valid FSC-certificates is impossible as there is an information if certificates are suspended. Terminated certificates become obvious by checking the expiration date.</p> <p>Generally presuming a totally “black- sheep”-trade without trust and honour is hard to believe and makes companies rethink the decision for FSC.</p>	Delete completely without substitution.
3.4.1	G/T	<p>Transaction verification</p> <p>It is not acceptable to have the following paragraph in this or in other FSC- standards:</p> <p>“The organization shall have a mechanism in place to allow the verification that the organization’s recorded FSC input claims match the recorded FSC certified output claims of its suppliers.</p> <p>NOTE: This can be achieved in various ways, such as through the FSC Online Claims Platform (ocp.fsc.org) or other methods. Other methods can include manual verification (e.g. material account records specific to each FSC certified trading partner are made available upon request by the respective trading partner or CB) or other automated systems (e.g. systems with a common record of input and output shared between customer and supplier).”</p> <p>This requirement is against the legal protection of data privacy. This is neither just and reasonable nor feasible. This paragraph obviously is a back door for FSC-OCP.</p> <p>The quoted argumentation to prevent originating errors is pleaded. Selling without valid FSC-certificates is impossible as there is an information if certificates are suspended. Terminated certificates become obvious by checking the expiration date.</p> <p>Generally presuming a totally “black- sheep”-trade without trust and honour is hard to believe and makes companies rethink the decision</p>	Delete completely without substitution.

		for FSC.	
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3.4.1	G	<p>In principle, verifying that input/output between suppliers/customers is worthwhile to increase credibility, The certification bodies should be allowed to verify whether the input/output claims are correct. Commercial relations between suppliers and customers, put neither in a position to request data on the sales of supplier or check what their customers sell as FSC. Business confidentiality of a companies’ suppliers and customers steps into an area that will be difficult to penetrate.</p>	We propose that this obligation is taken out until a good system is in place.

3.4.1	G	<p>The OCP as it exists in the moment is still on experimental stage and everybody knows about the pending points. So it does not make sense to refer to it. We generally reject the idea of the implementation of any database as the OCP and therefore we reject also any attempts that force organizations into that direction by making any alternative to complicate as long as pending points are finally resolved. The requirements to be met by an alternative verification method are not published yet and therefore they are not available for this draft. This procedure is not comprehensible enough to comment on without the necessary information. The requirements for alternative verification systems must be included in the main/ leading COC standard - not only in a supplementary document for certificate holders, like FSC-STD-20-011. The Transaction Verification is one of the main changes of the chain of custody requirements. It is required to include the requirements for alternative systems of Transaction Verification into the second draft of the CoC standard and to consult it. The mechanism FSC asks for would be based on documents that are not available within the organizations.</p>	Delete chapter 3.4
3.4.1	G	<p>We generally reject the idea of the implementation of any database as the OCP and therefore we reject also any attempts that force organizations into that direction by making any alternative too complicated.</p> <p>The requirements to be met by an alternative verification method are not published yet and therefore they are not available for this draft. This procedure is not comprehensible enough to comment on without the necessary information.</p> <p>The requirements for alternative verification systems must be included in the main/ leading COC standard - not only in a supplementary document for certificate holders, like FSC-STD- 20-011. The Transaction Verification is one of the main changes of the chain of custody requirements. It is required to include the requirements for alternative systems of Transaction Verification into the second draft of the CoC standard and to consult it.</p> <p>The mechanism FSC asks for would be based on documents that are not available within the organizations.</p>	
3.4.1	G	<p>This point is very general. You can work with OCP platform, but can also use alternatives. What are the alternatives? What criteria should meet the alternative audit methods? How often should this be tested? Must be fully tested or is it enough to take samples? Does that mean – under extreme conditions – we have to do a supplier audit? Does the supplier then has to let us have a look at his business papers/records? Would it be sufficient at the end of the year to send a list with those FSC goods to the supplier and he confirms the correctness or makes changes due to his papers? Etc.</p> <p>The verification of proper accounting is the responsibility of certification bodies and not of the customer. We see here a shift of responsibilities.</p> <p>Furthermore this section is like trying to open the back door for the controversial OCP platform. If the Certification Bodies do not recognize the alternatives – especially the manual methods – as reasonable, ultimately only the OCP remains.</p> <p>Also questionable is the fact that the risk criteria (FSC-STD-20-011) will be developed during 2015 – probably after the second consultation for the CoC certification.</p> <p>Whether OCP or alternative automated IT systems – the additional financial burden can not be achieved for small businesses.</p>	This point has to be deleted from the draft until the criteria are described (in this CoC and not in FSC-STD-20-011) and it is possible with minimal extra effort to achieve the desired goal.



3.4.1	G	<p>We generally reject the idea of the implementation of any database as the OCP and therefore we reject also any attempts that force organizations into that direction by making any alternative too complicated.</p> <p>The requirements to be met by an alternative verification method are not published yet and therefore they are not available for this draft. This procedure is not comprehensible enough to comment on without the necessary information.</p> <p>The requirements for alternative verification systems must be included in the main/ leading COC standard - not only in a supplementary document for certificate holders, like FSC-STD- 20-011. The Transaction Verification is one of the main changes of the chain of custody requirements. It is required to include the requirements for alternative systems of Transaction Verification into the second draft of the CoC standard and to consult it.</p> <p>Recommendation: Alternative verification systems must be risk-based. Depending on the risk there should be a 100 % inspection or a small sampling inspection. The risk approach should in particular relate to countries. The criteria could be the corruption index CPI.</p> <p>The alternative verification systems must be pragmatic and applicable. After OCP was not made mandatory it shouldn't be introduced through the back door, because the alternatives are so complex and complicated that there are de facto no alternatives to OCP. This indirect introduction of OCP will cause a lot of reputation damage for the FSC International. Excessive requirements can lead to a series cessation of FSC certifications.</p> <p>The mechanism FSC asks for would be based on documents that are not available within the organizations.</p>	Cancellation
3.4.1	G	good clarification	
3.4.1	G	Good that automated systems are accepted.	
3.4.1	G	In addition to support for the above proposed revisions we wish to express concern for proposed revisions to Part 3.4.1 Transaction Verification. The obligation placed on the certificate holder to match input claims to our supplier output claims will add effort and cost for both parties that we do not believe are necessary. We understand and support the intent of this requirement, but believe that origination errors can be addressed via alternate means, such as making improvements to the accreditations evaluations standards.	
3.4.1	T	<p>CEPI welcomes the intention of FSC to strengthen the FSC system by addressing the issue of origination errors by setting criteria and leaving their implementation to companies using appropriate systems and proportionate to the risk rather than prescribing a one-size-fits all system. However, this should be described in clause 3.4 rather than in a note.</p> <p>Also, CEPI welcomes the introduction of a risk based system that allows companies to choose the system best suited to their operations and supply chain risks. CEPI recognizes that FSC will consult on a document that provides criteria to audit based on risk, scale and intensity. However, we do not agree that the outcome of this consultation will be inserted in the accreditation standard FSC-STD-20-001 but rather the outcome of the consultation should be issued as a guidance document thus still providing an opportunity for organisations to fulfil the requirement in a way best suited to their own operation and supply chain.</p>	New wording for 3.4.1: The organisation shall have a mechanism in place to allow the certification body upon request that the organisation's recorded FSC input claims match the recorded certified output claims. This mechanism should be appropriate for the risk level with respect to the geographic area and sector concerned.

3.4.1	G	This requirement appears to be replacing the auditors employed by 3rd party certification bodies. Certificate holders currently pay for this service and expect that auditors employed by FSC qualified CBs are able to perform the task of verification that transactions do not contain origination errors and when/if they do, corrective actions are taken to prevent this. Putting this expectation on certificate holders to audit their supplier's internal records is not only an unnecessary burden but a duplication of what should already be taking place. It is also an opportunity for confusion as certificate holders would be less qualified to make judgements regarding supplier's records than a qualified auditor should be.	Drop the requirement and focus on improving the audit system to insure the integrity of the FSC standard
3.4.1 + note		Please emphasize the robustness of the verification method further.  Reiterate that this standard must allow some range of options for systems that companies implement for transaction verification, given the diversity of companies. So, OCP should be one method but not the only one allowed.  Note: criteria to assess a robust mechanism will need to be part of the new requirement for certificate holders to demonstrate that FSC input claims match the suppliers' internal records.	3.4.1 The organization shall have a robust mechanism in place to allow the verification that the organization's recorded FSC input claims match the recorded FSC certified output claims of its suppliers. Note: add - only methods that are convincingly robust and transparent will be accepted.
3.4.1.	G	We generally reject the idea of the implementation of any database as the OCP and therefore we reject also any attempts that force organizations into that direction by making any alternative too complicated.  The requirements to be met by an alternative verification method are not published yet and therefore they are not available for this draft. This procedure is not comprehensible enough to comment on without the necessary information.  The requirements for alternative verification systems must be included in the main/ leading COC standard - not only in a supplementary document for certificate holders, like FSC-STD- 20-011. The Transaction Verification is one of the main changes of the chain of custody requirements. It is required to include the requirements for alternative systems of Transaction Verification into the second draft of the CoC standard and to consult it.  The mechanism FSC asks for would be based on documents that are not available within the organizations.	Cancellation
3.4.1.	G	It is critically important to know the risk criteria for the audit requirements to the transaction verification.  FSC should respect the clearly expressed will of a significant amount of its stakeholders against the use of OCP as a mandatory tool.  Even if this is the spirit of the current wording, the fact that alternative options to OCP will be evaluated in an (so far) uncertain way, will just create and unacceptable drive to push for OCP.	
3.4.1	G	This is duplicate effort for companies that have an existing internal tracking process that assures accuracy and ultimately reconcile the input and output material requirement. In addition, there is already an on-site audit process as part of the certification requirement that provides another quality check.	Consider this requirement only for certificate holders who do not have an effective internal tracking process in place.
4	T	Re-introduce 'identification of input', just to keep the standard clear.	4.1(new) Identification of input; 4.1.1 on receipt of material and the invoice, the Organization shall check if the suppliers' sales documents are in compliance with 6.1.1 of this standard.
4	T	The title "4 Material handling" should be "4 Material and product handling" as this section also specifies requirements for product handling. i.e. 4.1.1 Segregation of materials and products.	4 Material and product handling

4.1.1	E	As it is the requirement is vague and not clear.	The organization shall ensure that only eligible inputs are used in FSC certified production and/or to avoid unintended mixtures of materials during production, transport, and/or storage, using a segregation method. Segregation can be achieved by applying one or more of the following methods: a) Physical separation of materials; b) Temporal separation of materials; c) Identification of materials.
4.1.1	T	4.1.1 "Where necessary to ensure only eligible inputs..." New requirement, apparently borrowed from PEFC – why? Don't see the need. It is not the best requirement to borrow (vague – when is it necessary? Who decides when it is necessary?). Also, it adds no value to the FSC standard.	Remove/ clarify.
4.1.1	E	As it is the requirement is vague and not clear.	The organization shall ensure that only eligible inputs are used in FSC certified production and/or to avoid unintended mixtures of materials during production, transport, and/or storage, using a segregation method. Segregation can be achieved by applying one or more of the following methods: a) Physical separation of materials; b) Temporal separation of materials; c) Identification of materials
4.1.1	E	Proposed language is overly complex and prescriptive	Simplify – change to – The organisation shall have a system to ensure that only eligible inputs are used in FSC certified production. Delete rest of requirements
4.1.1	G	Not clear	The organization shall ensure that only eligible inputs are used in FSC certified production and/or to avoid unintended mixtures of materials during production, transport, and/or storage, using a segregation method. Segregation can be achieved by applying one or more of the following methods: a) Physical separation of materials; b) Temporal separation of materials; <i>and/or</i> c) Identification of materials.  Remove red text
4.1.1	G	Not clear	<i>Remove red text</i> The organization shall ensure that only eligible inputs are used in FSC certified production and/or to avoid unintended mixtures of materials during production, transport, and/or storage, using a segregation method. Segregation can be achieved by applying one or more of the following methods: a) Physical separation of materials; b) Temporal separation of materials; <i>and/or</i>

			c) Identification of materials.
4.1.1	T	Shouldn't this language only be applicable to manufacture of only product groups carrying a 100% claim?	Make note of specifically which claims this pertains to.
4.1.1	T	Segregation of materials. What do the 3 methods mean in practice? Why is this part important?	Should this part be removed and then be rewritten in the Transfer system, chapter 7
4.1.1	T	Segregation of materials. What do the 3 methods mean in practice? Why is this part important?	Should this part be removed and then be rewritten in the Transfer system, chapter 7
4.1.1	E	As it is the requirement is vague and not clear.	The organization shall ensure that only eligible inputs are used in FSC certified production and/or to avoid unintended mixtures of materials during production, transport, and/or storage, using a segregation method. Segregation can be achieved by applying one or more of the following methods: a) Physical separation of materials; b) Temporal separation of materials; c) Identification of materials.
4.1.1 c)		Suggest exemplifying to clarify what identification of materials mean	
4.1.1.	E T	1. It is not very clear what is meant by Temporal separation of materials. 2. It makes sense to consider also Quantitative separation of materials in some circumstances, because Physical separation significantly reduces capacity of storage areas as soon as materials with different FSC claims require separate storage space	1. To add in the indicator or in the Vocabulary clarification on what the Temporal separation is. 2. To add in the indicator such a method as Quantitative separation (NOTE: Quantitative separation is applicable when the materials of the same type are stored in one place and allows physical mixture of those materials with a prerequisite of having for the each storage place precise recording of all incoming and outgoing materials with identification of time, volume and FSC claim).
4.1.1.c	E	The term "identification" is misleading in my understanding.	The term "marking" should be used instead!
4.10; p. 9, lines 8-17	G	Clarification	Provide an example of an active certificate that might transfer certificate to another certification body and why they might do this.

4.2.1	E	If there is no b) or other subsequent section within this indicator a) does not make sense.	Delete a)
4.2.1	G/T	Precautions for labelled material It is not reproducible why b) ist deleted	please add: b) material which shall be sold unchanged shall be checked by the organization for being correctly labelled according to its FSC material category unless the organization does not gain physical possession of the material.
4.2.1	G/T	Precautions for labelled material It is not reproducible why b) ist deleted	please add: b) material which shall be sold unchanged shall be checked by the organization for being correctly labelled according to its FSC material category unless the organization does not gain physical possession of the material.
4.2.1	T	This requirement forces to have an agreement with the supplier to keep its label on the product. There's no requirement for this in the Trademark standard. But the main important question is the risk of the company has an authorization to use supplier's label and extrapolate to other products groups. If the CH is certified, it can its label , and provide customer information on the origin of the material, if applicable.	*Remove. At minimum, insert clear rules to the agreement, including the CH can use supplier's label only in its products. Also, check if FSC-STD-50-001 needs actualization.
4.2.1	G/T	It is not acceptable to present FSC-OPC as an option to gather required information that shall be provided to the customer through supplementary documentation	Rephrase 6.1.3 as follows: If the organization has demonstrated an inability to include the required FSC claim as specified in Clause 6.1.1 g) in sales and delivery documents due to space constraints, the certification body can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company's webpage with verifiable product information). In this case, the organization shall demonstrate that the supplementary method conforms to the following criteria: a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the supplementary documentation; b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary documentation; c) In cases where the sales and delivery documents contain multiple products with different FSC claims, each product is cross-referenced to the associated FSC claim provided in the supplementary documentation.
4.2.1	G/T	Precautions for labelled material It is not reproducible why b) ist deleted	please add: b) material which shall be sold unchanged shall be checked by the organization for being correctly labelled according to its FSC material

			category unless the organization does not gain physical possession of the material.
4.2.1	E	If there is only one clause, you should not make it into the form of list. i.e. do not use "a)".	4.2.1 For materials under the scope of the FSC certification that are received with an FSC label, the organization shall ensure that material which will be further processed shall be cleared of any labels or segregation marks before sale, unless the use of supplier's label on the product is covered by specific labelling agreement between the organization and its supplier.
4.2.1	T	Clarification is needed here if this requirement is applicable for companies which do not physically handle materials.	
4.2.1	T	This requirement should not be applicable for cases like followings: 1. Paper distributors who purchase printing paper from paper mills and sell them to printers. The paper package contains FSC label applied by the paper mills. The package is then removed by the printers to be used in printing. This paper distributor cannot remove the packaging as it is a packaging of the product. So the requirement cannot be applied to this paper distributor. 2. Lumber distributors who purchase lumber from sawmills to sell them to other processors. The package contains FSC labels applied by the sawmills. The package is removed by the further processor and the lumber is processed. The requirement should not be applied to this lumber distributor for the same reasons as above. I have seen many cases of the 1st scenario and some cases of the 2nd scenario.	Clarification on applicability of this requirement against CHs who handles material with FSC label but do not apply any physical transformation to the material and only buy and sell these materials.
4.2.1	G/T	Precautions for labelled material It is not reproducible why b) ist deleted	please add: b) material which shall be sold unchanged shall be checked by the organization for being correctly labelled according to its FSC material category unless the organization does not gain physical possession of the material.
4.2.1	G/T	Precautions for labelled material It is not reproducible why b) ist deleted	please add: b) material which shall be sold unchanged shall be checked by the organization for being correctly labelled according to its FSC material category unless the organization does not gain physical possession of the material.
4.2.1	G/T	Precautions for labelled material It is not reproducible why b) ist deleted	please add: b) material which shall be sold unchanged shall be checked by the organization for being correctly labelled according to its FSC material category unless the organization does not gain physical possession of the material.
4.2.1(a)	E	This clause is very poorly re-written. Re-write for clarity so it is easier to interpret and simply include in the original sentence rather than making another clause.	I think I understand this to mean that as a secondary processor, I am required to remove any other forestry conformity assessment scheme labels before sale unless I am using the supplier's label and have a

			labelling agreement. Please revise for clarity.
4.2.1.a	G	Does this requirement only refer to the case when materials are further processed, whereby the label of the supplier will be removed and used for relabeling after the processing? In case the requirement is also related to trading activities of labelled products (either direct sale of packed and labelled products or sale including repacking of products individually labelled on the product itself), the following question arises: Why is a labeling agreement necessary when for example a certified trader sells certified products already labelled with the suppliers label? The supplier uses his own label and is responsible for the approval and correct use according to his own certification procedures which will be audited. This would be additional effort which will be difficult to explain to the companies and to my understanding does not bring any benefits related to the reputation of the FSC COC system.	The requirement should only be mandatory for materials which are processed and re-labeled with the label of the supplier. It should be made clear in the standard, that this requirement will not be mandatory for trading processes of labeled materials!
4.2.1.a	T	Precautions for labelled material Needs clarification, perhaps with an example	
4.2.1.a	T	Segregation marks cannot always be removed and in a lot of cases are not identifying the product as FSC-certified without knowledge of the meaning of the marks (e.g. paint on wood ends, etc.)	Add: using ith FSC trademarks Material which will be further processed shall be cleared of any labels or segregation marks <b>using ith FSC trademarks</b> before sale, unless the use of supplier's label on the product is covered by specific labelling agreement between the organization and its supplier.
5.0 material accounting records	G	Drawing your attention to the still exceptional situation in the Netherlands where we have a relatively high number of FSC-certified contractors (in the building & construction sector, all in all there are approx. 1000 FSCD-certified contractors). The COC-standard does not very well suit the specifics of this group of companies. B&C companies produce a 'finished product' and they are rather assembling entities than producers, meaning that they mainly put finished products together, such as stairs, roof tops, doors, window frames.	In order to promote the certification of B&C companies the COC-standard should (shall J) have an amendment for this category. E.g. for Chapter 5 the material accounting record should be based on projects, the annual summary should be left out (instead have a summary per project) and the conversion factors should be left out as they are not very meaningful for this sector. There are probably more sections of the standard which do not fit very well with the B&C sector. This should be investigated. The proposal is therefore to open the option to have more sector specific standards (or special annexes) and develop these standards (annexes) in close collaboration with experts (B&C companies, CBs)
5.0.0	T	The unit area is missing.	Add the unit area
5.0.0	T	The title only mentions about "material" but this section specifies requirements for products too.	5 Material and Product accounting records and volume control
5.1.0		The FSC Policy of Association and the associated issues with the legality of the ILO language in the US have been well documented. Until this is resolved, US companies cannot agree to this requirement. It is disappointing to see the language in other standards under revision and in the FSC strategic plan when it appears that little progress has been made to permanently address the problem.	Resolve this issue prior to putting in the standard.

5.1.1	G	Material Accounting Records and species requirement. This isn't required unless requested so why make it part of the standard? For paper making, the raw material content can vary in species where pulp is purchased on the open market, therefore the information has a short term accuracy.	Make a differential between timber and paper, where the need for such detail is not so critical and only required on demand.
5.1.1	T	5.1.1. Note Remove Note as this refers to Invoice requirements not record keeping	Delete Note
5.1.1	E	In the draft document, country of harvest requirements have been added to sections 2.2.3, 5.1.1, and 12.2.1. 5.1.1.g is confusing regarding the expectations in maintaining these lists, how and when this information is recorded, and what is required for a material accounting record. The intention of the requirement for a material accounting record is clear in the existing standard (V2.1), but the intention is not as clear in the draft language (V3). In our opinion, material accounting is for incoming loads of fiber and this requirement could be interpreted that each incoming load would need a species list and accompanying country or origin. While the hardwood/pine designation is easy to make, for companies like ours that use wood chipped in the woods, it would be impossible to have a designated species list at the load or even the batch level. We can only maintain a list of all possible species, which has been acceptable under the requirements of the EUTR. If this requirement does apply to incoming documentation, it is unclear if the receiving company would be in conformance if deliveries did not have this accompanying information. The draft 3.2.1 requirement states, "The organization shall have a system in place to confirm that the quantities and FSC claims of the materials received as input for FSC product groups are accurately documented in the purchase and transport documentation from the supplier." Therefore, this may make it extremely difficult for companies to comply.  We do feel species lists are appropriately referenced in 2.2.3e (product group list) and 12.2.1 (Timber Legality Compliance), and so it is unclear why it is also included in 5.1.1.	Delete species list and country of harvest from 5.1.1 and leave it appropriately in 2.2.3 and 12.2.1.
5.1.1	T	Point f) increases and makes reporting more complicated. Share of certified material should be enough, not individual output claims	Deletion
5.1.1	E	This requirement is often misunderstood by companies reading the standard for the first time. They confuse it with 5.2.	Rephrase the requirement so it is clear, that the requirement is about having information available. I think the confusing part is: records of material accounting
5.1.1	T		Include: h) produced products and invoice
5.1.1	E	Same remark than 2.2.3 e, in some case it's not possible to split species by species and add no more value.	Remove requirement about species
5.1.1	T	Countries of harvest information is not always easily available to downstream operations, even when species remains a relevant characteristic of the product. To meet this requirement, Organizations will therefore rely on supplier or sub-supplier declarations of origin with no means of verifying such declarations of origin. Auditors evaluating the material accounting record will then simply be verifying a declaration, and have no means to verify the countries of harvest declarations. The intent of this requirement, therefore loses integrity. FSC should consider the reasonability auditing of this required information regarding country of origin. To be a meaningful part of the Chain of Custody system, such required information needs to be verified as accurate.	Include in the next draft of FSC-STD-20-011 requirements for auditing country of origin declarations within required FSC documents.



5.1.1	G	The same issues as identified in 2.2.3 above apply to 5.1.1. Secondary producers (especially recycled paper mills) do not have access to this level of detail related to species.	Edit 5.1.1 g) as below  g) Species (including scientific and common name) and country(ies) of harvest of input materials, where the species information is commonly used to designate the product characteristics or where required by law.
5.1.1	G	Material Accounting Records and species requirement. This isn't required unless requested so why make it part of the standard? For paper making, the raw material content can vary in species where pulp is purchased on the open market, therefore the information has a short term accuracy.	Make a differential between timber and paper, where the need for such detail is not so critical and only required on demand.
5.1.1	E	"following minimum" And "including" Both means the same.	Remove one of them from the text.
5.1.1	T	<p>There are varying perspectives on how species and country of harvest should be addressed in the FSC Chain of Custody system, and the inclusion of a country of harvest requirement has been added to sections 2.2.3, 5.1.1, and 12.2.1. It is also covered in section 8.1 of FSC-STD-40-005, V.2-1.</p> <p>5.1.1.g here creates a new requirement for certificate holders to record the species name and country of harvest when the "species information designates the product characteristics and/or where required by law." This seems to create some confusion around what certificate holders are required to maintain these lists, how and when this information is recorded, and what is required for a material accounting record. The intention of the requirement for a material accounting record is clear in the existing standard (V2.1), but the intention is not as clear in the draft language (V3). It is difficult to determine from the draft language whether this would be an actual record, a method to ensure that material output corresponds with input, or a combination of records and documents which the company maintains and provides to their customers if requested. If this requirement does apply to incoming documentation, it is unclear if the receiving company would be in conformance if deliveries did not have this accompanying information. The draft 3.2.1 requirement states, "The organization shall have a system in place to confirm that the quantities and FSC claims of the materials received as input for FSC product groups are accurately documented in the purchase and transport documentation from the supplier." Therefore, this may make it extremely difficult for companies to comply.</p> <p>It also seems as though species lists are appropriately referenced in 2.2.3e (product group list) and 12.2.1 (Timber Legality Compliance), and in FSC-STD-40-005(V2-1 and V3-0 draft), and it would be helpful to have clarification around how this information is to be managed in a material accounting record, or if this information should only be available upon request. Additionally, some have expressed that as it is already referenced as a requirement in 2.2.3 and 12.2.1, it is unclear why it is also included in 5.1.1.</p> <p>As FSC Chain of Custody is a global standard it seems as though it should strive to address all timber legality legislation and that it should be included in the standard in the appropriate sections and clarified to clear up the confusion stated above. However, there are also some concerns that by only requiring the species and country of harvest information for some certificate holders, it may be very</p>	<p>Remove the reference to invoice number. Not all invoices have numbers.</p> <p>Species and country of origin should be required in one requirement such as the product group schedule or the supplier's lists (required in FSC-STD-40-004 and FSC-STD-40-005) and not in multiple requirements.</p>

		<p>difficult for organizations further down the supply chain to be able to obtain this information if it's not required for all. Therefore, it may be better to always require this information. However, on the other side there are also concerns about the overall feasibility of this requirement for certificate holders. It may be fairly burdensome for certificate holders to identify country (ies) of harvest input.</p> <p>Lastly, there are concerns about the specific requirements to include invoice numbers as it appears to create even more work where it may not be necessary. The previous clause states invoice references that allow for more flexibility for conformance to the requirement, and do not mandate a specific element for the material accounting record.</p>	
5.1.1	T	<p>We think that using only volume or weight units is not logical, especially when product is made from many different materials (e.g. furniture). Let's say company is purchasing particle board in m3, paper for covering this board (before impregnating it and cutting into pieces) in linear meters, dowels in pieces, veneer in m2, etc. Products (e.g. furniture) are sold in pieces. Usually all norms/conversion factors are calculated also in different units (depending on how raw material was entered into the account system). It is logical that producer will calculate how many dowels will be used for the product (not how many m3 or tons). Now most of the companies try to use second unit in the account system and convert everything to one unit (e.g. m3), however does that make sense? How auditor will evaluate how many dowels are in the store if we will tell him/her that we have some amount in m3? Or let's say we have such amount of m3 of tables in the store?</p>	<p>We would suggest to require record quantities in the accounting system by units which are included in the product manufacturing process description/conversion factors/norms of the company.</p>
5.1.1	E	<p>Badly worded</p>	<p>'The organization shall establish and keep up-to-date records of material accounting for the purchase and sale of materials and products in the scope of the FSC certificate. This should include, as a minimum:'</p>
5.1.1	T	<p>c) Quantities of measure should include weight, volume, area, pieces or any other standard unit of measurement in commerce. d) Material and Product description is vague. Standardize to require the Product Type per the product group list.</p>	<p>c) Revise: "Quantities of measure IE. Pieces, lineal feet, volume, weight etc. d) Revise to Product Type IE. 11.1 -</p>

			Doors
5.1.1 (g) and note	T	Requirement (g) is unclear and new – “where the species information designates the product characteristics and/or where required by law.” AND “Species and country of harvest do not need to be recorded for each invoice, only when this information varies.”	Please clarify this. Does this mean if I ever have a multi-species invoice I need to include scientific and common name on the invoice? That’s a lot of space to take up on an invoice unless it’s required by law – which it’s not in the US. Either it’s required or it’s not. Make it clear and then let us figure it out. Asking an auditor to interpret when species scientific and common names designates the product characteristics sounds like a requirement that will CAUSE auditor inconsistency.
5.1.1 a)	T	“Invoice reference” was changed to “invoice number” which means that the invoice number needs to be recorded which is not common practice in many, especially in small companies. As long as the corresponding documents are clearly linked and identifiable, other references like order number should be accepted. It would allow more flexibility without higher risk to focus on “sales and purchase documents” instead of insist on an invoice.	Change “invoice number” to “unique purchase document reference”
5.1.1 a) and b)	T	Keep 5.1.1 as in the previous version of the standard. References are enough	Delete current a) and b)  and replace with: a) invoice references b) Quantities by .... etc..
5.1.1 a) and b)	T	Keep 5.1.1 as in the previous version of the standard. References are enough	Delete current a) and b)  and replace with: a) invoice references b) Quantities by .... etc..
5.1.1 a) and b)	T	Keep 5.1.1 as in the previous version of the standard. References are enough	Delete current a) and b)  and replace with: a) invoice references b) Quantities by .... etc..
5.1.1 c)	T	Square meters should be added as additional unit for the paper industry.	c) Quantities by volume, weight <b>or square measure</b> . If information on volume, weight <b>or square measure</b> is not available (e.g. for traders) the number of pieces.
5.1.1 c)	T	Square meters should be added as additional unit for the paper industry.	c) Quantities by volume, weight or square measure. If information on volume, weight or square measure is not available (e.g. for traders) the number of pieces.
5.1.1 c)	G	Page 18 - Footnote 2 Including the explanation directly in the standard on how to treat certified material obtain prior to initial certification was a good idea.	None
5.1.1 c)	T	“Quantities by volume or weight” is an unnecessary limitation. All commonly used quantity units should be accepted.	Rephrase to “Quantities by commonly used units (e. g. volume,

			weight or pieces).”
5.1.1 c)	T	Square meters should be added as additional unit for the paper industry.	c) Quantities by volume, weight or square measure. If information on volume, weight or square measure is not available (e.g. for traders) the number of pieces.
5.1.1 c)	T	Square meters should be added as additional unit for the paper industry.	c) Quantities by volume, weight or square measure. If information on volume, weight or square measure is not available (e.g. for traders) the number of pieces.
5.1.1 d)	G	Clarify “material and product descriptions”. For many companies, the product list could be very extensive. Example: tracking “Douglas-fir lumber” is do-able, but tracking all the various dimensions, lengths, etc. is not reasonable. Tracking of inputs and outputs should only be required for certified and Controlled Wood products. Non-certified and CW products should clearly be excluded from these requirements.	Keep the Material Product descriptions in line with the “Product Groups” definition.
5.1.1 g)	T	This is the responsibility of the supplier	Should be available on simple request
5.1.1 g)		does “required by law” only refer to the country where it is produced? What if a product is exported to Europe?	
5.1.1 g)	G	Clarify this requirement, especially in regards to “and/ or required by law”. While this may be a EUTR requirement, for companies that are removed from the log stage of the business, it can be difficult/ impossible to state the country of harvest (e.g., pine MDF moulding – the original fibre could be from anywhere almost).	
5.1.1 g)	T	There are efficient ways of CH demonstrate input material’s species and countries of harvest, other than stating this on product list or material accounting record.	Delete.
5.1.1 g)	T	This bullet point needs to be divided into two sections as it addresses two very different subjects regarding the actual product characteristics and also the origin of supply. It would be helpful to somehow cross-reference this to section 12.2.1 page 35. It would be helpful to have a note to state current EUTR requirements, e.g. that Operators must maintain this information (through a due diligence system) but traders are not required to (only to keep records of supplier and customers).	e) The species (Inc..) and country(ies) of harvest of input materials, where the species information designates the product characteristics. f) The species (inc..) and country(ies) of harvest of input materials where required by law.
5.1.1 Note	T	The language is not clear. The sentence looks grammatically incorrect. Intention not understandable easily.	Please make clear about the intention of the note.
5.1.1.	T	Invoices are not universally used, and has different meanings in different circumstances.	Replace invoice with transaction a) Transaction number and date
5.1.1. (g)	T	There are cases when a mixture of several coniferous species get delivered and accepted at the Mill with a common name “Coniferous material”. From technologic point of view there is no need to deliver and accept those species separately as soon as they have similar characteristics. However, for each harvesting site there is a forest taxation data available, which contains precise composition of species growing there. In other words we can without any doubts say what is the full list of tree species growing in the wood procurement region.	To add a NOTE clarifying that it is possible to have deliveries of several tree species as a mixture if it is possible to provide a specific list of tree species, which can appear in this mixture.
5.1.1. c)	T	Some products (e.g. decorative paper, HPL) are trade in square meter.	Quantities of materials (e.g. volume or weight or other units)
5.1.1. c)	T	Square meters should be added as additional unit for the paper industry.	c) Quantities by volume, weight or square measure. If information on volume, weight or square measure is not available (e.g. for traders) the

			number of pieces.
5.1.1. f)	T	Point f) increases and makes reporting more complicated. Share of certified material should be enough, not individual output claims	Deletion
5.1.1. f)	T	Point f) increases and makes reporting more complicated. Share of certified material should be enough, not individual output claims	Deletion
5.1.1. f)	T	Point f) increases and makes reporting more complicated. Share of certified material should be enough, not individual output claims	Deletion
5.1.1. g)	T	Information requirements by law concern any products and product groups, not just FSC product groups. It is unnecessary to duplicate that kind of requirements here.	Deletion of "and/or where required by law." and Deletion of the NOTE
5.1.1. g)	T	Information requirements by law concern any products and product groups, not just FSC product groups. It is unnecessary to duplicate that kind of requirements here.	Deletion of "and/or where required by law." and Deletion of the NOTE
5.1.1. g)	T	Information requirements by law concern any products and product groups, not just FSC product groups. It is unnecessary to duplicate that kind of requirements here.	Deletion of "and/or where required by law." and Deletion of the NOTE
5.1.1. the NOTE	G	I am not happy with the message that "species and country of harvest do not need to be recorded for each invoice, only when this information varies", because clients may use the shipment and mix it with other shipments with FSC claims and then have to pass on information on species and country of harvest. Without such information on each invoice this may become difficult. The additional administrative burden for the supplier may be much less than that saved for the client?? Also: even if the species and origin does not differ it would be useful, and compliant with the DDS requirements of EUTR, to at least require updating the information once a year.	"NOTE: Species and country of harvest need to be recorded on each invoice, to facilitate possible due diligence obligations of the client and/or clients further down in the supply chain"
5.1.1.c	T	5.1. Material accounting records Some products (e.g. decorative paper, HPL) are trade in square meter.	Quantities of materials (e.g. volume or weight or other units)
5.1.1.c	T	The opportunity of using alternative units is missing.	The provision of using alternative units should be possible, e.g. area (sqm).
5.1.1.c	T	Square meters should be added as additional unit for the paper industry.	c) Quantities by volume, weight or square measure. If information on volume, weight or square measure is not available (e.g. for traders) the number of pieces.
5.1.1.c	T	Square meters should be added as additional unit for the paper industry.	c) Quantities by volume, weight or square measure. If information on volume, weight or square measure is not available (e.g. for traders) the number of pieces.
5.1.1.e	T	It can be useful to only have to record the FSC claim instead of the material category, especially when combining materials with different FSC claims using the transfer system (see table E).	Add: and/or FSC claim e) Material category <b>and/or FSC claim</b> of inputs;
5.1.1.g	T	There are efficient ways of CH demonstrate input material's species and countries of harvest, other than stating this on product list or material accounting record.	Delete.
5.1.1.g	T	Why is this here? What does it add to 2.2.3 e)?	Remove.

5.1.1.g	T	There are efficient ways of CH demonstrate input material's species and countries of harvest, other than stating this on product list or material accounting record.	Delete.
5.1.1.g	E	Please clarify clearly that country of harvest is also only required if required by law. We often have a whole list of countries of harvest, which is difficult to attach each time.	This obligation should only apply when required by law (for example EU Timber Regulation at import, US Lacey Act)
5.1.1.g	E	It is unclear how this requirement must put into practice. It raises questions like: Which laws? When is it required by laws? It is the sentence where the species information designates the product characteristics and/or where required by law determining both the information about species AND country of harvest or only the species requirement which is actually mentioned in that sentence. The note indicates that the information about country of harvest and species must be recorded for some invoices at least – what does this “recorded for” mean in practice? That the information must be on the invoice itself or documented otherwise?	This requirement should be elaborated and explained better.
5.1.1.g	T	We will be unable to comply with this requirement on an invoice or within our accounting system. This cannot be worked into a system and must be allowed as an additional document available upon request linked to the product OR producing facility the same way that current wording exists for invoices.  It is not possible to accommodate for species wording on an individual product basis. Any paper carries up to 20 given species and character size limits do not allow for this to be in place on a material accounting record basis. Species lists are made available upon request as EUTR requires. Species is not a defining characteristic of paper products.	Re-phrase Note below OR remove 5.1.1g
5.1.1.g	G	I have several comments on this, see below. But the first question is to what extent this is overlapping with 12.2.	
5.1.1.g	G	The country of harvest should only be required if required by law. Similarly, species identification is also addressed in these legal structures sometimes permitting general species identification rather than specific subspecies identification. For example, there are 24 species of maple in Canada, and only 4 are commercially a significant industry segment. When the species are mixed in the log yard, which veneer winds up in a particular panel is impossible to determine. Compliance with those laws should be accepted as equivalent to the FSC requirement. Companies often have a whole list of countries of harvest, which is virtually impossible to determine in an engineered product such as hardwood plywood or engineered flooring.	This obligation should only apply when required by law (for example EU Timber Regulation at import, US Lacey Act)
5.1.1.g	G	The country of harvest should only be required if required by law. Similarly, species identification is also addressed in these legal structures sometimes permitting general species identification rather than specific subspecies identification. For example, there are 24 species of maple in Canada, and only 4 are commercially a significant industry segment. When the species are mixed in the log yard, which veneer winds up in a particular panel is impossible to determine. Compliance with those laws should be accepted as equivalent to the FSC requirement. Companies often have a whole list of countries of harvest, which is virtually impossible to determine in an engineered product such as hardwood plywood or engineered flooring.	This obligation should only apply when required by law (for example EU Timber Regulation at import, US Lacey Act) Strike “where the species information designates the product characteristics” as this disadvantages solid wood over composite wood and paper which are not held to this standard (but in the quality of paper supplied, species counts just as much as it does in a cabinet set, but the properties are not visual, they are physical (paper grain, weight, etc...))
5.1.1.g)	E (but see below, in fact I want a much more far-reaching change)	Order in sentence is confusing, as it is covering two different issues, species and origin.	“Species (including scientific and common name), as far as the species information designates the product characteristics and/or where required by law, and country(ies) of harvest of input materials”

5.1.1.g)	G	I do not think that “required by law” is sufficient to link it to legality legislation. Because the legal requirement is only relevant to some actors in the supply chain (the “operator” in the EU), but they need the companies up in the supply chain to already supply the information. And as in many cases a forester and/or early supply chain actor may not know beforehand where the end product may land, I propose to make it a more general requirement	“All species (including scientific and common name) and country(ies) of harvest of input materials”.
5.1.1.g)	G	5.1.g should be a more general requirement. Explicit allowance should be made for species groups or a list of possible species that may be in a product. This is of particular importance for pulp & paper products that could contain just one or all of the species that are ordinarily sourced by a mill.	
5.1.1.g)	T	The requirement to keep species records for all sales should only apply to products to be sold in the EU. Requiring the maintenance of species records for all products with FSC claims, including CW, is unnecessary to the integrity of the COC. The Scope statement in this Standard states, “The objective of this standard is to provide the MINIMUM management and production requirements for chain of custody organizations....” This additional work for CHs for products that do not end up in the EU serves no purpose.	Change 5.1.1.g or modify the Note below it to exempt product not destined for the EU.
5.1.1a)	T	In the OCP, the term “transaction identifier” is used. Consistency is needed to avoid confusion.	a) Transaction identifier (e.g. Invoice number);
5.1.1c note 2	G	This has been a long time question of many companies. The guidance was previously in a different document. It is better suited where organizations applying for certification can see this guidance.	None
5.1.1d)	T	it is always not clear what “description” means. Is product name alone sufficient?	Clarification on what exact information is needed as “description”.
5.1.1g		Why is this required? It’s just going to complicate things even more so.	
5.1.1Note	T	This note is highlighting information about invoices. 5.1.1 is about a material accounting records that link a tracking system together. This note could be better worded.	Note: Species and country of harvest can be recorded via a singular item within material accounting records or as an addendum to accounting records.
5.1-5.3	G	Rainforest Alliance has concern over the complexity of developing conforming Annual Volume Summaries with all required information. In the previous volume summary requirement, NCRs are frequently issued due to minor problems in formatting which do not affect the integrity of FSC claims or the ability of the CB to validate volume records. Many companies spend significant resources preparing an annual volume summary, which is then reviewed by the CB and filed. Similar statements can be made on review of the conversion rationale required in 5.3 We suggest that the focus of the audit be placed on evaluating the material accounting record and the accuracy of conversion rationale. This focus will better address issues of inflated volumes being claimed as FSC certified.	Rainforest Alliance would like to suggest the following: <ul style="list-style-type: none"><li>• FSC to add emphasis on the material accounting record requirements</li><li>• FSC to simplify the volume summary requirements (remove requirements c and d that are currently proposed because they are covered in material accounting requirements)</li><li>• Ensure proper evaluation and methodology for conversion factors. This can be done by FSC providing a tool for auditors when evaluating this requirement and a requirement for a standard unit of measurement to be used.</li></ul>
5.2.0	G	Remove the need for an annual report. It does to my opinion not contribute to getting control over FSC wood flows in the market	
5.2.0	E	Is “VOLUME summaries” the adequate term?	Eventually rename to “QUANTITY summaries”

5.2.1	G	<p>These should be annual, Calendar summaries due at year end for CBs to create their FSC fiber volume reporting by species to ASI to track cheaters.</p> <p>We are all prepared to generate reports, generating an annual and perhaps one other for an oft timed audit is not overly burdensome if it afforded us an additional tool to address cheating through oversight by ASI and CBs.</p> <p>The reporting should be “temporally aligned” so FSC IC can complete analysis on macro metrics of wood use year over year.</p> <p>This data could help FSC route out cheaters without devolving to tracking every transaction which is not commercially feasible.</p>	<p>Change to read: The organization shall prepare annual volume summaries for each calendar year of operation.</p> <p>In certain cases, a second set of annual volume summaries, schedules may be used to accommodate audits may be requested at the convenience of the certification body.</p>
5.2.1	E	Annual volume summaries	Clarify if these are calendar-year summaries or some other 12-months period such as a tax or fiscal year.
5.2.1	G	<p>Good!</p> <p>It is important that organizations can produce the annual volume summaries at calendar annual basis, jan-dec.</p>	
5.2.1	G	<p>Good!</p> <p>Important that organizations can produce the annual volume summaries at calendar annual basis, jan-dec.</p>	
5.2.1	T	<p>It should be made clear that the starting date of the period can be decided by the company and does not have to be the same as calendar year. This is a question auditors often get from CHs. Giving an example to align the period with the fiscal year of the company may make things much clearer for CHs.</p>	
5.2.1	T	<p>“ANNUAL volume summaries” could be misleading and was often interpreted as calendar year. Good to have it defined now for the “period since last annual volume reporting period”.</p>	<p>It might be helpful to add a note that the period can be chosen by the certified company (not necessarily calendar year).</p>
5.2.1.	T	<p>It is not clear when should be the start of the annual reporting period. Some auditors consider it as a first day in a calendar year, while others consider it as a first day of the CoC certificate validity.</p>	<p>To add a NOTE clarifying what is the appropriate starting date of the annual reporting period. For companies it is always more comfortable to link to the calendar accounting year (i.e. from Jan 1 to Dec 31).</p>
5.2.2	G	<p>There is insufficient information to understand how a company will “demonstrate” the quantities produced or sold. We are currently required by our CB to show data relative to inputs and outputs, but the level of detail required for the architectural millwork community could be onerous and cost prohibitive.</p>	
5.2.2	G	<p>Be careful because between purchase and sell you can have physical inventory and rolling credit and in some case you can sell more than you purchase !!!</p>	<p>There not add value to produce an annual summaries : it’s a new requirement with no value and more tasks and cost for company !!!</p>
5.2.2	G	<p>Not clear why this requirement is included in the standard. This has to be checked by the CB and if quantities or FSC claims are not consistent, this is the first indication that something might be wrong. Company shall only ensure that data in volume summary corresponds to the accounting system. We think, that mentioned summary as such is not a tool for ensuring that correct FSC claims are used, or volumes corresponds to the conversion factors.</p>	<p>We would suggest to avoid requirements, which do not give any added value.</p>



5.2.2	G	The addition of the claim period/ job order and the records of control system turn the volume summary into a census of all transactions for the year. This will be extremely onerous to companies and defeats the purpose of completing the summary and using an audit process. If there are concerns about FSC credit balances or inventories, then the focus should be on the audit process, not additional bureaucracy.	Clarify that the volume summaries only apply to certified and Controlled Wood transactions. Remove sections c) and d).
5.2.2 und 5.2.3	T	To compare input and output ratio, the quantities have to be in the same quantity unit.	Add: Input and output quantities have to be presented in the same quantity unit.
5.2.3	G, T	Points e) and f) are irrelevant under the credit system as the certified inputs and outputs are on the credit account and the stock is virtual.	Deletion
5.2.3	T		Include: h) conversion factor Use the same measurement unit or a compatible unit
5.2.3	T	We do not see the purpose/intention behind requiring c. the applicable claim period or job order or d. record of the control system used. These are two items that are audited as part of the material accounting record. The volume summary is intended to demonstrate more volume was purchased than sold. We struggle to see how the information can be summarized when requiring these new criteria, especially C.	Remove these new requirements c and d as they are redundant with the requirements of 5.1.1.
5.2.3	G	Some companies have problems with CBs/auditors that do not understand that inventory difference occurs in terminals or other storage areas.	Could this issue be described here or in the accreditation standard (FSC-STD-20-011)
5.2.3	G	Some companies have problems with CBs/auditors that do not understand that inventory difference occurs in terminals or other storage areas.	Could this issue be described here or in the accreditation standard (FSC-STD-20-011)
5.2.3	T	d) is an background data and should not be included in a "Summary". If CHs start including all percentage calculations and credit calculations, it is no longer a summary.	Remove d). Auditors will need to check the percentage and credit calculations anyway according to 5.2.2.
5.2.3		Why change the requirements for the volume summary? The current version capture the relevant information – inputs, outputs and items still in stock. For item C, the volume summary is already for a known period, why add more dates? If they are required for reach interaction, then the list will be thousands of entries long. For item d, as a printer we operate strictly within the transfer system. This would be an un-needed addition.	Removal of items C & D as they are redundant.
5.2.3	T	We think that FSC control system shall be included in the annual volume summary. This can be checked by other means: e.g. indicated in FSC Product Group Schedule. Also we think that indicating claim period or job order is not necessary. Including this information might make volume summaries just become a copy of accounting system. Imagine retailer using Transfer system and selling a lot of products which almost each day has different order number. Its volume summary might be hundreds of pages.	We would suggest to withdraw the requirement for including claim period into the annual volume summary. Instead, for Percentage and Credit Systems, data could be shown by each claim period (e.g. if company has 3 months claim period, then data about purchases, sales, etc. are also shown apart using 3 months periods).
5.2.3	T	A volume summary can also meet the intention of the criteria if it is done by articles (eg. trader of finished products), instead of "job order".	Allow annual volume summaries by articles in addition to "claim period and job order".
5.2.3 c)	E	We are unsure of why this is needed as it is not part of the mass balancing that is required for annual volume summaries.	We would propose deleting Clause 5.2.3 c) Applicable claim period or job order.

5.2.3.,e ) and f)	G, T	Points e) and f) are irrelevant under the credit system as the certified inputs and outputs are on the credit account and the stock is virtual.	Deletion
5.2.3.,e ) and f)	G, T	Points e) and f) are irrelevant under the credit system as the certified inputs and outputs are on the credit account and the stock is virtual.	Deletion
5.2.3.,e ) and f)	G, T	Points e) and f) are irrelevant under the credit system as the certified inputs and outputs are on the credit account and the stock is virtual.	Deletion
5.2.3.,e ) and f)	G, T	Points e) and f) are irrelevant under the credit system as the certified inputs and outputs are on the credit account and the stock is virtual.	Deletion
5.2.3.,e ) and f)	G, T	Points e) and f) are irrelevant under the credit system as the certified inputs and outputs are on the credit account and the stock is virtual.	Deletion
5.2.3.,e ) and f)	G, T	Points e) and f) are irrelevant under the credit system as the certified inputs and outputs are on the credit account and the stock is virtual.	Deletion
5.2.3.c	G	There is no requirement for 'an applicable claim period or job order' statement under the Transfer method. Or are FSC trying to introduce such 'shelf life'?	Remove this detail as not applicable for the Transfer method.
5.2.3.c		5.2.3 c) applicable job orders: might be several ten thousands of job orders (e.g., invoice numbers in the case of large trading organizations). Are these all have to be recorded in a summary?	
5.2.3.c)	G	There is no requirement for 'an applicable claim period or job order' statement under the Transfer method. Or are FSC trying to introduce such 'shelf life'?	Remove this detail as not applicable for the Transfer method.
5.2.3.d	G	Unclear what that means! Does this mean that there has to be a record included in the annual volume summaries which indicates which control system was used, or does this mean the annual volume summaries have to be directly linked to the credit accounts or percentage calculation tables?	Rephrasing of the point d) with clear description of the requirement!
5.2.3.e & f	G,T	Points e) and f) are irrelevant under the credit system as the certified inputs and outputs are on the credit account and the stock is virtual.	Deletion
5.2.3d	E	Missing reference to the transfer system?	(e.g. transfer, credit account, percentage calculations)
5.3.0	T	5.3 "Conversion factor" This term has always raised confusion because of the similarity with conversion factor that change inches to metres, etc. Another expression should be chosen, such as waste factor or production ratio.	Adopt another expression, such as waste factor or production ratio.
5.3.0	G	Conversion factor : for example why in sawmill Coc we can keep water in product and add it on credit and for example for paper we need to remove water, bark, lignin and keep just cellulose !!! If we purchase 1 ton of wood (with 50% of water, 14% of bark and 25% of lignin) we can use at the exit 1 ton of FSC and not 0.25 ton cellulose FSC.	
5.3.1	G	Conversion factors should be reviewed at year end and implemented on January 1. There should be more structure built around conversion overall, especially as it relates to scaled log conversion from local roundwood scaling methods to Cubic meters.	Place a calendar date requirement in the standard, get folks on an annual rhythm of reporting conversion adjustments, just like the financial world does with financial statements.
5.3.1	T	Conversion factors are very useful when there is standard product processing. In custom product processing, the conversion factor is always unique per job order. This way it has no use for the control of volume to determine the conversion factor for every job order. Only for the purpose of auditing it can be useful to have the records that makes it possible to calculate the conversion factor.	Change: For each product group, the organization shall identify the main processing steps involving a change of material volume or weight and <b>keep records making it possible to specify the conversion factor(s) for each processing step or, if not feasible, for the total processing steps. For standard product processes, the conversion factors shall be specified and kept up-to-date.</b>

5.3.1	T	Last sentence "the conversion factor shall be kept up-to-date."	What defines up-to-date – monthly? Quarterly? Annually? By the claim period? Please specify what is meant by up-to-date.
5.3.1	T	Is there a need for several conversion factors within one site and product group?	Change the text ...for each processing step, if not feasible or practicable...
5.3.1	T	Is there a need for several conversion factors within one site and product group?	Remove the text ...for each processing step, if not feasible.....
5.3.1	T	This requirement should be split into two separate requirements. Having two different requirements in one clause will cause problem of "partially addressed CAR".	"The conversion factors shall be kept up-to-date." Should be separated and should be 5.3.2.
6 + 6.1.3	T	In some clauses it says „all“ delivery documents need specific information and in other clauses this is made void.	Eliminate this contradiction
6.0 sales documents	G	Proposed change: Sales documents could be electronic. Observation: It is not mentioned that most of the business documents today are electronic. To require paper documents would make it more difficult without adding any more safety for infringements. It is instead the opposite. Electronic handling will make it more difficult for fraudulent behavior and it is in line with the mantra that almost every political ambition Has ; Simplification.	
6.0.0		This section is unnecessarily prescriptive. This can be addressed in section 3.2.1. As long as company can credibly transfer the claim information in a manner that satisfies the business needs of both trading partners that should suffice. Data requirements above this are unwarranted. There is recognition of this in section 6.1.3 and allowance is made for variations in IT systems. This should be simplified.	
6.1.0	T	Are sales documents the same thing as "Output claims" referred to in 3.4.1.?	Request for definition and clarification.
6.1.0	T	There are no specific requirements for interim invoices which are commonly use by construction organisations. With these interim invoices it is often difficult to determine how many products exactly are produced of delivered at the construction site. Therefore it now expepted by CB's to state that FSC certified products were produced or delivered but that the total quantity and the "end" claim is stated on the last and final invoice.	Add: If the organisation uses interim invoices, these invoices may state that the products are produced and delivered under the scope of the chain of custody certificate and that the quantity and FSC claim will be stated on the last and final invoice only.
6.1.0	T	The title does not match with the content.	The title should be: Requirements regarding sales and delivery documents issued for FSC certified products
6.1.1	G	Examples of "alternative evidence"	Move footnote 3 from Page 19 to Page 18 where the clause is
6.1.1	E	6.1.1 Table C Table is informative and not a normative requirement.	Move table to an appendix/annex
6.1.1		Footnote 3. In cases where systems of Electronic Data Interchange (EDI) are employed and no written invoices are issued, alternative evidence shall be provided to demonstrate the FSC status of supplied products equivalent to the information as required by 6.1.1.	It should be added that there exist processes, in which a written invoice still exist, however is not checked by any instance anymore. These bills are immediately scanned and archived. Until now, the auditor always mentioned that in those cases all bills must be checked for FSC purposes. However this contradicts modern operating procedures. Also in those cases the checkup should be limited to other evidence, such as delivery notes for example.

6.1.1	E	Put requirement g before e, because each product has a claim (can be one claim for all, for each product it needs to be determined)	a. Name...organisation b. Name... customer c. Date.... d. Description of the end product; e. Clear indication of the FSC claim.... f. Quantity... g. ... FSC certificate code....
6.1.1	T	The reference to the word "all" sales documents contradicts section 6.3.1, because here exceptions were made.	1st sentence skip the word "all"
6.1.1	T	Add clarification on whether the claim on the invoice shall be replicated exactly as it appears in the standard or whether it can be written in different ways eg. FSC Mix, FSC MIX, FSC mix etc.	Add appropriate clarification
6.1.1	T	Does not provide product identification from communities and small producers, as provided in FSC-ADV-50-003 V1-0 of January 19, 2012. The inclusion of this is essential for the traceability of this type of product. Note that this ADV was created in the context of implementation of the motion 19, adopted at the General Assembly of 2008, which aims to improve access to market these products. See text of the motion below:  FSC shall develop a strategy to differentiate community forest products* from other products, that allows a phrase like "COMMUNITY ORIGIN PRODUCT", in the claim on the FSC product. The strategy shall include all relevant aspects of Chain of custody and labeling to guarantee product traceability. In the same direction the current proposed FSC Strategic Plan has clear objectives and goals of "creating social value" for certification, through the increase of certified forest area under management of communities and small farmers, especially in natural forests in the tropics. (See GLOBAL PRIORITY 01 Objective 1.1, indicator 1.1.1).  • About the Note: The unfinished product is for the CH or for the COC? For example, panel can either be a finished product for the construction industry as raw material for furniture. If a dealer can receive and sell product with incomplete Claim, how would it know the correct threshold for labeling? And if the product is input to another system for controlling FSC Claims, like % or credit? The text was clear before.	Include ADV-50-003 V1-0 from January 19 2012 2.2 for identification of products from Community and small producers in invoices considering decisions based on requirement 3.2.2
6.1.1	T	Keep the claims simple !! stick to one claim !! No consumer knows the difference between the different claims	FSC material
6.1.1	G	The requirement says 'all sales and delivery documents' which can cause unnecessary work without any value add.	The requirement should be intending to meet the intention of this clause – being able to identify certified material as such at any time and up to five years after the transaction. The 'all' then should be removed.
6.1.1	T	6.1.1 Note 2nd sentence Here a clarification might be needed: Does the new version mean that if a product is sold with just "FSC Mix" or a "FSC Recycled" claim an FSC certified buyer can transfer this claim to the output? With other words the claim can be transferred, but the input claim cannot be used any more for percentage or credit calculations? We would favour such a meaning, as there are retailers that omit percentage or credit indications but sometime sell to resellers.	In this case, however, the subsequent organizations in the supply chain are no longer able to use these products for their own percentage or credit calculations, but can transfer the simplified Mix or Recycled claim to their output and resell the products with an FSC claim.

6.1.1 (g)	T	“Note: For supplies of finished and labelled products, the organization may omit the percentage or credit information...” What credit information are you talking about? There is no credit information – it is simply FSC Mix credit.	What exactly is “credit information”? Does this simply mean organization can state “FSC mix” and not include credit or percentage? Clarify.
6.1.1 and 6.1.2	G	Loggers and wood dealers are required to have certification in North America often do not have invoice documents or their own shipping documents. Shipping documents are not required in many areas within the US. Currently documents are managed by the certified receiving mill. Wording exceptions should be provided for situations where invoices and shipping documents are supplied by the buyer in a mutually agreed upon transparent and accurate system.	Amend to 6.1.1 and 6.1.2 to allow for mill managed receiving and scaling documentation from initial logger link in supply chain. Allow for logger/supplier documents to be considered low risk at an audit.
6.1.1 b)	T	Address of customer is usually (90% of all cases) not included due to Japanese business custom. Flexibilities should be allowed as long as the specific customer can be identified.	b) Information to identify the customer such as name and address of the customer;
6.1.1 d)	T	The term “description” is not clear enough to explain the intention of the requirement here. Is product name alone sufficient? Product specification also needed? I believe many CHs and even auditors do not really understand the intention of this requirement.	d) Description of the product sufficient to identify the specific product such as product name. Note: When there are different product with the same product name, then the product name alone is not sufficient description to identify the product and so additional information to identify the product is needed (e.g. species name, grade et).
6.1.1 Note	T	Why does it have to be labelled product? According to V2-1 (current standard), it does not have to be actually labelled as long as it meets the labelling requirements. I believe we should not make any unnecessary changes which affect CHs in a negative way. If it has to be changed, a clear and convincing reason must be provided.	Remove “and labelled” from the text.
6.1.1 table C	G	Perhaps I am not understanding correctly, but the millions of envelopes bearing the FSC logo say ‘FSC MIX Envelope from responsible sources’. There is no mention of Credit or x%. So the retailers are using the escape clause at the end of the Note just above table C.	The escape clause seems to eliminate any incentive to increase the percentage of certified material. Is that intentional? That seems to be contrary to Objective 1.1 in the draft FSC global strategy v2-1.
6.1.1, 6.1.2, 6.1.3	T	Retailers often do not have the name or address of their (shop) customer Therefore it is not possible to include this information in sales documents.  Furthermore, it is often not possible to include the FSC certification number or a FSC claim in sales documents because of limited space. The customers should be able to identify the responsible supplier or the FSC claim due to the FSC on product label or by contacting the retailer.	Please specify the clauses by adding a note for retailers that if it is not possible, they do not have to put a licence number or certification code or FSC claim on all sales documents for end customers.
6.1.1, 6.1.2, 6.1.3	T	Retailers often do not have the name or address of their (shop) customer Therefore it is not possible to include this information in sales documents.  Furthermore, it is often not possible to include the FSC certification number or a FSC claim in sales documents because of limited space. The customers should be able to identify the responsible supplier or the FSC claim due to the FSC on product label or by contacting the retailer.	Please specify the clauses by adding a note for retailers that if it is not possible, they do not have to put a licence number or certification code or FSC claim on all sales documents for end customers.
6.1.1.b	T		Reference that can identify Name and address of the customer
6.1.1.b	T	Add; or reference that can identify the name and address of the customer	b) Name and address of the customer or reference that can identify the name and address of the customer
6.1.1.footnote	E	What is the alternative evidence – this is not clear enough, what are the minimum requirements for alternative evidence.	Please define minimum requirements for alternative evidence, e.g. regular reports, summaries, confirmations.

6.1.1b)	T		Reference that can identify Name and address of the customer
6.1.1b)	T		Reference that can identify Name and address of the customer
6.1.1b)	T		Reference that can identify Name and address of the customer
6.1.1b)	T		Reference that can identify Name and address of the customer
6.1.2	G	6.1.2 and 6.1.3 Inclusion of Claim Information on Shipping Documents: It is an unnecessary burden to require information on claims on shipping documents in addition to what has already been reported to customers via invoices.	When shipping documents can be linked to invoices, there is no requirement for claim information to be required on the shipping documents.
6.1.2	G	Simplification and clarification of requirement	Rewrite 6.1.2.- delete all sections except. The delivery documentation shall include information sufficient to link the sale and related delivery documentation to each other.
6.1.2	G	The requirement to include all information on the delivery documents is an unnecessary administrative burden. A general exception should be made such that, so long as there is sufficient information to link the invoice with the shipping documents, the shipping documents do not have to contain the claim information.	
6.1.2	E	Delivery documentation should be Delivery document to be consistent with terms and definitions.	
6.1.2		For record keeping purposes, would an automated excel spreadsheet from suppliers (that is sent to one contact) that is automatically generated be sufficient? This would be sent to the trademark contact within the organization who would maintain the record keeping.  This method is extremely helpful with the amount of deliveries – sometimes 2 a day - that can be completed at any of our locations across Canada.	
6.1.2 & 6.1.3		It is an unnecessary burden to require information on claims on shipping documents in addition to what has already been reported to customers via invoices.	When shipping documents can be linked to invoices, there is no requirement for claim information to be required on the shipping documents.
6.1.2 a)	E	This appears to be an unnecessary duplication of information as long as 6.1.2 b) is complied with.	
6.1.3	G/T	It is not acceptable to present FSC-OPC as an option to gather required information that shall be provided to the customer through supplementary documentation	Rephrase 6.1.3 as follows: If the organization has demonstrated an inability to include the required FSC claim as specified in Clause 6.1.1 g) in sales and delivery documents due to space constraints, the certification body can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company's webpage with verifiable product information). In this case, the organization shall demonstrate that the supplementary method conforms to the following criteria: a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the

			<p>supplementary documentation;</p> <p>b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary documentation;</p> <p>c) In cases where the sales and delivery documents contain multiple products with different FSC claims, each product is cross referenced to the associated FSC claim provided in the supplementary documentation.</p>
6.1.3	G	As the questions and criticisms about the OCP are not cleared yet, the OCP should not find mention in the new standard.	Delete the OCP
6.1.3	T	Here it remains unclear, how often additional information for customers should be provided?	Need of clarification
6.1.3	R	Footnotes should be incorporated in the main body of the standard text. The foot note 3 on EDI (Electronic Data Interchange) billing should be included in the main text body.	Footnote should be incorporated in the main body of the standard text.
6.1.3	T	The reasons for exceptions should be expanded in order to generate more clarity. Furthermore, the intension for usage of a replacement document should be clarified. The reason is to connect delivery documents with respective sales transactions (documents or electronic registration).	If the organization has a justification for it's inability to include the required FSC claim...
6.1.3	G/T	It is not acceptable to present FSC-OPC as an option to gather required information that shall be provided to the customer through supplementary documentation	<p>Rephrase 6.1.3 as follows:</p> <p>If the organization has demonstrated an inability to include the required FSC claim as specified in Clause 6.1.1 g) in sales and delivery documents due to space constraints, the certification body can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company's webpage with verifiable product information). In this case, the organization shall demonstrate that the supplementary method conforms to the following criteria:</p> <p>a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the supplementary documentation;</p> <p>b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary documentation;</p> <p>c) In cases where the sales and delivery documents contain multiple products with different FSC claims,</p>

			each product is cross-referenced to the associated FSC claim provided in the supplementary documentation.
6.1.3	T	Why is the exception for providing FSC Claim information on invoice and shipping documents exclusive to not having enough “space”. There are other, much more costly reasons for not be easily able to comply with this requirements than just space. Allow additional flexibility for justifiable reasons to be confirmed and approved by CBs.	Broaden the exception beyond space.
6.1.3	G	The ability to provide supplementary documentation for sales and delivery documents allows flexibility for recordkeeping for required documentation in complex situations for the transfer of outputs and assist electronic work processes.	Keep as worded.
6.1.3	G	See comment in 6.1.2. Sections 6.1.2 & 6.1.3 should be combined to drop the requirement for duplicity of claim information, so long as the invoice and shipping documentation can be linked and the contingencies in 6.1.3.a and 6.1.3.b are met.	
6.1.3		How often the additional information need to be provided to the client? e.g. each shipment or on a periodical basis in a summary (one time per year)  What reasons could serve as justification?	Complement this clause
6.1.3	T	Why is the exception for providing FSC Claim information on invoice and shipping documents exclusive to not having enough “space”? There are other much more costly reasons for not being able to easily comply with this requirement other than just space. Allow additional flexibility for justifiable reasons to be confirmed and approved by CBs.	Broaden the exception beyond space, allowing CB discretion.
6.1.3	G/T	It is not acceptable to present FSC-OPC as an option to gather required information that shall be provided to the customer through supplementary documentation	Rephrase 6.1.3 as follows: If the organization has demonstrated an inability to include the required FSC claim as specified in Clause 6.1.1 g) in sales and delivery documents due to space constraints, the certification body can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company's webpage with verifiable product information). In this case, the organization shall demonstrate that the supplementary method conforms to the following criteria: a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the supplementary documentation;



			<p>b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary documentation;</p> <p>c) In cases where the sales and delivery documents contain multiple products with different FSC claims, each product is cross-referenced to the associated FSC claim provided in the supplementary documentation.</p>
6.1.3	T	How about 6.1.1 f) (CoC code). It is also something not included on ordinary template.	If the organization has demonstrated an inability to include the required FSC certificate code and/or FSC Controlled Wood code as specified in 6.1.1 f) and/or FSC claim as specified in Clause 6.1.1 g) in sales and delivery documents
6.1.3	T	Space constraint is not only the reason. The reason for this exception to be allowed should be more general.	"due to template or systematic restrictions such as space constraint"
6.1.3	E	supplementary documentation (e.g. supplementary letters, claims made through the OCP)	supplementary method (e.g. supplementary letters, claims made through the OCP)
6.1.3	G	It is not acceptable to present the OCP as an option to gather information that shall be provided to the customer. Its terms and conditions have not even been revised yet and therefore first of all OCP remains a marketing tool that is fraud with many risks for participating companies.	Delete the OCP from all parts of the CoC standard.
6.1.3	E	Use of OCP abbreviation before it has been defined	either change to 'Online Claims Platform' or have this abbreviation added in earlier.
6.1.3	G/T	It is not acceptable to present FSC-OPC as an option to gather required information that shall be provided to the customer through supplementary documentation	<p>Rephrase 6.1.3 as follows:</p> <p>If the organization has demonstrated an inability to include the required FSC claim as specified in Clause 6.1.1 g) in sales and delivery documents due to space constraints, the certification body can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company's webpage with verifiable product information). In this case, the organization shall demonstrate that the supplementary method conforms to the following criteria:</p> <p>a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the supplementary documentation;</p> <p>b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary documentation;</p> <p>c) In cases where the sales and</p>

			<p>delivery documents contain multiple products with different FSC claims, each product is cross-referenced to the associated FSC claim provided in the supplementary documentation.</p>
6.1.3	G/T	<p>It is not acceptable to present FSC-OPC as an option to gather required information that shall be provided to the customer through supplementary documentation</p>	<p>Rephrase 6.1.3 as follows:          If the organization has demonstrated an inability to include the required FSC claim as specified in Clause 6.1.1 g) in sales and delivery documents due to space constraints, the certification body can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company's webpage with verifiable product information). In this case, the organization shall demonstrate that the supplementary method conforms to the following criteria:</p> <ul style="list-style-type: none"> <li>a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the supplementary documentation;</li> <li>b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary documentation;</li> <li>c) In cases where the sales and delivery documents contain multiple products with different FSC claims, each product is cross-referenced to the associated FSC claim provided in the supplementary documentation.</li> </ul>

6.1.3	G/T	It is not acceptable to present FSC-OPC as an option to gather required information that shall be provided to the customer through supplementary documentation	Rephrase 6.1.3 as follows: If the organization has demonstrated an inability to include the required FSC claim as specified in Clause 6.1.1 g) in sales and delivery documents due to space constraints, the certification body can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company's webpage with verifiable product information). In this case, the organization shall demonstrate that the supplementary method conforms to the following criteria: a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the supplementary documentation; b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary documentation; c) In cases where the sales and delivery documents contain multiple products with different FSC claims, each product is cross-referenced to the associated FSC claim provided in the supplementary documentation.
6.1.3	G	We wish to express support to the following proposed revisions to FSC-STD-40-004 V3-0 EN found Part 6, Sales, and Part 9, Credit System – • 6.1.3 - The ability to provide supplementary documentation for sales and delivery documents allows flexibility for recordkeeping for required documentation in complex situations for the transfer of outputs and assist electronic work processes.	
6.1.3 a)	G	During implementation and whenever we add a new supplier it is an ongoing issue to distinguish between goods which is FSC and which is not. I think this is more relevant for us as a finished goods buyer than for a primary manufacturer.	It is recommended to add following after documentation; <b>the organization must clearly state in the sales and delivery documents what is FSC certified and what is not.</b>
6.1.3 a)	E	supplementary documentation	supplementary method
6.1.3 b)	E	supplementary documentation	supplementary method
6.1.3 b)	T	When a CH cannot include FSC claim on invoices and delivery note, it is very likely that they cannot include any other information to make customer understand that full FSC claim is provided through supplementary method. For example, "Full FSC claim is provided by OCP" is much longer than "FSC Mix credit". So an alternative methods (other than through sales and delivery documents) must be allowed to inform customers that Full FSC Claim is provided by a supplementary method. In reality, a CH wishing to purchase FSC certified material do look for Full FSC claim in order to use or resell the material as FSC. Flexibilities should be allowed to meet the intention of this requirement.	b) Customer is communicated somehow and aware that the full FSC claim is provided through supplementary documentation.
6.1.3 c)	E	supplementary documentation	supplementary method

6.1.3.	G	This requirement appears to mainly advice for CB's	Delete and move to 20-001
6.1.4	T	Definition of "unfinished products"?	Definition to be provided in Terms and Definitions Section (E)
6.1.4	G	Should include Unfinished Products in the Glossary as Finished Products are defined there, I believe unfinished products should be defined there too to remove ambiguity.	Add an unfinished product definition to the glossary.
6.1.4	T	Unfinished products should not be mentioned. A company always has his finished products, although this might be a basic material for the next company in the chain.	End products which carry an FSC label shall always be sold with the corresponding FSC claim on their sales and delivery documents.
6.1.4	T	*Allow to label unfinished product, which can be sold to non-certified companies to compose products, for example, packaging.	Why label unfinished products?
6.1.4	T	<p>To fully understand this indicator is essential to define "unfinished product", and give some examples of the possible situation that it can be applied which were not exemplified in the Q&amp;A document. This definition shall consider for which player of the supply chain this product is considered as unfinished. (I.e. for a retailer plywood is a finished product, but for furniture industry plywood is an input - unfinished product).</p> <p>It is not clear for which controversial situation this indicator is trying to avoid, and for which sectors this label in unfinished products would be beneficial for traceability. For instance, for pulp industry this practice will not add advantages once it will still be transformed into paper; however, for plywood retailer which sells FSC products and non-FSC products, this label would help segregation of the materials.</p> <p>Nevertheless, it is not the role of FSC label be a segregation method, but promoting a forest certification to the final consumer. In this context, unfinished products are not directed to the final consumers, but to intermediary players, where a FSC claim in the invoice is enough.</p> <p>Furthermore, there is a risk of this labelling generates more doubts across the supply chain (i.e. market will have: FSC products with label, FSC products without label, and non-FSC products without label).</p>	
6.1.4	T	<p>To fully understand this indicator is essential to define "unfinished product", and give some examples of the possible situation that it can be applied which were not exemplified in the Q&amp;A document. This definition shall consider for which player of the supply chain this product is considered as unfinished. (I.e. for a retailer plywood is a finished product, but for furniture industry plywood is an input - unfinished product).</p> <p>It is not clear for which controversial situation this indicator is trying to avoid, and for which sectors this label in unfinished products would be beneficial for traceability. For instance, for pulp industry this practice will not add advantages once it will still be transformed into paper; however, for plywood retailer which sells FSC products and non-FSC products, this label would help segregation of the materials.</p> <p>Nevertheless, it is not the role of FSC label be a segregation method, but promoting a forest certification to the final consumer. In this context, unfinished products are not directed to the final consumers, but to intermediary players, where a FSC claim in the invoice is enough.</p> <p>Furthermore, there is a risk of this labelling generates more doubts across the supply chain (i.e. market will have: FSC products with label, FSC products without label, and non-FSC products without label).</p>	

6.1.4	T	Request for clarification – is the intent to permit the sale of finished, labelled products (e.g. print materials) without an FSC claim on sales documentation? This would be much appreciated as a simplification of the system.	N/A
6.1.4	T	<p>This requirement has always been an arguable requirement because of unclear wording.</p> <p>There are many cases where CHs purchase labelled products such as printing paper from non-certificate holders. This paper cannot be resold as FSC since it was purchased from non-CHs but it carries FSC label.</p> <p>From the current wording, this “non-certified labelled unfinished product” too has to meet the requirement and I believe that is not the intention of this requirement.</p> <p>There are also many cases when a labelled unfinished product is purchased from a certificate holder but sold to non-certificate holders. In this case, customers sometimes refuse to have any unnecessary information on sales and delivery documents and so the FSC claims are sometimes removed to meet the request of the customers.</p>	<p>6.1.4 The organization applying an FSC label shall ensure that unfinished products which carry the FSC label are always sold with the corresponding FSC claim on their sales and delivery documentation.</p> <p>Or</p> <p>6.1.4 The organization shall ensure that unfinished products which carry an FSC label are always sold with the corresponding FSC claim on their sales and delivery documentation. This requirement is not applicable in case the unfinished labelled products are traded in a broken CoC chain.</p>
6.1.4		Why change to ‘unfinished’? It’s misleading.	Why not use ‘all’ instead or make no changes?
6.1.4	T	Why is this restricted to “unfinished” products? Is it now allowed to sell finished products with FSC label without FSC claims in the sales documents?	Change to “... that products which carry an FSC label WITH THE OWN LICENSE CODE are always ...”
6.1.4	T	A definition of “unfinished products” should be established. IE	Definition: “Unfinished Product”: Without final surface coatings, requires additional machining, fabrication, etc.
6.1.5	G	“The organization shall ensure that products sold with an FSC claim on sales and delivery documentation do not carry any labels from other forestry conformity assessment schemes.” This is not up to date anymore.	Delete.
6.1.5	T	There should be a possibility when this is allowed. Example : A product certified by another forestry scheme can use a promotional logo on a certified packaging material with a FSC logo (on product logo). In this case the packaging material is sold with under an FSC claim. In the principle of this article this will not be possible	
6.1.5	T	Shorten the requirements	Products sold with an FSC claim on sales and delivery documents shall not carry any labels from other forestry conformity assessment schemes
6.1.5	G	“The organization shall ensure that products sold with an FSC claim on sales and delivery documentation do not carry any labels from other forestry conformity assessment schemes.”  This is not up to date anymore.	Delete.
6.1.5	G	This requirement is not acceptable : for example today some product have Ecolabel claim with requirement about forestry conformity and sustainability. Does FSC ask to their customer to give up other Environmental engagement ?	Remove this requirement
6.1.5	T	The difficulty imposed by FSC in not allowing the association of its label with labels of other certification schemes makes companies that have dual certification opt to put the label of other schemes. As a result, it can render the goal of expanding brand recognition, established by FSC in its Strategic Plan.	

6.1.5	T	The difficulty imposed by FSC in not allowing the association of its label with labels of other certification schemes makes companies that have dual certification opt to put the label of other schemes. As a result, it can render the goal of expanding brand recognition, established by FSC in its Strategic Plan.	
6.1.5	G	“The organization shall ensure that products sold with an FSC claim on sales and delivery documentation do not carry any labels from other forestry conformity assessment schemes.”  This is not up to date anymore.	Delete.
6.1.5	G	“The organization shall ensure that products sold with an FSC claim on sales and delivery documentation do not carry any labels from other forestry conformity assessment schemes.”  This is not up to date anymore.	Delete.
6.1.5	G	“The organization shall ensure that products sold with an FSC claim on sales and delivery documentation do not carry any labels from other forestry conformity assessment schemes.”  This is not up to date anymore.	Delete.
6.1.5	G	“The organization shall ensure that products sold with an FSC claim on sales and delivery documentation do not carry any labels from other forestry conformity assessment schemes.”  This is not up to date anymore.	Delete.
6.1.5	G	“The organization shall ensure that products sold with an FSC claim on sales and delivery documentation do not carry any labels from other forestry conformity assessment schemes.”  This is not up to date anymore.	Delete.
6.1.5	G	“The organization shall ensure that products sold with an FSC claim on sales and delivery documentation do not carry any labels from other forestry conformity assessment schemes.”  This is not up to date anymore.	Delete.
6.1.6	E	Clarification and simplification	Change to - - (remove red text) Organizations shall only <b>are only allowed to</b> sell products ...
6.1.6	T	It occurs more often nowadays that products that are not labelled contain two claims: a FSC and a PEFC claim. I think FSC should ask certificate holders to make a choice: a product is or FSC or PEFC. For an FM/COC it is fine, but as soon as it arrives at a mill, it is often entered in a credit system. But COC Companies should choose either FSC or PEFC.	New 6.1.6: Products sold with an FSC claim on sales and delivery documents shall not mention a claim of any other forestry conformity assessment schemes.
6.1.6	E	Clarification and simplification	Organizations shall not make FSC Controlled Wood claims on sales and delivery notes to non FSC certified customers.
6.1.6	T	The standard reference is incorrect within this wording. It should be the 40-005 reference. As this CW standard may change this requirement should not read verbatim wording.	Change wording to remove named standards as they will change.
6.1.6	T	Rainforest Alliance supports the allowance of FSC Controlled Wood claims to non-certified companies. This measure would aid non-certified companies such as retailers implement due diligence system for their responsible sourcing programs.  Worries about such an allowance deterring demand for FSC certified forests can be mitigated by an introduction of an FSC 100% threshold to use the FSC label on finished products.	Remove requirement.

6.1.6	T	The requirement should be removed and CHs should allow selling FSC CW material to non-certificate holders. Because it causes problem for applicant organisations which are under preparation of CoC audit and cannot purchase FSC CW materials with appropriate claim. Safeguard against misunderstanding FSC CW materials as FSC certified should be set up in some other way.	Remove the requirement.
6.1.6	T	I believe the Standard reference should be 40-005, not 40-004. I do not see a need to name the applicable standards (I believe you also forgot to list 30-010), which has nothing to do with what the indicator is trying to ensure. Removing them will make the indicator clearer and more concise.	Change wording to, "Organizations are only allowed to sell products with an FSC Controlled Wood claim on sales and delivery documentation to FSC certified customers."
6.1.6	T	To restrict the sales of FSC CW to certified companies is an unnecessary limitation with no additional value. It causes efforts and unintended non-compliances.	Do not restrict the sales of FSC CW to certified companies, but clarify that the claim FSC CW can only be made business-to-business and not for finished and/or FSC labelled products.
6.1.6	T	There is no clear purpose for this restriction. FSC currently allows FSC certified products to be sold to non- certified customers. Why then would FSC restrict the sale of FSC Controlled Wood to only certified customers? Education by FSC may be required so customers clearly understand different FSC claims. Remove this requirement, as this creates unnecessary burden on manufacturers to establish different part numbers and inventory designations for the same products. It is unreasonable to expect manufacturers to know whether orders are coming from FSC customers or non FSC certified customers.	6.1.6 Should be removed
6.1.6	T	Need to consider this policy overall. Some companies would like to sell FSC CW final product with a claim in order to help their customer meet legality legislation. I.e. if selling furniture into Europe or Australia would greatly help to be able to make a FSC Controlled Wood claim on the invoice. Would agree however that no ON-Product claim could be made.	Consider
6.2.0	G/T	It is not acceptable to have the following paragraph in this or in other FSC standards: Downgrading of FSC claims See comment on 3.2.4 And The information given in the 3 Systems for controlling FSC claims is sufficient	Delete.
6.2.0	E	This requirement is overly detailed and prescriptive	Move entirety of 6.2 to an annex/appendix
6.2.0	G, T	Why is the part 6.2. included in the standard? In addition, the Figure 1. is confusing.	Deletion
6.2.0	G/T	It is not acceptable to have the following paragraph in this or in other FSC standards: Downgrading of FSC claims See comment on 3.2.4 And The information given in the 3 Systems for controlling FSC claims is sufficient	Delete.
6.2.0	G	This new requirement is not clear !!!	
6.2.0	G	Since this Clause is not a certification requirement, the entire clause and Figure should be moved to an information annex	We would propose to delete the entire Clause 6.2 and Figure from the body of the standard.

6.2.0	G/T	It is not acceptable to have the following paragraph in this or in other FSC-standards: Downgrading of FSC claims See comment on 3.2.4 And The information given in the 3 Systems for controlling FSC claims is sufficient	Delete.
6.2.0	G/T	It is not acceptable to have the following paragraph in this or in other FSC-standards: Downgrading of FSC claims See comment on 3.2.4 And The information given in the 3 Systems for controlling FSC claims is sufficient	Delete.
6.2.0	G/T	It is not acceptable to have the following paragraph in this or in other FSC- standards: Downgrading of FSC claims See comment on 3.2.4 And The information given in the 3 Systems for controlling FSC claims is sufficient	Delete.
6.2.0	G/T	It is not acceptable to have the following paragraph in this or in other FSC- standards: Downgrading of FSC claims See comment on 3.2.4 And The information given in the 3 Systems for controlling FSC claims is sufficient	Delete.
6.2.0	G/T	It is not acceptable to have the following paragraph in this or in other FSC- standards: Downgrading of FSC claims See comment on 3.2.4 And The information given in the 3 Systems for controlling FSC claims is sufficient	Delete.
6.2.1	E/T	The Downgrading graphic does not show that FSC Recycled Credit, Percentage and 100 % can be downgraded to FSC MIX	Please add 3 lines to the graphic illustration so it is clear that FSC Recycled Credit, Percentage and 100 % can be downgraded to FSC MIX
6.2.1	G	There is some confusion and concern around whether FSC Recycled claims should be allowed to downgrade to FSC Mix claims. For example, currently products that only contain recycled inputs can still be sold with an FSC Mix claims and label. It is unclear whether this is supported or whether further clarification should be provided in the standard.	With the COC working group discuss and evaluate downgrading from recycled to mix.
6.2.1	T	'(e.g. organizations applying the credit system are not allowed to downgrade credit claims to percentage claims . . .)'	Both triangles in Figure 1 seem to show that the credit claims can be downgraded to percentage claims.
6.2.1	T	Can downgrade claims in any of the three systems – however; can't downgrade credit claims to percentage claim if using credit system. Need to be very clear about this.	Enlarge figure
6.2.1	G, T	Why is the part 6.2. included in the standard? In addition, the Figure 1. is confusing.	Deletion
6.2.1	G, T	Why is the part 6.2. included in the standard? In addition, the Figure 1. is confusing.	Deletion



6.2.1	G, T	Why is the part 6.2. included in the standard? In addition, the Figure 1. is confusing.	Deletion
6.2.1	G, T	Why is the part 6.2. included in the standard? In addition, the Figure 1. is confusing.	Deletion if no added value of this chapter
6.2.1	T	The text says: Organizations shall only use the claims that are allowed in each FSC control system, as specified in Figure 1. But the figure 1 does not mention anything about FSC control system. Figure 1 should be improved to explain what FSC Claims are allowed under each FSC Control system. Currently from the figure 1, it is not possible to understand why organizations applying the credit system are not allowed to downgrade credit claims to percentage claims.	Amend figure 1 to show which FSC Claims are allowed under which FSC control system.
6.3.0	T	Building contractors of use partial invoices during the project. Since they do not know how many products are used in a certain period, but only at the end of the project, this possibility should be specified in the standard. It could be considered whether this should be mentioned as a separate section or maybe a specific standard for building contractors should be the 40-006. It is my experience that projects certificates are not so often used, also because building projects take often longer than a year and therefore it is cheaper to have a regular COC instead of a project certification.	Incase an organisation make use of partial invoices the organisation shall: a. Mention on partial invoices: "this project contains FSC certified products (XXX-COC-123456). With the last invoice you will receive an overview of all FSC certified products; b. Mention on the invoice on which the products will be invoiced: This project contains FSC certified products (XXX-COC-123456). Attached you find an overview of all FSC certified products in this project. c. Mention on the attachment: i. name and contact details of the organization; ii. Name or number of the project; iii. date when the document was issued; iv. certificate code v. invoice numbers of which invoices the overview is an attachement to. vi. description of the product(s); vii.. clear FSC claim...per product.; vi. quantity NOTE: the quantity may be expressed in pieces or weight or volume (m <sup>3</sup> ) or, if the organisation is the last organisation in the chain, in m <sup>2</sup> of m1 if the product description mention the other information to calculate the m <sup>3</sup> in case necessary.
6.3.1	T	The change of the NOTE below 6.1.1 g) is very helpful!	Yes, change to note as formulated in the draft.
6.4.0	T	The problem is that companies often ask for new invoices in order to solve a NC written out by an Auditor. The result is that new invoices often are copies of the original one but then with correct FSC claim. My suggestion is to add the requirement in the next column. My main goal is to solve the problems with incorrect invoices without having extra work for the certificate holders that are doing a good job. Only the 'bad ones' should feel that they can better just use the system as they are supposed to. If this requirements is added, in combination with the CB database and sharing the allowance to share relevant documents between CB's, non-conforming products and incorrect invoices can be identified and used by auditors.	In case the organisation receives a request to issue a new invoice containing FSC certified products, the organisation shall: a. Give the new invoice, a new invoice number; b. Keep copies of both the original invoice, the credit invoice and the new invoice; c. Shall inform the CB about the request and the original, credit and new invoice

7.0 transfer system	G	There should be added an example of the situation of paper and print industry in the diagram.	
7.0 transfer system	E	7 Diagram (and all subsequent diagrams) Illustration is informative and not a normative requirement.	Move diagram to an appendix/annex
7.0 transfer system		Considering table D for Transfer system there is an error in the classification of table E for Pre-cons. reclaimed paper and Post-cons. reclaimed wood and paper which consider as an output FSC Recycled or Mix 100%.	For Pre-cons. reclaimed paper and Post-cons. reclaimed wood and paper New wording: FSC Recycled <b>or Mix 100% (remove red text)</b>
7.0 transfer system	E	The presentation of example scenarios of application of the transfer system is useful, but does not seem to fit into the normal practice of standards writing. These illustrative examples should be placed in an informative annex.	Move example scenarios illustrations into an annex.
7.1.1		include this item in next point 7.1.2	
7.1.1	T	This could be interpreted that the transfer system can only be applied at the level of a single site.	Consider reference to how the transfer system can be applied to a multisite or group situation (ref. multisite STD).
7.1.2	G	There are some concerns that the revision to the definition of finished product is not clear enough for determining whether an organization is restricted just to the transfer system. It is still unclear whether products like lumber or plywood are considered finished or unfinished, because it's based on the "intended use", which is up to the customer and not the supplier. So in some cases it may be finished and in some cases it might not be, and it would be impossible for a certificate holder to know what the intentions are of their customers who purchase the products.	Review with working group to determine if there are options for a more clear definition and application here in the transfer system without going to much greater detail or complexity.
7.1.2		The company that I work for is certified under the transfer system and invoices and sells everything at the lowest common denominator, FSC Mix 70%. Will this affect us?	
7.1.2	T	It is unclear which companies this is applicable to.	See comments for definition of finished product
7.1.2	E	Given the wording of 7.1.2.d, 7.1.2.e is redundant as food medicinal NTFPs is already included in "NTFPs except bamboo and NTFPs derived from trees".	Delete 7.1.2.e
7.1.2	T	This clause adds confusion to what the transfer system can be used for as the Standard does not separately state (as a clause and not in the graphic on the previous page) that the transfer system can also be used with other inputs e.g. Mix	Add appropriate clarification
7.1.2	T	7.1.2.C is penalizing Traders without physical possession. It will increase seaport problems, breaking all the flexibility that the credit system has along the Chain of Custody.	Remove item C
7.1.2	G	Previous version had transfer system must be used for trading activities – in this version – transfer system must be used for trading, distribution, and retail. We currently have a distribution center that utilizes a mix % program to get certified DF to a specific customer. This requirement appears to no longer allow this. Does adding an FSC label to a products count as "finishing a product"?	This is a big deal! Change back to original requirements. Not sure how many distribution entities have this issue but I would think at least a few. Needs to revert back to original language or make it very clear that applying a new FSC label is considered finishing a product.
7.1.2	T	Very good that it is defined who HAS TO use the Transfer System. In addition: The Transfer System SHOULD BE USED IF POSSIBLE, to avoid unintended mistakes and to raise the demand for certified material. Misuse by using the percentage or credit system could be reduced.	Add to 7.1 that the Transfer System SHOULD be used if applicable with regard to the company's processes and availability of certified materials.
7.1.2	T	According to current formulation only trading and processing of FSC 100 % is possible. What about processing of raw material with other claims? 7.4.1 says about mixing different claims, how this can be done if 7.1.2 allows processing only of FSC 100 %?	We would suggest to add possibility of using other FSC claims into the requirement.

7.1.2	T	7.1.2 alone is missing information stated in 7.4.1.	7.1.2 may need to make a reference to 7.4.1 or integrate 7.4.1 information in order to facilitate the understanding.
7.1.2	T	What about where buying FSC mix or FSC percentage product, & doing processing? Why can't transfer system be used? Eg. buying FSC mix paper, making publication, as 7.3.1 makes clear Also the transfer system is surely not the "only" system available to those handling FSC 100% material, they are still able to use the credit system if they wish	Re phrase
7.1.2	T	I strongly support the limitation of non-fabrication facilities to the transfer system. This was the main purpose of Motion 70 at the 2014 GA: Increase FSC credibility by prohibiting distributors of wood products (including lumber, panel products, flooring, decking, siding, etc. but NOT including logs, pulp, paper, sawmill residuals, etc.) from using the credit system, and requiring them to instead use the transfer system.  "Distributor" in this context is intended to cover companies who only act as traders or distributors as opposed to examples where companies fabricating AND distribute product.	Change 7.1.2 b) to read "trading, distribution and retail of finished products and paper (e.g. paper merchants and lumber wholesalers, brokers, and distributors). Change 7.1.2 c) to read "trading of products without physical possession by certified company or outsource facility."
7.1.2	T	Under the current 7.1.2 section that is used to indicate who is required to be on a transfer system broker wording is not in place. A broker of pulp can be on a credit system as they trade in an unfinished product with the new wording. A credit system could be applied to material that is never in physical possession such as lumber or pulp. If this is the intent of the standards it should be publically stated.	Add word Broker as a separate line on 7.1.2 NEW item F A list of types of manufacturers should be highlighted as types that are allowed to be on a credit system to further clarify this issue.
7.1.2 a)	T	Revise this section to clarify that processing of products carrying FSC 100% label is acceptable under the Percentage and Volume credit systems.	a) Trading of products carrying FSC 100% label and/or output claim;
7.1.2 b)	T	It is not clear why the "paper" is specially separated from "products". I do not see any need for separating paper from products as paper is a form of product that is no special than others.	b) Trading, distribution, and retail of finished products
7.1.2 d & e	E	It is not necessary to include clause e) as it is covered under d)	Delete 7.1.2.e
7.1.2 d)		Add in the letter d) seeds as an example.	
7.1.2 d)	T	I do not see the reason for excluding bamboo and NTFPs derived from trees.	Please provide the reason in the standard as note or something.
7.1.2 e)	G	Why is the transfer method the only applicable to trading and processing of food and medicinal NTFPs?	
7.1.2 e)	T	This is not needed as it is included in (covered by) 7.1.2. d).	Remove 7.1.2 e). Or Combine d) and e) as follows: d) Trading and processing of food and medicinal non-timber forest products (NTFPs), except bamboo and NTFPs derived from trees (e.g. cork, resin, bark);
7.1.2.c	T	Removal of the ability to use in the credit system would result in lower availability of product in the market place. It would also increase costs on the on the product and raise the 'CARBON FOOT PRINT' and reduce the 'ENVIRONMENTAL CREDENTIALS' of the system.	Remain within the Credit System to allow flexibility within the market whilst still complying with FSC Transfer System.
7.1.2.e	G	Why is the transfer method the only applicable to trading and processing of food and medicinal NTFPs?	
7.2.1	T	The situation of traders is not reflected adequately. The Transfer System should simply be usable for product trading on the basis of articles (not claim periods, not job orders).	Add "article" with the limitation for trading without changing the products physically.

7.2.1, 7.2.2	G	It is difficult to understand why claim period in Transfer system is needed at all. What added value to control claims, volumes, etc. does this give? E.g. company is trader and buys many different products from different suppliers as well as sells to many different customers (shops, factories, etc.). With some of them it has orders, with other agrees on phone, from some it buys as certified but sell as not certified, to some sells always certified and etc. So in general there is no universe order system, as well as the same product is not always sold as FSC certified (even if it was bought as such). How claim period can be indicated in such case?	We would suggest to withdraw requirements related to claim period in Transfer system and require clear accounting showing that what was bought with FSC claim is sold with the same or lower FSC claim.
7.2.2	T	Why must a CH: "...specify the length of the claim period"?	Please explain the reason for this change in second draft that goes in public consultation
7.2.2	T	Is there a maximum claim period – if so would clarification here be helpful?	Consider
7.3.1	G	Inputs with Identical FSC Claims: AF&PA supports the recommendation that "pre-consumer" reclaimed paper count as input material for FSC Recycled and FSC Mix claims. "Pre-consumer" fibre should be valued equally as "post-consumer" fibre since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance.	
7.3.1	T	Pre-consumer: Pre-consumer fiber should count as an eligible input and count as certified fiber.	
7.3.1	E	Table D is informative and not a normative requirement.	Move table to an appendix/annex
7.3.1	E	In table D pre-consumer reclaimed paper or fibre is defined as input materials with FSC Recycled 100% as output claim in the transfer system. Depending on the definition of fibre. If this also includes MDF/ or particle board and other "wood" products made of fibre, this is not in line with the definition of claim-contributing input and with motion 38 (2011).	Delete: or Pre-consumer reclaimed paper <b>or</b> fibre
7.3.1		7.3.1 is contradicting to 6.2.1. A trader should still have the option to sell products with a lower claim than received (=downgrade) and not be forced to define a job order related claim separately for each specific job order.	
7.3.1	G	Erfurt & Sohn KG / german paper solutions GmbH & Co.KG appreciate that pre-consumer reclaimed paper counts a claim-contributing input.	
7.3.1		I support the recommendation that "pre-consumer" reclaimed paper count as input material for FSC Recycled and FSC Mix claims. "Pre-consumer" fibre should be valued equally as "post-consumer" fibre since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance.	
7.3.1	E	This sentence is very unclear – I'm not even sure what it means	Revise this sentence for clarity. I think you could just say for claim periods in which the same input with identical FSC claims were used – used the same claim for the outputs? No need to make the language so complex.
7.3.1	T	FSC Recycled 0 % claim or FSC CW claim should be allowed for pre-consumer reclaimed wood at transfer system. When pre-consumer reclaimed wood is evaluated by a CH in accordance with FSC-STD-40-007, if the CH is certified under transfer system, the purchaser of the reclaimed wood will be required to conduct verification based on 40-007 again. This will be redundant and a certain FSC claim is to be introduced for verified pre-consumer reclaimed wood.	FSC Recycled 0 % claim or FSC CW claim should be allowed for pre-consumer reclaimed wood at transfer system.

7.3.1	G	Inputs with Identical FSC Claims: GPI supports the recommendation that “pre-consumer” reclaimed paper count as input material for FSC Recycled and FSC Mix claims. “Pre-consumer” fibre should be valued equally as “post-consumer” fibre since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance.	
7.3.1 Table D	T	Why pre-consumer reclaimed wood is not applicable to the transfer system while pre-consumer reclaimed paper or fibre is FSC recycled 100%?	
7.3.1 Table D	T	Why pre-consumer reclaimed wood is not applicable to the transfer system while pre-consumer reclaimed paper or fibre is FSC recycled 100%?	
7.3.1 Table D	E	Table is for information and does not need to be in the main part of the Standard	Move table to an appendix/annex
7.3.1 Table D	G	Following the comment above about pre-consumer reclaimed wood, FSC should include the materials that follow the same principle, instead of creating exceptions which will be difficult to understand and justify. In case a separate study is necessary to implement this, Sonae Indústria if fully available to cooperate in such work.	Remove the line about ‘Pre-consumer reclaimed wood’, and change the previous line text into: “Pre-consumer reclaimed materials”.
7.3.1 Table D	T	Combined Pre and Post Consumer is not listed as an option in this table. I believe this was an oversight.	Include a combined Pre and Post Consumer line along with the FSC Recycled 100% claim.
7.3.1 Table D	T	The diagram has to be more comprehensive. Is recycled considered higher grade than mix (from the table E, it looks like so)?	
7.3.1. Table D	E?	See also my first comment: do not understand why “pre-consumer reclaimed wood” cannot lead to an “FSC Controlled Wood” output claim.  First Comment: “Claim-contributing Input” definition is confusing: It does not describe the “claims”: d) pre-consumer reclaimed wood e) FSC Controlled Wood and in other places I see these two categories as referred to as non-claim (see below). I do not understand: I understand that in B2B claims one can sell “FSC CW” for example, and both d) and e) are legitimate additions to FSC certified materials, so why are they not “claim-contributing”. I think this is going to create misunderstandings.	
7.4. Table E	E?	See again my first comment and the one directly above here; why no claims for “pre-consumer reclaimed wood”?  First Comment: “Claim-contributing Input” definition is confusing: It does not describe the “claims”: d) pre-consumer reclaimed wood e) FSC Controlled Wood and in other places I see these two categories as referred to as non-claim (see below). I do not understand: I understand that in B2B claims one can sell “FSC CW” for example, and both d) and e) are legitimate additions to FSC certified materials, so why are they not “claim-contributing”. I think this is going to create misunderstandings.	
7.4.1	G	Inputs with Different FSC Claims: AF&PA supports the inclusion of “pre-consumer” reclaimed paper as input material for FSC Recycled and FSC Mix claims. “Pre-consumer” fibre should be valued equally as “post-consumer” fibre since they provide equivalent environmental benefits and economic value to papermakers who use	

		them as best meets customer needs in terms of product quality, cost, functionality and performance.	
7.4.1	T	Inputs with different FSC Claims: Both post-consumer and pre-consumer inputs should be counted as equal and eligible inputs into a FSC CoC system.	Simplify this section with respect to post and pre-consumer inputs.
7.4.1	E	Table E is informative and not a normative requirement	Move table to an appendix/annex
7.4.1	E	This clause refers to volume, but in the transfer system there is no need to look at volume or quantities. This may lead to confusion how to apply the transfer system.	Delete: per input volume For claim periods or job orders in which inputs of different material categories or associated percentage claims or credit claims are mixed, the organization shall use the lowest FSC claim <b>per input volume</b> as the FSC claim for the outputs, as indicated in Table E.
7.4.1	T	In table E for the combinations with recycled and reclaimed materials the option is given to apply a FSC claim in the Mix category. This is confusing and leads to loss of information of the products characteristics and therefore to the credibility of the FSC system. See for an example of the changes (in red) the table (E) at the bottom of this document. Furthermore an extra clarification that certification against FSC-40-007 is needed to use the reclaimed inputs	See for an example of the changes (in red) the table (E) at the bottom of this document (see Sheet: De & D Table).
7.4.1	E	7.4.1 Table E Column FSC Mix % and line FSC Credit Mix is wrong	The combination should be FSC Mix %
7.4.1	T	7.4.1 Table E Allow the FSC Mix 100% claim for products with only reclaimed materials allows a confused message to the consumer, failing to report and provide transparency to consumers about products with forest inputs and products that have just reclaimed inputs. Still, does not value products that have forest management inputs, as compete with FSC Mixed x% and FSC Mixed Credit	Remove the claim FSC 100% to products made exclusively with reclaimed inputs. Products like this must be FSC Recycled.
7.4.1		I support the inclusion of "pre-consumer" reclaimed paper as input material for FSC Recycled and FSC Mix claims. "Pre-consumer" fibre should be valued equally as "post-consumer" fibre since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance.	
7.4.1	T	Keep it simple by using only one claim you do not need a complex matrix structure. What is the added value ?	Do not use
7.4.1	G	The table shows how complicated the system is with the existing claim structure. This should generally be put into question.	Re-think the system of FSC Claims. Wouldn't a simple % claim not be sufficient to meet the goal of COC certification? What is the aim of the Credit claim if a note is necessary that it is countable as 100%? What is the value of three different FSC labels if one can be happy if the consumer at least realises the checkmark-tree-logo?

7.4.1	G	Inputs with Different FSC Claims: GPI supports the inclusion of “pre-consumer” reclaimed paper as input material for FSC Recycled and FSC Mix claims. “Pre-consumer” fibre should be valued equally as “post-consumer” fibre since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance. In addition, “post-consumer” content is reclassified as “pre-consumer” when trimmings are created in the printing process. This is an example of how difficult it is to maintain the distinction between the two materials in practice.	
7.4.1 Note	E	Examples are useful to understand the spirit of the standard requirements, but should not be mixed within the standard requirements text. These illustrative examples should be placed in an informative annex.	Move examples description into an annex
7.4.1 Table E	E	Table is for information and does not need to be in the main part of the Standard	Move table to an appendix/annex
7.4.1 table E	T	It is not clear if ‘inputs’ in the upper left corner of the matrix refer to rows or to columns. Outputs likewise could be either rows or columns. It is not clear how table E on page 23 fits with table C on page 20.	clarify
7.4.1 Table E	G	Exceedingly confusing table. I’m not sure what is what. I also notice there is an output claim of FSC mix 100%. Really? That is the most confusing claim I have ever heard of!	Re-work this table for clarity. Why doesn’t FSC mix credit X FSC 100% have an associated claim for instance? Also, the claim FSC Mix 100% should never be used. Very confusing and a bad idea. This is the worst idea for a claim I have ever seen!
7.4.1 Table E	T	Allowing the FSC Mix 100% claim for products with only reclaimed material inputs creates a confusing message to the consumer, failing to report and provide transparency to consumers about the product’s composition. This allowance is in direct contradiction of figure 1 on page 26 as well as FSC’s intent to clarify the meaning of the FSC Mix label.	Products composed of FSC Recycled or reclaimed inputs only shall be restricted to using the FSC Recycled label. Table E should be edited to demonstrate this restriction.
7.4.1 Table E	G	An excellent addition!	None.
7.4.1 Table E	T	Inconsistency with the <a href="http://ic.fsc.org/download.standards-interpretation-transfer-claim-table.992.htm">http://ic.fsc.org/download.standards-interpretation-transfer-claim-table.992.htm</a>  If mixing of FSC recycled and FSC recycled can be outputted as FSC mix, it indicates FSC mix is equal or lower grade than FSC recycled. <a href="http://ic.fsc.org/download.downgrade-fsc-output-claims-diagram.1048.htm">http://ic.fsc.org/download.downgrade-fsc-output-claims-diagram.1048.htm</a> this diagram says, downgrading of FSC recycled credit is not allowed. But table E shows mixing FSC recycled credit with FSC recycled credit can make FSC mixed credit.	<a href="http://ic.fsc.org/download.standards-interpretation-transfer-claim-table.992.htm">http://ic.fsc.org/download.standards-interpretation-transfer-claim-table.992.htm</a> and <a href="http://ic.fsc.org/download.downgrade-fsc-output-claims-diagram.1048.htm">http://ic.fsc.org/download.downgrade-fsc-output-claims-diagram.1048.htm</a> and table D and E all have to be consistent.
7.4.1, Table E		Considering table D for Transfer system there is an error in the classification of table E for Pre-cons. reclaimed paper and Post-cons. reclaimed wood and paper which consider as an output FSC Recycled or Mix 100%.	For Pre-cons. reclaimed paper and Post-cons. reclaimed wood and paper New wording: FSC Recycled or Mix 100% (remove red text)
7.4.1. Table E	G	Following the comment above about pre-consumer reclaimed wood, FSC should include the materials that follow the same principle, instead of creating exceptions which will be difficult to understand and justify. In case a separate study is necessary to implement this, Sonae Indústria if fully available to cooperate in such work.	Remove the line and column about ‘Pre-consumer reclaimed wood’, and change the next line and column text into: “Pre-consumer reclaimed materials”.

8.0 & 9.0 Table F, G		The intention of incorporating pre and post-consumer reclaimed material as eligible inputs for FSC claim is good for production purposes, but they must be ensured that they are always associated with the FSC Recycled. It is unfair to give market value to a product of an organization that has invested in forest management certification, including fulfilling social requirements, with the product from an organization that bought only recycled materials, which means that this organization has not undergone an evaluation of FM.	Ensure that pre and post-consumer reclaimed materials are always associated with the FSC Recycled claim.
8.0 percentage system	G	There should be added an example of the situation of paper and print industry in the diagram.	
8.0 percentage system	E	Illustration is informative and not a normative requirement.	Move diagram to an appendix/annex
8.0 Percentage System	G	Drop down the Percentage system. It would simplify the whole system.	The term FSC claim can be deleted, because with this idea it is equivalent to the FSC material category – no more confusion for people in practise: only FSC Mix, FSC Recycled, no x%, no Credit.
8.0 percentage system	E	The presentation of example scenarios of application of the percentage system is useful, but does not seem to fit into the normal practice of standards writing. These illustrative examples should be placed in an informative annex.	Move example scenarios illustrations into an annex.
8.0 percentage system	T	Scenario A The picture showing a pile of 6 logs of FSC 100% with a picture of 6 logs of FSC MIX 70% does not tally with the example given (4 units of FSC 100% and 8 units of MIX 70%). This is confusing to those seeking clarification through the diagram.	Update the pictures in the diagrams to visually show the correct number of units in the example given
8.0 percentage system	T	Scenario B The picture showing a pile of 6 logs of FSC 100% with a picture of 6 logs of FSC MIX 70% does not tally with the example given (4 units of FSC 100% and 8 units of MIX 70%). This is confusing to those seeking clarification through the diagram.	Update the pictures in the diagrams to visually show the correct number of units in the example given
8.0 percentage system	E	The drawing appear before the explanation. It might be easier to read if the explanation is either with the drawings or before	Equation either with or before drawings
8.0 Percentage System	T	The Credit and Percentage Systems should be treated equally. Whatever we decide is acceptable for credit sharing between sites that are on the credit system shall be applied and allowed for the percentage system. Limits to who can use the credit system vs transfer system shall also be applied to the percentage system. These discussions were brought up by facilities on the credit system but the factors are the same for percentage system. Keep the systems fair and even and avoid having to go through the same exhaustive process again for percentage system.	The outcomes from cross-site sharing and limitations on who can use the credit system shall be automatically applied to the Percentage System.
8.0 percentage System 9.0 credit system		The intention of incorporating pre and post-consumer reclaimed material as eligible inputs for FSC claim is good for production purposes, but they must be ensured that they are always associated with the FSC Recycled. It is unfair to give market value to a product of an organization that has invested in forest management certification, including fulfilling social requirements, with the product from an organization that bought only recycled materials, which means that this organization has not undergone an evaluation of FM.	Ensure that pre and post-consumer reclaimed materials are always associated with the FSC Recycled claim.
8.1.2	G	We believe the credit trading should include the percentage system. This will allow for expanded demand for FSC material and management in the channel.	



8.1.2	T	The scheme should allow for cross site percentage systems with the same safeguards as 9.1.3. this would allow products sourced in same country to be sold with claim despite local variation to available certified product without moving raw material vast distances between sites to maintain percentage inputs at specific sites.	8.1.2 The percentage system may be applied at the level of single and multiple sites (shared percentage account) 8.1.3 new clause Shared percentage accounts may only be applied if the following conditions are met: a) All sites are within the scope of a multi-site certificate with a common ownership structure. b) All sites are located in the same ecoregion (e.g Canadian boreal , Amazon river) and country. c) Each site participating in a share percentage account shall contribute at least 10% of the input percentage used by its own site in a twelve month period.
8.1.2	E	Table F is informative and not a normative requirement	Move table to an appendix/annex
8.1.2		FSC should allow credit trading in the percentage system as well. It poses no additional issues to credibility and will provide needed system flexibility.	
8.1.2	G	We support the introduction of a shared percentage model analogous to the shared credit accounts.	PSU should consider a pilot on shared percentage accounts & see comments on shared credit accounts (Section 9).
8.1.2	G	There does appear to be a lot of interest and support in the introduction of the shared credit account model to the percentage system for multi-site certificate holders. Preconditions for use will need to be included, similar if not identical to the preconditions used for the credit system. However, the preconditions need to be revised (see analysis in section 9.1.3).	Review and evaluate the introduction of shared percentage systems for CHs on the percentage system.
8.1.2	T	Extend the opportunity for cross-site “credit” sharing to percentage based schemes as well.	Extend the opportunity for cross-site “credit” sharing to percentage based schemes as well.-
8.1.2	T	We would propose the introduction of the cross-site model to the percentage system to allow flexibility for organizations with multi-site chain of custody certificates with a common ownership structure for product labelling. Requiring each site to meet the FSC claim percentage has implications related to the overall carbon footprint of the organization and inefficiencies in supply chain management.  We propose a new Clause 8.1.3 and need to define how it would apply to multi-sites that are closely related as to manufacturing locations and similarity of eligible inputs. As an example, we have multiple non-integrated tissue manufacturing operations making similar product codes using similar eligible inputs as raw materials. Thus, the requirement under the credit system that all sites are located in the same ecoregion and country would not work in this example.  We would support the requirement that each site within a multi-site certificate meet some minimum percentage input.	We would propose Clause 8.1.2 to read “the percentage system may be applied at the level of a single and multiple sites (“shared percentage measurement system to meet the FSC claim percentage”).  A new Clause 8.1.3 “Shared percentage calculations may only be applied if the following conditions are met: a) All sites are within the scope of a multi-site certificate with a common ownership structure.
8.1.2 & 9.1.1	G	Can the activities just be listed again to avoid referring backwards and forwards within the document	List activities against each clause
8.1.2 Table F	E	Table is for information and does not need to be in the main part of the standard	Move table to an appendix/annex

8.2.1	G	Accounting of Claim-contributing Inputs: AF&PA supports the recommendation that “pre-consumer” reclaimed paper counts as the full quantity as stated on the supplier invoice. “Pre-consumer” fibre should be valued equally as “post-consumer” fibre since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance. Mandates or labelling schemes that preference “post-consumer” content in products often result in distortions in the market-driven demand/supply balance by driving up prices for some usable fibre while placing an artificial barrier to the use of other equally environmentally beneficial reclaimed paper. Benefits accrue from utilizing all available sources of reclaimed paper, not by singling out a specific source as the one that “counts.”	
8.2.1	G	Why the distinction between pre-consumer paper and pre-consumer wood as “claim- contributing Inputs”? Why is it necessary to continuously build in complexity and anomalies to the FSC system?	Either allow both pre-consumer wood and pre-consumer paper to both contribute to claims, or neither.
8.2.1	T	Pre and post consumer paper both counting as claim contributing inputs.	Will this require a revision to FSC-STD-40-07 Clause 3 : “Material inspection and classification upon receipt 3.1 Upon receipt, all reclaimed materials shall be verified through visual inspection and classified into pre-consumer and /or post consumer reclaimed material. 3.2 The organization shall retain objective evidence for each supply confirming that the reclaimed materials comply with FSC definitions for pre-consumer and post-consumer”
8.2.1	T	Accounting of Claim-contributing inputs: Pre-consumer inputs should count equally as post-consumer inputs as eligible certified inputs.	
8.2.1	E	Clause 8.2.1 Clause 9.4.1 Table F + G In the table is referred to an invoice, where this can also be another sales “document” (e.g. electronical record). Line 3 of the table states that it “counts to the percentage”, this should be the percentage of the full quantity.	Change: invoice in sales document  Add: of the full quantity  Counts as the percentage of the full quantity as stated on the supplier invoice sales document.
8.2.1		8.2.1 Here it seems that Controlled wood and neutral material is the same. This would make a lot of problems because a lot of products have neutral material. This is a discrepancy to page 9, where you can find the definition of neutral material	
8.2.1	G	Erfurt & Sohn KG / german paper solutions GmbH & Co.KG appreciate that pre-consumer reclaimed paper counts a claim-contributing input.	
8.2.1		I support the recommendation that “pre-consumer” reclaimed paper counts as the full quantity as stated on the supplier invoice. “Pre-consumer” fibre should be valued equally as “post-consumer” fibre since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance. Mandates or labelling schemes that preference “post-consumer” content in products often result in distortions in the market-driven demand/supply balance by driving up prices for some usable fibre while placing an artificial barrier to the use of other equally environmentally beneficial reclaimed paper. Benefits accrue from	

		utilizing all available sources of reclaimed paper, not by singling out a specific source as the one that “counts.”	
8.2.1	G	Accounting of Claim-contributing Inputs: RockTenn supports the recommendation that “pre-consumer” reclaimed paper counts as the full quantity as stated on the supplier invoice. “Pre-consumer” fibre should be valued equally as “post-consumer” fibre since they provide equivalent environmental benefits and economic value.	
8.2.1	G	Accounting of Claim-contributing Inputs: GPI supports the recommendation that “pre-consumer” reclaimed paper counts as the full quantity as stated on the supplier invoice. “Pre-consumer” fibre should be valued equally as “post-consumer” fibre since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance. Mandates or labelling schemes that preference “post-consumer” content in products often result in distortions in the market-driven demand/supply balance by driving up prices for some usable fibre while placing an artificial barrier to the use of other equally environmentally beneficial reclaimed paper. Benefits accrue from utilizing all available sources of reclaimed paper, not by singling out a specific source as the one that “counts.” In addition, “post-consumer” content is reclassified as “pre-consumer” when trimmings are created in the printing process. This is an example of how difficult it is to maintain the distinction between the two materials in practice.	
8.2.1	G	See on top, comment to terms and conditions concerning pre-consumer reclaimed wood. The usage of reclaimed paper is not more or less ecological as the usage of pre-consumer reclaimed wood (for example chip board residues from the furniture industry that are used in for the production of new chipboards)	Please change the standard in the sense, that each usage of reclaimed material is equal than certified input.
8.2.1 table F	T	Controlled wood shall count as the full quantity as stated on the supplier invoice	Correct table.
8.2.1 Table F		Why pre-consumer reclaimed paper and fibre counts as the full quantity as stated on the supplier invoice while pre-consumer reclaimed wood (cork?) do not count as claim-contributing input?	
8.2.1 Table F		Why pre-consumer reclaimed paper and fibre counts as the full quantity as stated on the supplier invoice while pre-consumer reclaimed wood (cork?) do not count as claim-contributing input?	
8.2.1 table F	T	Controlled wood shall count as the full quantity as stated on the supplier invoice	Correct table.
8.2.1 table F	T	Controlled wood shall count as the full quantity as stated on the supplier invoice	Correct table.
8.2.1 Table F	G	Following the comment above about pre-consumer reclaimed wood, FSC should include the materials that follow the same principle, instead of creating exceptions which will be difficult to understand and justify. In case a separate study is necessary to implement this, Sonae Indústria if fully available to cooperate in such work.	Remove the line about ‘Pre-consumer reclaimed wood’, and change the previous line text into: “Pre-consumer reclaimed materials”.
8.2.1 table F	T	Controlled wood shall count as the full quantity as stated on the supplier invoice	Correct table.

8.2.1 table F	T	Controlled wood shall count as the full quantity as stated on the supplier invoice	Correct table.
8.2.1 table F	T	Controlled wood shall count as the full quantity as stated on the supplier invoice	Correct table.
8.2.1 table F	T	Controlled wood shall count as the full quantity as stated on the supplier invoice	Correct table.
8.2.1, 9.4.1	T	<p>We have following concerns for including preconsumer reclaimed paper as claim-contributing input:</p> <p>1) Concerns that it will discourage increase of FSC certified forests</p> <ul style="list-style-type: none"> <li>• Compared with materials derived from FSC FM certified forests, pre-consumer reclaimed materials are more easily available. As a result, in a country like Japan where paper containing recycled materials prevailing in the paper market, it is likely that almost all the paper products will become eligible for FSC MIX or recycle labelling after the standard revision.</li> <li>• In such a situation, procurement of FSC claim contributing materials will focus on reclaimed materials. This will reduce the motivation for acquiring FSC FM certification. In the end, it does not lead to the FSC's objective to promote responsibly managed forests.</li> </ul> <p>2) Concerns for confusion in the market</p> <ul style="list-style-type: none"> <li>• Under the current FSC definition, products that have high percentage of reclaimed materials and those made from 100% virgin pulp are both labelled FSC MIX.</li> <li>• Under such condition, when it becomes easier to get more credit from reclaimed materials, more FSC products made from reclaimed materials will be available in the market. This may lead to misunderstanding that FSC is a label for products from reclaimed materials. This will hinder correct understanding about FSC scheme, and discredit the certification system as a whole.</li> </ul>	<ul style="list-style-type: none"> <li>• To resolve this paradox, it will be effective to distinguish products from wood material and products from reclaimed paper.</li> <li>• We propose establishing a new claim category such as "FSC wood" as below: (see sheet 'Oji Table')</li> </ul>
8.2.1.	E?	<p>See again my first comment</p> <p>First Comment:  "Claim-contributing Input" definition is confusing:  It does not describe the "claims":  d) pre-consumer reclaimed wood  e) FSC Controlled Wood  and in other places I see these two categories as referred to as non-claim (see below). I do not understand: I understand that in B2B claims one can sell "FSC CW" for example, and both d) and e) are legitimate additions to FSC certified materials, so why are they not "claim-contributing".  I think this is going to create misunderstandings.</p>	
8.4.1	T	<p>*conversion factor is not included</p> <p>8.4.1 insert conversion factor of each input in the official account to avoid distortions when there is use of FSC and CW with different Conversion factors.</p>	8.4.1 include conversion factor of each input in the official account to avoid distortions
8.4.1	T	Percentage calculations need to use identical units of measurement to be accurate.	Add a note that requires identical measurements of unit within the percentage calculation.
8.4.1, 8.4.2, 8.4.3, 8.5.1 and Terms and definitions	E	The term "FSC percentage" and "input percentage" need to be sorted out. Consistent term should be used.	<p>As long as consistent term is used, either is OK. But two different terms should not be used to mean exactly the same thing.</p> <p>It looks like replacing "input percentage" with "FSC percentage" might work.</p>

8.4.2	T	In most cases when percentage system is used, a company is making a standardized articles with fixed specification. So once the specification is fixed, the percentage does not change until the specification is changed. So concept of calculating the percentage only once for a standardized articles with fixed specification should be included here too. As long as the specification stays the same, the company does not need to record unnecessary calculations.	I cannot suggest a good way to include the concept. Could be done by amending a). Could also be done by adding a new texts as c).
8.4.2 NOTE	T	This note indicates that if you are using a rolling average on a percentage system (12 months) you can only start once you have 12 months of accumulated data? This seems incorrect. Seems to discourage the use of rolling averages.	Suggest rolling averages start with available data of at least 1 month. Go from there. Why hold back good COC implementers from implementing before 12 (or however many months) of data are accumulated?
8.5.2	G	I do not understand this requirement in the practical context! 1) Who will sell products as FSC Controlled Wood when applying the percentage system, since the entire production per claim period can be sold as FSC Mix / Recycled X% certified? Why downgrading a material when there is no benefit (as it is for example when using the credit system)? 2) Why would the sale of FSC Controlled Wood in this case require the certification against FSC-STD-40-005, whereas the general sale of FSC Controlled Wood seems to be covered by the FSC-STD-40-004 Vers.3.0? Would it not be more important to see if only certified materials and already FSC Controlled Wood verified materials are entering the percentage calculation or if the company does any self verification of uncontrolled materials to decide whether the FSC-STD-40-005 shall be applied?	The requirement should be clarified!
8.5.2	T	Second sentence is inconsistent with clause 3.3.1, which defines sales of FSC W materials purchased as FSC CW is to be controlled under 40-004.	Remove “per FSC-STD-40-005” from the requirement.
8.5.2 & Generally	G	Generally and eg. 8.5.2 It should be clarified that FSC-STD-40-005 is only applicable when using an own CW verification programme. If companies buy material already controlled, so declared as FSC CW, FSC-STD-40-005 should not be relevant.	Clearly define when FSC-STD-40-005 is applicable and needs to be in the scope of the certificate. FSC-STD-40-005 should contain only purchase relevant requirements and should be adjusted to the requirements of the EUTR and other timber legality laws.
9.0 Credit system	G	9 scenario b) This example is not easy to understand, especially when taking in consideration 7.1.2. Is it a mistake? Maybe there is confusion on Solid Wood Credit Account and MDF Credit Account.	
9.0 Credit system	E	Illustration is informative and not a normative requirement.	Move diagram to an appendix/annex
9.0 Credit system	G	CTIB-TCHN supports the new definition of credit system.	
9.0 Credit system		9., scenario B: It is not clear why in a credit account of a trader, solid wood board credits (input) may used for the sale of a totally different product group (MDF / not solid wood)??	
9.0 Credit system	T	9 Credit system Scenario C Product group based on multiple input credit account s(applicable to manufacturers)	This should also be applicable for multiple credit accounts but from the same product group (cfr corrugated sheets as input material but with FSC MIX Credit and FSC MIX 70 % account)
9.0 Credit system	G	9 scenario b) This example is not easy to understand, especially when taking in consideration 7.1.2. Is it a mistake? Maybe there is confusion on Solid Wood Credit Account and MDF Credit Account.	

9.0 Credit system	R	The situation in the paper industry should be outlined as a possible scenario in the standard as well.	Expansion of the figure an example for scenario of the paper industry
9.0 Credit system	T	On the picture in Scenario C example it is shown that 10 m3 of MDF FSC Mix 70% was used as an input material. Same 10 m3 were put on the credit account. Seems that there is a mistake, and on the credit account should be not 10 m3 but 7 m3 , as MDF contains only 70% of FSC certified material. Thus the usage of full volume of MDF in this example contradicts with p. 9.4.1. Table, line 3, where it is said that for FSC Mix x% or FSC Recycled x% input material “Counts as the percentage as stated on the supplier invoice”.	The mistake needs to be corrected. Thus there should be not 10 m3 but 7 m3 on a credit account. Therefore if 4 m3 were used (as stated in the example) 3 m3 and not 6 m3 are left on a credit account at the end.
9.0 Credit system		The scenario c is not marketable because in many scopes the real availability of certificated material is not given. This reduces evidently the volume of FSC certificated products.	
9.0 Credit system	T	Input of credits at the credit account may be useless	<p><u>Background consequence</u> IKEA Industry will use one of our furniture factory in Zbąszynek, Poland as an example in order to highlight the consequence regarding the credit system, if the new draft of standard will be implemented.</p> <p>At present (existing standard, FSC-STD-40-004 v2.1) we have one credit account for every group of final products within the credit system. To sell product with FSC claim we need credits at the group credit account.</p> <p>According to the draft FSC-STD-40-004 Version 3-0 1-0 we need to have separate credit accounts for each group of incoming materials (boards, honeycomb, paper foil, dowels etc.) in our furniture production. In order to sell product with FSC claim we need credits on all relevant credit accounts.</p> <p>If Zbąszynek e.g. is purchasing paper foil with only Controlled Wood and all other material with FSC Mix Credit, it will impossible to sell any furniture as FSC Mix Credit, because we don't have any credits at paper foil's credit account. It means that all credits from all accounts will be useless if one of the used materials is only Controlled Wood.</p> <p><u>Proposed change of Credit System</u> IKEA Industry propose a change so it is possible in the new standard to make claim on outgoing products even if some incoming material just are bought as Controlled Wood. Otherwise the producers will lose all credits on the credit account. The general calculation regarding</p>

			input/output of Controlled Wood and FSC Mix (X%) at the credit account must be the same as it is in existing standard, FSC-STD-40-004 v2.1, so credits not are not lost.
9.0 credit system	E	(scenarios) not possible to read when printed	Improve the resolution
9.0 credit system	T	*Credit system: Doubts about the draft standard: 9.1.3 Traders cannot participate.  Is allowed share credits for input credit accounts? 9.3.2- what kind of quality aspects? What is the purpose of quality requirement? Definition of ecoregion is not applicable to plantation, as the raw material in any ecoregion has the same type of wood (in the case plantation). A reference of ecoregion is needed to be included Traders won't be able to use cross credit because of b) and c)	9.3.2. Clarify what kind of quality aspect this requirement wants to focus.  9.1.3. Item b and c are not applicable to Traders Item b is not applicable to plantation
9.0 Credit system	T	The credit system diagrams do not show controlled inputs into credit system. Credit system diagrams do not show remainder production. This leads to confusion.	Add CW inputs to credit diagrams. Elaborate on what types of operations each scenario applies to instead of singular examples. This will help certificate holders meet the intent of the standard.
9.0 Credit System	G-T	For mix Credit systems, is there a requirement that the input material that is not FSC is Controlled?	Add something about Controlled Wood
9.0 Credit System	E	The diagram is not possible to read when printed	Improve the resolution
9.0 Credit System	T	Scenario B identifies the output as MDF when the picture is of lumber. Scenario C does not follow requirements in table G. The MDF is not valued at 70% of the volume for inputs to the account.	Make revisions to reflect the standard requirements.
9.0 Credit System	G	Rainforest Alliance supports the simplification of the credit system by the following measures:  <ul style="list-style-type: none"> <li>• Limit the applicability of the credit system to the product groups of primary manufacturers.</li> <li>• Ensure accurate and tight conversion factors to avoid inflation of available credits</li> <li>• Introduce a % threshold for FSC 100% inputs to bring integrity to</li> </ul>	Ensure revisions to the credit system requirements are contributing to the objectives of the overall FSC strategy.

		the FSC Mix label and provide demand for more FSC certified forests.	
9.0 Credit System	E	The presentation of example scenarios of application of the credit system is useful, but does not seem to fit into the normal practice of standards writing. These illustrative examples should be placed in an informative annex.	Move example scenarios illustrations into an annex.
9.0 Credit System	E	Scenario A. Scenario B. Scenario C.	Scenario A: Scenario B: Scenario C; (To be consistent with sections 7 and 8.)
9.0 Credit System	E	Scenario A, B & C Use of Capital "M" or small "m" for "meters" should be consistent throughout the document. According to International System of Units, small letter m should be used. Consistency also needed for if a space is needed before "m3" or not. I can see 4m3 as well as 4 m3.	
9.0 Credit System	E	Credit account Solid Wood Conversion factor: not applicable. 4m3 withdrawn from MDF credit account Output :4m3 of MDF.  Consistency needed. From the picture, it looks like Solid wood is the right one.	
9.0 Credit System	G	UPM supports the new definition of the credit system.	
9.0 Credit System	G	UPM supports the new definition of the credit system.	
9.0 Credit System	G	UPM supports the new definition of the credit system.	
9.0 Credit System	G	Scenario C: There should be added an example of situation of Paper industry in the graphic.	
9.0 Credit System	E	Printing this off on a high quality printer on standard paper, the smallest text is not legible.	Enlarge smallest print
9.0 Credit System	E	An editorial issue with the titles in the examples seems to have been made twice. This is trading so MDF in will equal MDF out.	'CREDIT ACCOUNT SOLID WOOD' should be changed to 'CREDIT ACCOUNT MDF'
9.0 Credit System	G	Credit system: Explanations of scenarios exclude components according to FSC-Controlled wood standard (FSC-CW, company own verification systems) Exclusion would lead to a dramatic reduction of availability of certified raw material and would put certification of entire companies into question!	Due to de facto available amount of certified material include a scenario components according to FSC-Controlled wood standard (FSC-CW, company own verification systems).
9.0 credit system	T	Removal of facility for timber traders (without physical possession) welcomed by BM TRADA	
9.0 credit system	G	CEPI supports the new definition of the credit system.	
9.0 credit system	G	There should be added an example of the situation of paper and print industry in the diagram.	



9.0 credit system	T	Not sure what the figure applicable to manufacturers actually means. Does this mean we have to withdraw from the credit account based on the amount of products produced (not volume – like traders)?	This should be left as is. Not sure what the figure implies – not clear. Clarify how credits will be withdrawn from credit account for manufacturers as the diagram is not clear. Should be simple. Scenario B indicates credit systems are applicable to traders, but earlier, in section 7.1.2 the document states that the transfer systems shall be the only FSC control system applicable to... b) trading, distribution, and retail of finished products and paper.” This is inconsistent- which one is true?
9.0 credit system	G	WE support the new definition of the credit system.	
9.0 credit system	G	CEPI supports the new definition of the credit system.	
9.1.2	G	We strongly support the possibility to apply credit system at the level of single and multi-site taking into account our comments to 9.1.3.below	
9.1.2		Generally support introduction of cross-site credit sharing if appropriate and effective safeguards are implemented (e.g. It will help to label FSC mix credit products that currently reach the market without label. Other positive outcomes of the suggested change would be that higher volume of virgin material that currently is not FSC certified or FSC Controlled Wood will be required to conform with the applicable requirements of FSC-STD-40-005 in order to avoid controversial sourcing within those sites part of the multi-site certificate. In addition it might reduce physical transportation between mills in order to use the credits.).	
9.1.2 & 9.1.3	G	The introduction of cross-site credit sharing - credit system may be applied at the level of single and multiple sites (“shared credit accounts”) – shall be supported strongly since a lot of companies are producing in multiple sites.	-
9.1.2 & 9.1.3	G	The introduction of cross-site credit sharing - credit system may be applied at the level of single and multiple sites (“shared credit accounts”) – shall be supported strongly since a lot of companies are producing in multiple sites.	-
9.1.2 & 9.1.3	G	The introduction of cross-site credit sharing - credit system may be applied at the level of single and multiple sites (“shared credit accounts”) – shall be supported strongly since a lot of companies are producing in multiple sites.	-
9.1.1	G	Enabling a cross site credit is something very positive and a consequent step following the credit system.	
9.1.2	G	We strongly support the introduction of the possibility for “shared credit accounts”	
9.1.2	G	CEPI supports the applicability of the credit system to single and multiple sites. This will be even more important due to the uncertainty in supply of certified and controlled wood as the new FSC NRA process is rolled out.	
9.1.2	G	The introduction of cross-site credit sharing - credit system may be applied at the level of single and multiple sites (“shared credit accounts”) – shall be supported strongly since a lot of companies are producing in multiple sites.	
9.1.2	G	The cross-credit concept is sensible and pragmatic. It avoids the need to move raw material pointlessly around sites in order to make credit claims. The credit system was never about what certified material was actually in the product, more about a company’s overall commitment to purchase certified products. The integrity of the	

		credit system is not compromised by this concept.	
9.1.2	T	Central Credit Accounting: To put the FSC program on a level playing field with other credible CoC certification programs, FSC should allow Central Banking of Certified Credit Volumes.	
9.1.2	T	I agree with shared credit accounts.	-
9.1.2	G	CEPI supports the applicability of the credit system to single and multiple sites. This will be even more important due to the uncertainty in supply of certified and controlled wood as the new FSC NRA process is rolled out.	
9.1.2	G	CTIB-TCHN supports the “shared credit accounts”.	
9.1.2	G	We support the inclusion of shared credit accounts in the FSC CoC	None
9.1.2	T	ETS supports the applicability of the credit system to single and multiple sites. This will be even more important due to the uncertainty in supply of certified and Controlled Wood as the new FSC CW NRA process is rolled out	
9.1.2	G	We are strongly against the proposal to introduce cross-site sharing of credits, as it amplifies the potential for abuse of the credit system even further. And we’re quite frankly very disappointed to see cross-site sharing of credits in this standard at this time, how and why it has been included without broader consultation knowing how controversial it is we don’t know, but it is very frustrating! The credit system has already given room for abuse due to intentional misinterpretation of the old standard. Allowing increased flexibility by sharing of credits across sites is a recipe for further abuse.	Remove criteria 9.1.2
9.1.2	T	There should be a definition of an “ecoregion” or a suggestion, how to determine borders of that ecoregion.	Provide a definition of an “ecoregion” or sources for identifying it.
9.1.2	G	Agree with cross site credit sharing as long as it is supported by results of the pilot project	
9.1.2	G	In general there appears to be a lot of support from North American stakeholders for the proposal to introduce shared credit accounting into the FSC COC system. The proposal will benefit certificate holders as well as provide environmental benefits, given that the need to transport material simply to move credits between sites will be reduced, thus resulting in greenhouse gas emissions reductions. The proposal will also likely lead to better market penetration of FSC products through more efficient application of FSC credits.	
9.1.2	G	We support the inclusion of shared credit accounts.	No change required.
9.1.2	G	Cross-site sharing of credits. Consistent with our position on this for many years, we are strongly opposed to the proposal to introduce cross-site sharing of credits, as it greatly increases the potential for abuse of the credit system, which is currently already being abused. No environmental or social benefits have been demonstrated for cross-site sharing and it greatly increases the risk of further abuse.	Delete 9.1.2
9.1.2		This is a very good change. This will cut down on fossil fuel usage that has been required to move lumber and credits to our customers. With this change we can supply FSC MIX Credit material to our customer from our nearest facility saving both them and us time and money and saving or not using fossil fuels needlessly.	
9.1.2	E	Safeguards are mentioned in the Note after 9.1.3c but are not actually shown in 9.1.2	I presume that this is a mistake in drafting perhaps caused by multiple

			edits of this very controversial subject of shared credits
9.1.2	T	I do not agree at all; different sites usually produce different products with different conversion factor	
9.1.2	G	We strongly support the possibility to apply credit system at the level of single and multi-site taking into account our comments to 9.1.3.below	
9.1.2	G	We strongly support the possibility to apply credit system at the level of single and multi-site taking into account our comments to 9.1.3.below	
9.1.2	G	We strongly support the possibility to apply credit system at the level of single and multi-site taking into account our comments to 9.1.3.below	
9.1.2	T	9.1.2 should be included in clause 9.1.3, because standing alone it creates no requirements and cannot be evaluated during audits.	
9.1.2	G	We support implementation of "shared credit accounts", they will allow for additional flexibility and simplification of the manufacture and distribution of finished product.	Keep as worded.
9.1.2	G	The Cross-site Credit Pilot Project was a useful exercise that proved the shared credit account process works and is an effective way to boost the amount of labelled FSC material entering the marketplace. RockTenn is supportive of this Pilot Project being included in the Chain of Custody standard, and believe it is a useful tool that should continue to be available to companies.	Incorporate the Cross-site Credit Pilot Project into the Chain of Custody document.
9.1.2	G	Strongly approve of this addition / This will allow more production of FSC certified products to be generated by sites sharing a common wood basket, especially during wet seasons when one site may be located in an area with timber on more moderate weather logging opportunities.	We strongly endorse this change to the standard. Please retain it in the draft.
9.1.2	G	We strongly support the possibility to apply credit system at the level of single and multi-site taking into account our comments to 9.1.3.below The possibility is of essential importance also to wood procurement organisations	
9.1.2	E	TNC believes that cross-site credit sharing will be positive for the system, in terms of getting more certified material in the marketplace and cutting down on potential transport emissions, so long as there are safeguards in place, such as the OCP or alternative system to track inputs/outputs of products that enable conformance with FSC Standards.	
9.1.2	G	UPM strongly supports the possibility to apply credit system at the level of single and multi-site taking into account our comments to 9.1.3.below	
9.1.2	G	UPM strongly supports the possibility to apply credit system at the level of single and multi-site taking into account our comments to 9.1.3.below	
9.1.2	G	UPM strongly supports the possibility to apply credit system at the level of single and multi-site taking into account our comments to 9.1.3.below	
9.1.2	G	It is not clear why using the same "shared account" principle cannot be used in Percentage system.	We would suggest to use shared percentage calculations also at the level of multiple sites.
9.1.2	G	WEPA welcomes the possibility to use the cross-site system for sharing credits within a multiple site.	
9.1.2	G	I am supportive of the cross-site credit pilot project and its controls.	Supportive of clause as written. Sensible solution to increasing the visibility of the FSC brand.

9.1.2	G	We wish to express support to the following proposed revisions to FSC-STD-40-004 V3-0 EN found Part 6, Sales, and Part 9, Credit System – <ul style="list-style-type: none"> <li>• 9.1.2 – Implementation of “shared credit accounts” will allow for additional flexibility and simplification of the manufacture and distribution of finished product. This is a significant benefit to manufacturers such as us that produce branded products at different facilities but that are manufactured and packaged based on a single product specification and quality standard.</li> </ul>	
9.1.2 & 9.1.3		The Cross-site Credit Pilot Project was a useful exercise that proved the shared credit account process works and is an effective way to boost the amount of labelled FSC material entering the marketplace. This is a useful tool that should continue to be available to companies.  The term ecoregion is not defined in 9.1.3 and should be stricken from the document. A country level restriction can also be problematic for North America, where there is a large shared border between two countries that have very similar forests and in some cases share raw material sourcing across the border.	Incorporate the Cross-site Credit Pilot Project into the Chain of Custody document.  Strike 9.1.3 b)
9.1.2 & 9.1.3	G	The introduction of cross-site credit sharing - credit system may be applied at the level of single and multiple sites (“shared credit accounts”) – shall be supported strongly since a lot of companies are producing in multiple sites.	-
9.1.2 & 9.1.3	G	The introduction of cross-site credit sharing - credit system may be applied at the level of single and multiple sites (“shared credit accounts”) – shall be supported strongly since a lot of companies are producing in multiple sites.	-
9.1.2 & 9.1.3	G	The introduction of cross-site credit sharing - credit system may be applied at the level of single and multiple sites (“shared credit accounts”) – shall be supported strongly since a lot of companies are producing in multiple sites.	-
9.1.2 and 9.1.3	G	The idea of “Shared credit accounts” is completely contrary to the new limitations of the credit system in the draft. On the one hand misuse shall be avoided by hard restrictions, on the other hand multiple site accounts shall be allowed. The intention is not understandable. What is the goal? Will there be a possibility to trade FSC credits in the future?	Do not open the risky option of multiple site accounts, with the exception of “single certificates with multiple sites” as defined in FSC-STD-40-003 V2-1 chapter 1. See above.
9.1.2 and 9.1.3		Shared Credit Accounts: GPI is supportive of this Pilot Project being included in the Chain of Custody standard, and believe it is a useful tool that should continue to be available to companies The Cross-site Credit Pilot Project was a useful exercise that proved the shared credit account process works and is an effective way to boost the amount of labelled FSC material entering the marketplace.	Incorporate the Cross-site Credit Pilot Project into the Chain of Custody document.

9.1.2, 9.1.3	G	<p>We totally support the proposal for a shared credit system. We participated in the pilot project and saw the benefits of this approach for our eastern Quebec mill. The tenure regime in eastern Quebec in the vicinity of our eastern operations has made progress on FSC forest management certification challenging. We receive wood from over 15 public land tenures with commonly 12-15 beneficiaries. On private lands, owners are represented by cooperatives and wood marketing boards. Achieving a commitment to pursue FSC certification requires the participation of many parties. In comparison to the western region of Quebec where public land tenures average 1 million hectares in size and usually involve 2-4 major players, FSC progress requires the development of partnerships, negotiation of cost sharing arrangements and significant patience and effort. There is no question, that in the absence of Tembec pushing for FSC in eastern (Bas St-Laurent and Gaspésie regions) Québec, very little would be accomplished in the advancement of FSC certification. Tembec is providing management support (20% in kind contribution of staff), financial support to FSC initiatives as well as paying a premium for FSC certified fibre delivered or even paying directly the cost of maintaining COC certification. There is no doubt that the credit sharing project has resulted in more FSC product in the marketplace by increasing the sales of FSC certified pulp at our eastern mill and overall FSC sales for the two mills. There is no question in our mind that having the ability to share credits between sites will help increase our market shares of FSC certified products.</p> <p>However, we have concerns with the current preconditions that have been proposed. The current preconditions are limiting and could effectively make the system fairly useless to many multi-site certificate holders globally. Large primary manufacturer typically have sites located in different ecoregions, and limiting shared credit accounts to sites located within the same country and ecoregion may only be useful for some multi-site certificate holders in large countries. Many FSC certificate holders are located in smaller countries, like in the European Union where the precondition for country would prohibit the use of shared credit accounting. Further discussion is needed on the preconditions section, and alternative preconditions will need to be proposed. Alternatively, the requirements for setting up a credit account could be further specified. This would make credit accounts more consistent whether shared or not, and would clear up a lot of current confusion and differences of interpretation.</p>	<p>Keep the shared credit system in the version 3.0 of FSC-STD-40-004.</p> <p>Review the preconditions. Instead of ecoregion and country as preconditions, same product group and similar species are use in the manufacture of the product.</p>
9.1.2.	E	This indicator is useless as a separate requirement	To remove this indicator and to include this statement into 9.1.3.
9.1.3	G	<p>From the perspective of an auditor I do not support the idea of shared credit accounts between different sites, since it will be very difficult (if even possible) to verify the authenticity of the inputs and outputs of the credit accounts with a high grade of certainty, since in in case of a multisite only a sample of sites will be audited. During an auditing of a site specific credit account in a multisite it is possible to verify the credibility of the input and output volumes by a sample of supplier and sales documents. Therefore, the result shows only the element of uncertainty of the sampling approach and an appropriate rating of the functionality of the system at the audited site can be given. In case the credit accounts will be shared between different sites and only a sample of sites is audited in the annual audit, there will be the element of uncertainty related to the sample of documents audited at the site and, additionally, the element of uncertainty of the inputs of the other sites which are not audited and where the functionality of the system is not verified during the annual audit.</p>	The application of shared credit accounts should not be possible!

9.1.3	T	We strongly support the introduction of cross/site credit system. We agree with safeguard a).	
9.1.3	G	9.1.2 and 9.1.3 Shared Credit Accounts: The Cross-site Credit Pilot Project was a useful exercise that proved the shared credit account process works and is an effective way to boost the amount of labelled FSC material entering the marketplace. AF&PA is supportive of this Pilot Project being included in the Chain of Custody standard, and believe it is a useful tool that should continue to be available to companies.  The term ecoregion is not defined in 9.1.3 and should be stricken from the document. A country level restriction can also be problematic for North America, where there is a large shared border between two countries that have very similar forests and in some cases share raw material sourcing across the border.	Incorporate the Cross-site Credit Pilot Project into the Chain of Custody document.  Strike 9.1.3 b)
9.1.3	G	9.1.2, 9.1.3 We support the credit trading system and believe it could broaden the demand for FSC material into other geographical regions provided that certificate owners can trade within all their locations within the continent. Limiting to ecoregions hampers growth of FSC as most FSC certified forests are concentrated. By opening up trading between ecoregions it will expand demand for FSC material.	
9.1.3	T	The credit sharing provision is a positive opportunity, however the contribution percentage recommendation by the third party consultant with respect to the independent study should be considered.  In addition, the restriction of eco-region, within the same country is too narrow for a regional allowance. Too often, the need for credit sharing is the result of a low FSC supply regionally; restricting the opportunity to companies within eco-regions by country is unlikely to move the dial on FSC supply for many.	Change the 10% credit contribution threshold to 5%, as suggested by the independent consultant. Remove the regional restriction.
9.1.3	G	9.1.3 Shared credit accounts The limitation at ecoregion and country is not useful, and should be deleting.	
9.1.3	G	The main changes regarding cross site credit make good sense	
9.1.3	T	Credit Account Conditions: Delete 9.1.3b. The ecoregion requirement defeats the purpose of central credit accounting; the whole idea is to utilize credit in areas where FSC Certified Forests are very limited.	
9.1.3	G	9.1.2 and 9.1.3 We support this change to the standard and agree that the safeguards in 9.1.3 are adequate as risk is by country basis.	none
9.1.3	G	Cascades welcomed this decision and have always supported the cross-site credit sharing system.	
9.1.3	T	We strongly support the introduction of cross/site credit system. We agree with safeguard a).	
9.1.3	G	FSC Cross credit sharing should be allowed. Ecoregion and country requirements interfere with our ability to deliver all wood to retail as FSC. We need more flexibility and should have it given all of the tightening the system has endured over the last several year/audit cycles.  If we had 5% requirement and full sharing regardless of location within Canada and the U.S. we could wood retail with FSC at 100% fill rates. Presently we only sell a relatively small percentage of our over all inbound FSC 100% log supply to the market as FSC because fiber is not evenly placed to fit modern manufacturing and delivery context. In the end we need FSC wood to make this work...it will create an opportunity for firms to incrementally grow FSC product on retail shelves.	

9.1.3	G	We support the use of a cross site credit system. This could help with some of the issues mentioned in our comments of 9.3.5. This will increase the volume of FSC credits, by moving them to facilities that have the highest demand, but may be lacking credits.	
9.1.3		The current credit trading proposal is not usable. The system that was tested in the pilot of allowing credits to trade in like product groups within continents would be usable and provide value to FSC. Certified forest lands are heavily concentrated in a few geographies. By only allowing credit trading within those areas, the proposal offers no value. The 10% minimum is worthwhile to encourage development of local supply but with no ability to bring credits from outside the region the impetus to do so will be lessened.	
9.1.3	G	We support the shared credit account possibility. However, we do not fully agree with limiting the possibilities for sites within the same ecoregion and country. The pilot included also region, such as the EU. We understand and support the need for limitation when it comes to sourcing of fibers, however, for companies further down the value chain we would suggest to change this requirement. We suggest that companies sourcing semi-finished products for further processing (such as pulp and paper) rather limit the sites of the shared credit account depending on the supplier(s) used. As an example: a packaging company has 3 plants (Germany, Ukraine and Spain) and sources paperboard from two suppliers located in Sweden and Finland. Both suppliers deliver different products to all three plants. A shared credit account would simplify the logistics and supply coordination of the packaging company. The situation would be the same regardless of whether or not these packaging plants are in the same country.	Companies sourcing wood fiber must source this from the same ecoregion and country. Companies processing semi-finished material must source the material to all sites from the same suppliers / suppliers within one ecoregion/country/region.
9.1.3	T	While we support the proposal for a shared credit account system, we believe the current preconditions are limiting and could effectively make the system fairly useless to many multi-site certificate holders globally. Large primary manufacturer typically have sites located in different ecoregions, and limiting shared credit accounts to sites located within the same country may only be useful for some multi-site certificate holders in large countries. Many FSC certificate holders are located in smaller countries, like in the European Union where the precondition for country would prohibit the use of shared credit accounting. Additionally, preconditions based on location may only be relevant for primary manufacturers sourcing virgin material. Secondary manufacturers, manufacturers who use 100% recycled material, and distribution centers (DCs) should not be required to meet location parameters as there is little to no connection back to the ecoregion. Finally, multi-sites with credit accounts shared between manufacturers and DCs also demonstrates that the restriction on contributions to inputs does not work, since DCs do not contribute raw materials to the output product they are selling. However, we understand the need for some type of geographical limit to avoid misuse of the shared credit system and result in credit sharing would only be limited to where FSC certification is easiest to achieve.	The PSU should consider more discussion on the preconditions for credit sharing and offer some options during the next consultation. Other potential solutions include allowing broader geographical flexibility where local inputs contribute a higher percentage (e.g. at least 50%) of total input credits (as opposed to 10% for within ecoregion sharing).
9.1.3	G	Evergreen Packaging strongly supports FSC's inclusion of shared credit accounts under the credit system. We believe that this is an effective method to increase FSC material presence in the marketplace without a negative impact on the environment. Already, through the credit system, fiber from a certified forest may or may not actually be in the FSC Mix product. However, the attribute of certified material from a certified forest is retired and cannot be claimed for other uses. Allowing cross-site sharing operates in the same way but allows holders of a multi-site certificate greater flexibility and reduces unneeded movement of actual material (and associated fuel use and emissions) to address the current system	

		where cross-site sharing is not allowed.	
9.1.3	G	We strongly support the introduction of cross/site credit system. We agree with safeguard a).	
9.1.3	G	It is important that terms are used logically. In the normative part the terms are a multi-site and its shared credit accounts, whereas in the note for stakeholders the term is cross-site credit sharing / system. We can avoid misunderstandings only by using the same terms throughout the document.	
9.1.3	T	Cross site sharing should be possible, but it should also be auditable. The risk of incorrectly added credits should be avoided so the description of the material for which the credit account is, is very important.	
9.1.3	T	The FSC Cross Credit pilot test concluded: All sites participating in the multi-site credit sharing shall be located within the same ecoregion, country or region (E.g. European Union). Most participant support this pre-condition and also understand why such a condition is needed. The current draft says: b) All sites are located in the same ecoregion (e.g. Canadian boreal forests, Amazon river) and country. The current requirement in the draft is therefore not in line with the rest results.	Please replace “and” with “or”, so the wording is: b) All sites are located in the same ecoregion (e.g. Canadian boreal forests, Amazon river), region (E.g. European Union) or country.
9.1.3	T	Request for clarification: Does this mean that one credit account is meant for several production sites?	"mutual credit account"
9.1.3	G	We strongly support the introduction of cross/site credit system. We agree with safeguard a).	



9.1.3	G	<p>While there is general support for the proposal for a shared credit account system, there are concerns about the current preconditions that have been proposed. The current preconditions are limiting and could effectively make the system fairly useless to many multi-site certificate holders globally.</p> <p>Large primary manufacturers typically have sites located in different ecoregions, and limiting shared credit accounts to sites located within the same country may only be useful for some multi-site certificate holders in large countries. Many FSC certificate holders are located in smaller countries, like in the European Union where the precondition for country would prohibit the use of shared credit accounting.</p> <p>Additionally, preconditions based on location may only be relevant for primary manufacturers sourcing virgin material. Secondary manufacturers, manufacturers who use 100% recycled material, and distribution centers (DCs) should not be required to meet location parameters as there is little to no connection back to the ecoregion. Finally, multi-sites with credit accounts shared between manufacturers and DCs also demonstrates that the restriction on contributions to inputs does not work, since DCs do not contribute raw materials to the output product they are selling.</p> <p>Alternatively, there is also a recognition that having geographical constraints to the credit sharing ensures that market incentives for FM certification are not limited to where FSC certification is easiest to achieve. Other potential solutions include allowing broader geographical flexibility where local inputs contribute a higher percentage (e.g. at least 50%) of total input credits (as opposed to 10% for within ecoregion sharing).</p> <p>Further discussion is needed on the preconditions section, and alternative preconditions will need to be proposed prior to the next revision and second public consultation. Alternatively, the requirements for setting up a credit account could be further specified. This would make credit accounts more consistent whether shared or not, and would clear up a lot of current confusion and differences of interpretation.</p>	Review and evaluate alternative preconditions with the COC working group.
9.1.3	G	<p>9.1.3 b) and c)</p> <p>A certified organization has no influence on the forest certification in its region and should therefore not get any disadvantage.</p>	<p>c) Each site participating in a shared credit account shall contribute at least 5% of the input credits used by its own site in a twelve (12) month period.</p> <p>Variante 1: b) All sites are located in the same economical region (e.g. Canadian boreal forests, Amazon river) and country;</p> <p>Variante 2: b) All sites are located in the same region (e.g. Canadian boreal forests, Amazon river) and country;</p>
9.1.3		<p>Cross credit : It's a good idea but how it's possible to develop requirement around this project without prejudice to particular case. For example if a paper or panel group have 2 company on each side of the country border, it's not normal to forbidden cross credit. Another case is about cross credit between plantation south and country north.</p>	<p>As project report provide please remove AND between eco-region and country and please take European union as a country because it's not the same size between different country !!!</p> <p>The real request is what is the acceptable distance between to 2 organization to cross credit ?</p>

9.1.3	G	Without maps and definitions of ecoregions disclosed it is not possible to determine the impacts on our certificate. The standard reads like it was mostly developed for primary manufacturers. Currently the credit system is also applied to lumber distributors and converting. These businesses have no link back to the forest in relation to the ecoregion they are located. Because the credit system has been interpreted differently by many companies and CB's we are not starting on a level playing field to add this incentive to begin with. The level where credit systems are allowed at a global level should be examined and what type of company they are. Credit sharing that is equal to both primary mills and secondary manufacturers should be proposed.	Disclose maps and boundaries of credit share prior to moving forward in a positive or negative manner so that CH's can adequately gauge impact and the introduction of the concept for this incentive starts from a level and transparent playing field where all certificate holders can weigh in appropriately.
9.1.3	T	The term ecoregion may cause impact mainly to native forests due to the cultivation process which affects a specific biome and community. The limitations specified in items b (country) and c (10%) exclude export traders. Also a clarification is missing to non-compliance products when the exchange of credits between units is applied.	The suggestion is to have different requirements to export traders and industries with inputs originated from forest plantation, once requirements of items b and c will not enable cross credit to these companies.
9.1.3	T	It is probably too hard for CBs to ensure that companies engaged in cross-site credit sharing are not cheating the system by inflating the number of credits available to them. To safeguard against this, companies that do cross-site credit sharing should have to use the OCP.	Add a new section 9.1.3 d) as follows: 9.1.3 d) For shared credit accounts, the organization shall verify that its recorded FSC input claims match the recorded FSC certified output claims of its suppliers using the FSC Online Claims Platform (ocp.fsc.org)
9.1.3	T	I share the concern of several Environmental Chamber members, as summarised in Jason Grant's comment - 'It will be difficult for CBs to ensure that companies engaged in cross-site credit sharing are not cheating the system by inflating the number of credits available to them. To safeguard against this, companies that do cross-site credit sharing should have to use the OCP.' I agree completely that OCP or an equivalent volume tracking system should be obligatory and fully operational across all sites if there is cross-site credit sharing, but I would much prefer elimination of credit and acceptance only of the transfer system	I agree with Jason Grant's changes – 'Add a new section 9.1.3 d) as follows:  '9.1.3 d) For shared credit accounts, the organization shall verify that its recorded FSC input claims match the recorded FSC certified output claims of its suppliers using the FSC Online Claims Platform (ocp.fsc.org).'
9.1.3	T	The term ecoregion may cause impact mainly to native forests due to the cultivation process which affects a specific biome and community. The limitations specified in items b (country) and c (10%) exclude export traders. Also a clarification is missing to non-compliance products when the exchange of credits between units is applied.	The suggestion is to have different requirements to export traders and industries with inputs originated from forest plantation, once requirements of items b and c will not enable cross credit to these companies.
9.1.3	T	New rules would allow shared credit accounts to only have 10% inputs of their 12 month sales – is the 10% inputs split up by product group? This would allow companies to sell 90% of their FSC products without ever potentially having the raw materials they are selling on site which seems very loose. Would 9.3.3 be considered as part of enforcing this rule as well, freight is going to have a big effect on raw material cost. If a raw material is plentiful on the West Coast but not the East Coast how would this new rule be enforced in the credit account?	
9.1.3	T	It appears that credit accounts can be shared within sites with a common ownership – could they have different activities (i.e. mills and distribution)?	Section 9.1.3 appears to allow for this just wanted to clarify. Also – yes – we think this is a very wise idea to increase the available FSC supply to consumers.

9.1.3	G	It is important that terms are used logically. In the normative part the terms are a multi-site and its shared credit accounts, whereas in the note for stakeholders the term is cross-site credit sharing / system. We can avoid misunderstandings only by using the same terms throughout the document.	
9.1.3	G	It is important that terms are used logically. In the normative part the terms are a multi-site and its shared credit accounts, whereas in the note for stakeholders the term is cross-site credit sharing / system. We can avoid misunderstandings only by using the same terms throughout the document.	
9.1.3	G	It is important that terms are used logically. In the normative part the terms are a multi-site and its shared credit accounts, whereas in the note for stakeholders the term is cross-site credit sharing / system. We can avoid misunderstandings only by using the same terms throughout the document.	
9.1.3		I was very happy to see, that “our pilot project” has been integrated into the new standard. Perhaps you can consider implementing this also in the percentage system?	
9.1.3	T	Cross-site credit sharing is completely unacceptable because there is no existing mechanism for transparent auditing. The reality is that companies can cheat. Auditing is already and FSC week spot. This would allow serious rorting into the system that an already sub-standard auditing process is unlikely to pick up.	Delete all references to cross-site credit sharing.
9.1.3	G	All sites are located in the same ecoregion (e.g. Canadian Boreal Forest, Amazon river) and country should rephrases to “All sites are located in the same ecoregion or country or Multiple countries with a single domestic markets like EU ( similar laws / no border control)”	
9.1.3		No take a minimum %, some times needs a small pieces decoratives in the products.	
9.1.3	T	Rainforest Alliance is not opposed to the idea of credit sharing, as it can aid many companies in using available FSC credits that would normally expire at one site and use them at a site that struggles to make FSC claims. This is especially true for primary manufacturers located in areas with little FSC FM certification However there are concerns that allowing credit sharing will decrease the demand for FSC FM Certification in areas that need growth. There are also concerns with secondary and tertiary manufacturers being able to use the credit sharing system. Location to certified forests is not necessarily an issue due to their business processes.	Rainforest Alliance proposes the following: • Limit 9.1.3 to Primary Manufacturing to control the adverse effects of credit sharing. • Require a minimum percentage of FSC 100% inputs to ensure that the credit sharing system is not abused, and there still is pressure on local forests to become FSC certified.

9.1.3	G	<p>We support the introduction of cross-site credit sharing. We agree that safeguards introduced in 9.1.3.a and 9.1.3.c are adequate.</p> <p>We do not agree with the restrictions introduced in 9.1.3.b. Ecoregions is a much too narrow classification because the same inputs in terms of species may exist across multiple ecoregions. A mill could be situated in one ecoregion and source from multiple ecoregions. Country, as well, could in many cases be a too narrow classification. It is understandable in the example given that it would not be appropriate to share inputs from the Canadian boreal forests and the Amazon River. However in the example of North American mills that are located in close proximity to the US-Canadian border, and routinely source similar input materials from both sides of the border, it would make perfect sense to allow for these inputs to be combined.</p> <p>Suggest remove b) as it is of little value and completely impractical. In defining any restriction such as b) it is of questionable relevance which ecoregion the facility (site) is located, but rather the ecoregion(s) applicable to the district of origin which is/are the basis for the risk assessment. There are instances for example in which a facility is in Great lakes St Lawrence forest but the procurement (District of Origin) is primarily from the Boreal Forest.</p> <p>Is the concern for including item b not already covered by the requirement to define product groups and similar inputs?</p>	Delete item b
9.1.3	G	The term ecoregion is not defined in 9.1.3 and should be deleted from the document. A country level restriction can also be problematic for North America, where there is a large shared border between two countries that have very similar forests and in some cases share raw material sourcing across the border.	Strike 9.1.3 b)
9.1.3	T	Do all sites within a Multi-Site certificate have to participate in the credit sharing? / If one of the member sites is located in separate ecoregion from the others or cannot provide the 10% input credits, will this disqualify the other member sites from sharing between each other while excluding the separated site?	Add the following condition for future clarification:  d) All or a subset of member sites of a single Multi-Site certificate may participate in shared credit accounts.
9.1.3	E	The definition of eco-region is not clear and can be illogical. An Italian tissue mill processing only Brazilian Eucalyptus could share their credits with tissue based on Italian poplar pulp?	Define logical requirements for cross site credits, e.g. geographic Europe
9.1.3	G	We support the use of a cross site credit system. This could help with some of the issues mentioned in our comments of 9.3.5. This will increase the volume of FSC credits, by moving them to facilities that have the highest demand, but may be lacking credits.	
9.1.3	G	The shared credit option becomes unusable for most multi-site CHs, at least in North America, because of the single eco-region/country restriction.	Consider removing or easing the single eco-region and country restrictions.
9.1.3	G	It is important that terms are used logically. In the normative part the terms are a multi-site and its shared credit accounts, whereas in the note for stakeholders the term is cross-site credit sharing / system. We can avoid misunderstandings only by using the same terms throughout the document.	
9.1.3	T	However, we believe that cross-site credit sharing should be allowed to go beyond a given ecoregion, given that the sourcing area for a given site could be from all over. The location of the mill shouldn't matter. Regarding the sub-conditions in 9.1.3, the logic of point b) is unclear. The shared credit system would apply to all sites within the scope of a multisite certificate, independently of where these sites source from. Point b) is thus not about the sourcing, as it seems to imply, but about site location. Sourcing can come from different countries, especially with market pulp in the paper industry.	We suggest deleting or rephrasing the point. On the issue of sourcing, there is little risk to having mahogany receiving an FSC label instead of a pine wood in a shared credit approach, as the credit systems can be applied only to the same product group and for the same quality and value (9.3.2).
9.1.3	G	The addition of shared credit accounts is a positive move that may allow for the increased certification of products	However, should be limited to similar regions or within a province / state.

9.1.3	G	It is important that terms are used logically. In the normative part the terms are a multi-site and its shared credit accounts, whereas in the note for stakeholders the term is cross-site credit sharing / system. We can avoid misunderstandings only by using the same terms throughout the document.	
9.1.3	G	It is important that terms are used logically. In the normative part the terms are a multi-site and its shared credit accounts, whereas in the note for stakeholders the term is cross-site credit sharing / system. We can avoid misunderstandings only by using the same terms throughout the document.	
9.1.3	G	It is important that terms are used logically. In the normative part the terms are a multi-site and its shared credit accounts, whereas in the note for stakeholders the term is cross-site credit sharing / system. We can avoid misunderstandings only by using the same terms throughout the document.	
9.1.3	E	This addition to the Standard will increase sales of FSC certified products. This is a positive.	Credit sharing should be allowed among multi-site facilities in the same country, for simplicity. (9.1.3.b)
9.1.3	g	Credit pooling	Draft language is excellent. A great addition to standard
9.1.3	T	Clearing necessary: Is it possible to have only one credit account for several production sites?	common credit account
9.1.3	T	Country is too restrictive, especially in the case of European companies with several subsidiaries in different countries, but mainly with the same procurement areas. The important criteria is not the location of the manufacturing site, but the origin of harvested wood.	All sites are located in the same ecoregion (e.g. Canadian boreal forests, Amazon river) or continent (Europe).
9.1.3	T	We support the initiative to allow sharing credit accounts.	Recommendations to further clarify the requirements for shared accounts; 1. Further Define ecoregions. What is the definitive source to identify ecoregions? 2. Remove, c) the 10% threshold requirement for each participating site, as a) already requires common ownership, which should requires central control of the credit account regardless if a particular site contributes towards the volume credit account.
9.1.3	T	We strongly support the introduction of cross/site credit system. We agree with safeguard a).	
9.1.3	G	The limitation at ecoregion and country is not useful, and should be deleting.	
9.1.3		We support the use of shared credit accounts. However, there should be further consideration given to the site location requirements. Consideration might be given to a defined geographical proximity (or distance to each other) in place of ecoregion borders within a country (there is no restriction to sourcing of credits across ecoregion borders, so the use of this criteria in credit accounting across sites is not fully understood).	Remove ecoregion requirement
9.1.3 (b)	T	We would like to note that "country" in some cases probably is too small scale. E.g. European Union has common market, currency, etc. Therefore we think that more wide implication shall be used.	We would suggest to change word "country" to more wide implication.
9.1.3 a)	G	Type of manufacturer which can be applicable shared credit accounts is unclear. I heard in the webinar, that the shared credit accounts may only be applied to primary manufacturer. If it is correct, applicable manufacturer should be defined.	New clause; All sites are primary manufacturer;

9.1.3 b	G	Shared credit accounts: It's not important where the site physically is located. It's important where the site source their wood or raw material from. From different forest types or from equal forest types. If the text says "and" country the credit account can only be shared within one single country	FSC and the technical working group must discuss the effect of shared credit accounts depending on how the boundaries are set: Ecoregion, country, sourcing area (countries) Maybe shared credit accounts can only be applied if you use Input-based credit accounts?
9.1.3 b)	G	As it is stated, it narrows quite strongly the possibility of a shared credit account with operations in Europe, as an example.	All sites located in a group of countries with common characteristics as sharing the same type of geographical and environmental traits, political and/or monetary system (e.g. European Union).
9.1.3 b)	T	It is unclear as to what sites can actually use the shared credit accounts. The clause as written is very limiting as it would apply only to multi-sites located in the same ecoregion and country. I do not believe that this was the actual intent and that the focus should be on similar manufacturing sites using similar eligible inputs such as tree species from a given ecoregion.	
9.1.3 b)	G	The reason why all sites should be located in the same eco region is unclear. Input materials allowed to credit system are defined enough in 9.3.2, 9.3.4 and 9.3.5. Condition "in the same ecoregion" has no practical mean.	b) All sites are located in the same country;
9.1.3 b)	T	Ecoregion is not a familiar term for most CoC CHs. The condition when ecoregion should be used instead of country must be clarified here otherwise no one will understand correctly why ecoregion is included here.	
9.1.3 b)	G/T	It does not make sense to require sites to be in the same ecoregion to have a shared account, because you can use materials from all over the world in each production site. We think that it should be fine to have a globally shared credit account, as long as a) and c) are fulfilled, and the raw material used in the production sites is the same (for example paperboard made of a certain quality). The requirement regarding the raw material is ensured through 9.3.2 and 9.3.3.	Delete 9.1.3 b)
9.1.3 b)	T	The wording of the clause does not correspond to the pilot test setup. According to the pilot test setup;  "All sites shall be located within the same eco-region, country or administrative region (e.g. European Union)."  According to this, the sites are in either the same region or country. In the proposed draft the wording has changed to:  "All sites are located in the same ecoregion (e.g. Canadian boreal forests, Amazon river) and country"  According to this, the sites must be located in the same country.  For a multinational company like VELUX this change eliminates the benefits of the cross-site credit model i.e. the cross-site credit model is made inapplicable for VELUX and expectedly all other multinational companies.	Allow the sites participating in a cross-site credit setup to be located in individual countries but inside the same region e.g. the EU.

9.1.3 b)		Unclear. The shared credit system would apply to all sites within the scope of a multisite certificate, independently of where these sites source from. Point b) is thus not about the sourcing, as it seems to imply, but about site location. Sourcing can come from different countries, especially with market pulp in the paper industry. So Why limit this scope to an ecoregion then?  If the intent of this section is to mean sourcing area, ecoregion is not feasible, and country might be unfair to small countries, but perhaps region such as N. America, S. America, Western Europe, Eastern Europe, SE Asia, etc.	Delete or rephrase the point.
9.1.3 b)	G	On a risk based validation of regions of the world this method should be only allowed within the European economic area.	
9.1.3 b)	T	A clearer definition of ecoregion is required. Country is too restrictive in the case of Europe.	All sites are located in the same ecoregion (e.g. Canadian boreal forests, Amazon river) or continent (Europe)
9.1.3 b)	T	As it is stated, it narrows quite strongly the possibility of a shared credit account with operations in Europe, as an example.	All sites located in a group of countries with common characteristics as sharing the same type of geographical and environmental traits, political and/or monetary system (e.g. European Union).
9.1.3 b)	G	We wish to express support to the following proposed revisions to FSC-STD-40-004 V3-0 EN found Part 6, Sales, and Part 9, Credit System – • 9.1.3.b) - Definition of “same ecoregion” is undefined and places unnecessary constraints on manufacturing flexibility for eligibility in the shared credit account. We recommend that the ecoregion requirement be eliminated.	
9.1.3 b) and c)	G	A certified organization has no influence on the forest certification in its region and should therefore not get any disadvantage.	c) Each site participating in a shared credit account shall contribute at least <b>5%</b> of the input credits used by its own site in a twelve (12) month period.  Variante 1: b) All sites are located in the same <b>economical</b> region (e.g. Canadian boreal forests, Amazon river) and country; Variante 2: b) All sites are located in the same <b>region</b> (e.g. Canadian boreal forests, Amazon river) and country;
9.1.3 b) and c)	G	A certified organization has no influence on the forest certification in its region and should therefore not get any disadvantage.	c) Each site participating in a shared credit account shall contribute at least 5% of the input credits used by its own site in a twelve (12) month period.  b) All sites are located in the same region (e.g. Canadian boreal forests, Amazon river) and country;
9.1.3 b) and c)	G	A certified organization has no influence on the forest certification in its region and should therefore not get any disadvantage.	c) Each site participating in a shared credit account shall contribute at least 5% of the input credits used by its own site in a twelve (12) month period. b) All sites are located in the same economical region (e.g. Canadian boreal forests, Amazon river) and

			country;
9.1.3 b)+c)	G	Shared credit accounts...b) all sites are located in the same eco-region and country. à This requirement is a case of unequal treatment of companies with sites in bigger or smaller countries. The shared credit accounts between sites in different countries can also generate a big contribution to reduce the CO2 emission for the transport of FSC-certified wood. By using FSC wood from Nordrhein-Westfalen over a shared account in a chip board production site in Tirol, the physical transport of FSC wood from Switzerland to the site in Tirol would be no longer necessary. Generally the limitation at eco-region and country is not useful, and should be deleted.	Shared credit Accounts...b) all sites are located in the same eco-or economical- region (for example in the European Union) c) Each site participating in a shared credit account shall contribute at least 5% of the input credits used by its own site in a twelve (12) month period.
9.1.3 c	G	10% in 12 months should maybe correspond to 9.4.3 (the 5 year suggestion)	Discuss this further during the process
9.1.3 c)	T	The requirement that; “Each site participating in a shared credit account shall contribute at least 10% of the input credits used by its own site in a twelve (12) month period.” is according to the FSC guidance on implementation of cross-site credits pilot tests only applicable to the sites that have physical possession and/or transform products, through manufacturing, mixing or changing the composition of the products. The company’s sites that do not have physical possession and/or trade or distribute finished products are exempt to comply with this requirement.	It is essential for the applicability of the cross-site credit set-up to pass on the exceptions applied in the FSC guidance on the implementation of the cross-site credit pilot to the revised CoC standard.
9.1.3 c)	G	The restriction in respect of 10% input-material in each site has to be refused. This restriction disagrees to the basic idea of “shared credit accounts”. Based on this restriction a practicable and economically justifiable implementation is not possible and therefore will not lead to the wanted result.	



9.1.3 c)	T	<p>The inclusion of the possibility to crosscredits on the CoC standard creates an opportunity to generate a wide range of positive direct and indirect impacts that deserve to be identified: 1. Economic benefits: - Optimization of the logistics and reduction of transportation costs, with transportation of raw-materials and products. Multi-site certified companies do perform sub-optimal raw material transport operations. In reality, in order to fulfil customer demand for certified products, normal supply stream has to be handled, increasing in a substantial manner the average kilometre per unit of product, particularly in areas where procurement for certified raw material is more difficult (as, for instance, in regions with highly fragmented ownership). This situation, from one end, leads to a loss of competitiveness while consuming considerable financial resources that could be made available in capacity building initiatives to increase the area under certified forest management.- Not being able to cross credits and optimize logistics contributes to put at risk the efforts to encourage micro and small landowners towards FSC certification, especially in cases where and in situations when, competitiveness of manufacturing companies is under global market pressure. 2. Environmental benefits: - Reduction of the carbon footprint (less emissions of fossil carbon) due to elimination of unnecessary wood and final product “travelling”: efforts made to reduce such unnecessary transportations will reduce CO2 emissions and the global environmental footprint of forest products, production and manufacturing. 3. Social benefits: - Increased health &amp; safety is expected from reduced transportation of materials due to lower accident risk.- Road conservation and general safety conditions are, as widely recognized, inversely relate with traffic intensity therefore effort in optimal raw material flow is an important aspect for sustainable operations. 4. Benefits for the FSC system: - The credits sharing system leads to an optimization and best use of available credits (sometimes credits are wasted in a site because of the logistics needs for optimization) and increased control of credits. - It should be emphasized that credits shared within such a system always involve certified wood or other forest products, thus having no negative impact on the credibility of the FSC system. On the contrary, it brings all the added benefits explained above. - Reduction of transportation costs could generate additional financial resources for the promotion of responsible forest management in the ground, particularly where it is most needed, as for example, in areas managed by micro and small landowners</p>	Delete.
9.1.3. (b)	T	<p>Agree, that this indicator should allow shared credit amounts within one multi-site certificate if the production units are located in the same ecoregion, BUT it should not be limited to a single country!!! In the case of European Union it does not make sense. Multi-site CoC certificates are not limited to one country!!! Therefore it is also logic to have shared credit amounts not limited to a single country.</p>	<p>To fully remove a limitation of one single country and to keep only limitation by the scope of one multi-site certificate and the scope of one ecoregion. OR to extend the geographic scope up to a supranational formations/unions (e.g. European Union). + It is also important to add a NOTE with a link to a website with applicable classification of ecoregions.</p>
9.1.3. b)	T	<p>In order to get a real benefit of the shared credit accounts e.g in Europe the location of the sites cannot be restricted to an ecoregion and a country. The suggested formulation puts organizations into very different situation depending on the location.</p>	<p>Modification: (remove red text) All sites are located in the same ecoregion <b>and country</b> or continent.</p>

9.1.3. b)	T	In order to get a real benefit of the shared credit accounts e.g in Europe the location of the sites cannot be restricted to an ecoregion and a country. The suggested formulation puts organizations into very different situation depending on the location.	Modification: (remove red text) All sites are located in the same ecoregion <b>and country</b> or continent.
9.1.3. b)	T	In order to get a real benefit of the shared credit accounts e.g in Europe the location of the sites cannot be restricted to an ecoregion and a country. The suggested formulation puts organizations into very different situation depending on the location.	Modification: (remove red text) All sites are located in the same ecoregion <b>and country</b> or continent.
9.1.3. b)	T	In order to get a real benefit of the shared credit accounts e.g in Europe the location of the sites cannot be restricted to an ecoregion and a country. The suggested formulation puts organizations into very different situation depending on the location.	Modification: (remove red text) All sites are located in the same ecoregion <b>and country</b> or continent.
9.1.3. b)	T	Country is too restrictive in the case of Europe, which contains several biogeographical regions. Is the location of the site relevant or rather the wood procurement area? The ecoregion requirement is understandable from a wood sourcing perspective, but not relevant for further processing.	9.1.3 b) All sites are located in the same ecoregion (e.g. Canadian boreal forests, Amazon river) or continent (e.g. Europe) or the output credit is interchangeable according to clauses 9.3.2, 9.3.3 and 9.3.4 a) of this standard;
9.1.3. b)	T	Country is too restrictive in the case of Europe, which contains several biogeographical regions. Is the location of the site relevant or rather the wood procurement area? The ecoregion requirement is understandable from a wood sourcing perspective, but not relevant for further processing.	9.1.3 b) All sites are located in the same ecoregion (e.g. Canadian boreal forests, Amazon river) or continent (e.g. Europe) or the output credit is interchangeable according to clauses 9.3.2, 9.3.3 and 9.3.4 a) of this standard;
9.1.3. b)	T	Country is too restrictive in the case of Europe, which contains several biogeographical regions. Is the location of the site relevant or rather the wood procurement area? The ecoregion requirement is understandable from a wood sourcing perspective, but not relevant for further processing.	9.1.3 b) All sites are located in the same ecoregion (e.g. Canadian boreal forests, Amazon river) or continent (e.g. Europe) or the output credit is interchangeable according to clauses 9.3.2, 9.3.3 and 9.3.4 a) of this standard;
9.1.3. c)	T, E	The contribution of a single site as part of the multi-site system is too demanding. The important issue is that each site contributes credits each year also to be used by its own site.	Modification: (remove red text) ...shall contribute <b>at least 10 % of the</b> input credits used also by...
9.1.3. c)	T, E	UPM considers the contribution requirement for a single site as too demanding. Of course it is essential that each site using the output credits contributes to the input credits on regular basis, but there should be no site-based quantity limitations.	Modification: (remove red text) ...shall contribute <b>at least 10 % of the</b> input credits used also by...
9.1.3. c)	T, E	UPM considers the contribution requirement for a single site as too demanding. Of course it is essential that each site using the output credits contributes to the input credits on regular basis, but there should be no site-based quantity limitations.	Modification: (remove red text) ...shall contribute <b>at least 10 % of the</b> input credits used also by...
9.1.3. c)	T, E	UPM considers the contribution requirement for a single site as too demanding. Of course it is essential that each site using the output credits contributes to the input credits on regular basis, but there should be no site-based quantity limitations.	Modification: (remove red text) ...shall contribute <b>at least 10 % of the</b> input credits used also by...
9.1.3.b	T	As it is stated, it narrows quite strongly the possibility of a shared credit account with operations in Europe, as an example.	All sites located in a group of countries with common characteristics as sharing the same type of geographical and environmental traits, political and/or monetary system (e.g. European Union).
9.1.3.b	T	It is not rational (or possible to understand why) to have this condition that the sites shall be located in the same country. For instance paper mills located in different countries may purchase pulp with origin from the same country or vice versa. With this condition the benefits to have shared credit accounts will very unfairly only be available to some companies but not to others.	Delete clause 9.1.3 b

9.1.3.b	T	Country is too restrictive in the case of Europe, which contains several biogeographical regions. Is the location of the site relevant or rather the wood procurement area? The ecoregion requirement is understandable from a wood sourcing perspective, but not relevant for further processing	All sites are located in the same ecoregion (e.g. Canadian boreal forests, Amazon river) or continent (e.g. Europe) or country or the output credit is interchangeable according to clauses 9.3.2, 9.3.3 and 9.3.4 a) of this standard;
9.1.3.b	G	What is the point of this clause? If a multi-national company operates the same management system across the group and buys raw material from countries around the world, what possible difference does it make what eco-region they are in? Is the EU a single eco-region?	Delete
9.1.3.b	T	As it is stated, it narrows quite strongly the possibility of a shared credit account with operations in Europe, as an example.	All sites located in a group of countries with common characteristics as sharing the same type of geographical and environmental traits, political and/or monetary system (e.g. European Union).
9.1.3.b	T	Country is too restrictive in the case of Europe, which contains several biogeographical regions. Is the location of the site relevant or rather the wood procurement area? The ecoregion requirement is understandable from a wood sourcing perspective, but not relevant for further processing	All sites are located in the same ecoregion (e.g. Canadian boreal forests, Amazon river) or continent (e.g. Europe) or the output credit is interchangeable according to clauses 9.3.2, 9.3.3 and 9.3.4 a) of this standard;
9.1.3.b		9.1.3 b) which definition of ecoregion shall be used?	
9.1.3.b	T	Country is too restrictive in the case of Europe, which contains several biogeographical regions. Is the location of the site relevant or rather the wood procurement area?	If it is necessary to restrict this beyond a common ownership structure then it should be done at a geographical level –for example Europe to simplify the process.
9.1.3.b	T, E	In order to get a real benefit of the shared credit accounts e.g in Europe the location of the sites cannot be restricted to an ecoregion and a country. The suggested formulation puts organizations into very different situation depending on the location.	Modification: (remove red text) All sites are located in the same ecoregion <b>and country</b> or continent.
9.1.3.b	T	In Europe the limitation on only one country is unpractical and contradicts the reality of many companies.	Skip "and within one country"
9.1.3.b	G	As it is stated, it narrows quite strongly the possibility of a shared credit account with operations in Europe, as an example.	All sites located in a group of countries with common characteristics as sharing the same type of geographical and environmental traits, political and/or monetary system (e.g. European Union).
9.1.3.b	E	"All sites are located in the same ecoregion and country." The draft Standard does not define Ecoregion. Does FSC intend to use WWF Global Terrestrial Ecoregions?	Define ecoregion. I.e. WWF Global Terrestrial Ecoregions
9.1.3.b	E	For companies who operate in both US and Canada, sales offices may not be located where FSC products are produced, however both manufacturing sites and sales sites are listed on the same multi-site certificate. The manufacturing process can occur in the same general area i.e. ecoregion or country, but sales offices should be excluded from the criteria for determining the shared sites.	Only manufacturing sites are considered when determining pooled sites. Sales sites are excluded.
9.1.3.b	G	The EUTR-region should be accepted as low risk region for shared credits exchange. Each site participating shall contribute at least 5%. When we have more experiences this value could be adapted to the identified needs.	
9.1.3.b)	T	Definition of "same ecoregion" is undefined and places unnecessary constraints on manufacturing flexibility for eligibility in the shared	Eliminate ecoregion requirement.

		credit account	
9.1.3.b)	T	Most of CHs are not familiar with concept of ecoregion. Also, manufactures' sites are sometimes located outside of the ecoregions where the materials come from. Therefore using ecoregion as geographical scope is not appropriate.	More widely used geographical boarder such as countries, states, and/or districts are to be replaced with ecoregion.
9.1.3.c	T	The inclusion of the possibility to cross-credits on the CoC standard creates an opportunity to generate a wide range of positive direct and indirect impacts that deserve to be identified: 1. Economic benefits: - Optimization of the logistics and reduction of transportation costs, with transportation of raw-materials and products. Multi-site certified companies do perform sub-optimal raw material transport operations. In reality, in order to fulfil customer demand for certified products, normal supply stream has to be handled, increasing in a substantial manner the average kilometre per unit of product, particularly in areas where procurement for certified raw material is more difficult (as, for instance, in regions with highly fragmented ownership). This situation, from one end, leads to a loss of competitiveness while consuming considerable financial resources that could be made available in capacity building initiatives to increase the area under certified forest management. - Not being able to cross credits and optimize logistics contributes to put at risk the efforts to encourage micro and small landowners towards FSC certification, especially in cases where and in situations when, competitiveness of manufacturing companies is under global market pressure. 2. Environmental benefits: - Reduction of the carbon footprint (less emissions of fossil carbon) due to elimination of unnecessary wood and final product "travelling": efforts made to reduce such unnecessary transportations will reduce CO2 emissions and the global environmental footprint of forest products, production and manufacturing. 3. Social benefits: - Increased health & safety is expected from reduced transportation of materials due to lower accident risk. - Road conservation and general safety conditions are, as widely recognized, inversely relate with traffic intensity therefore effort in optimal raw material flow is an important aspect for sustainable operations. 4. Benefits for the FSC system: - The credits sharing system leads to an optimization and best use of available credits (sometimes credits are wasted in a site because of the logistics needs for optimization) and increased control of credits. - It should be emphasized that credits shared within such a system always involve certified wood or other forest products, thus having no negative impact on the credibility of the FSC system. On the contrary, it brings all the added benefits explained above. - Reduction of transportation costs could generate additional financial resources for the promotion of responsible forest management in the ground, particularly where it is most needed, as for example, in areas managed by micro and small landowners	Delete.
9.1.3.c	T	A 10% contribution of every single site to a multisite is not feasible, especially in areas with low FSC coverage. Wording in the clause and in the note should be consistent	Each participating site shall contribute at least 10% of the input credits used by its own site in a 12 month period. It may be difficult for all sites in certain regions to meet the 10% requirement, where this is the case it is proposed that the site should justify this to the CB and be allowed to contribute an agreed minimum percentage. This contribution can be checked each year by the CB and a new amount agreed as appropriate until the 10% is reached.

9.1.3.c	T	<p>The inclusion of the possibility to cross-credits on the CoC standard creates an opportunity to generate a wide range of positive direct and indirect impacts that deserve to be identified: 1. Economic benefits: - Optimization of the logistics and reduction of transportation costs, with transportation of raw-materials and products. Multi-site certified companies do perform sub-optimal raw material transport operations. In reality, in order to fulfil customer demand for certified products, normal supply stream has to be handled, increasing in a substantial manner the average kilometre per unit of product, particularly in areas where procurement for certified raw material is more difficult (as, for instance, in regions with highly fragmented ownership). This situation, from one end, leads to a loss of competitiveness while consuming considerable financial resources that could be made available in capacity building initiatives to increase the area under certified forest management.- Not being able to cross credits and optimize logistics contributes to put at risk the efforts to encourage micro and small landowners towards FSC certification, especially in cases where and in situations when, competitiveness of manufacturing companies is under global market pressure. 2. Environmental benefits: - Reduction of the carbon footprint (less emissions of fossil carbon) due to elimination of unnecessary wood and final product “travelling”: efforts made to reduce such unnecessary transportations will reduce CO2 emissions and the global environmental footprint of forest products, production and manufacturing. 3. Social benefits: - Increased health &amp; safety is expected from reduced transportation of materials due to lower accident risk.- Road conservation and general safety conditions are, as widely recognized, inversely relate with traffic intensity therefore effort in optimal raw material flow is an important aspect for sustainable operations. 4. Benefits for the FSC system: - The credits sharing system leads to an optimization and best use of available credits (sometimes credits are wasted in a site because of the logistics needs for optimization) and increased control of credits. - It should be emphasized that credits shared within such a system always involve certified wood or other forest products, thus having no negative impact on the credibility of the FSC system. On the contrary, it brings all the added benefits explained above. - Reduction of transportation costs could generate additional financial resources for the promotion of responsible forest management in the ground, particularly where it is most needed, as for example, in areas managed by micro and small landowners</p>	Delete.
9.1.3.c	T	<p>A 10% contribution of every single site to a multisite is not feasible, especially in areas with low FSC coverage. Wording in the clause and in the note should be consistent</p>	<p>Each participating site shall contribute at least 10% of the input credits used by its own site in a 12 month period.</p> <p>It may be difficult for all sites in certain regions to meet the 10% requirement, where this is the case it is proposed that the site should justify this to the CB and be allowed to contribute an agreed minimum percentage. This contribution can be checked each year by the CB and a new amount agreed as appropriate until the 10% is reached.</p>
9.1.3.c	T	<p>A 10% contribution of every single site to a multisite is not feasible, especially in areas with low FSC coverage. Wording in the clause and in the note should be consistent</p>	<p>Each site participating in a shared credit account shall contribute at least 5% of the input credits used by its own site in a 12 month period.</p>
9.1.3.c	T, E	<p>The contribution of a single site as part of the multi-site system is too demanding. The important issue is that each site contributes credits each year also to be used by its own site.</p>	<p>Modification: (remove red text) ...shall contribute <b>at least 10 % of the</b> input credits used also by...</p>

9.1.3.c	G	We support the provision that each participating site contribute at least 10% of the credits they use. This is a good compromise to the challenges posed for each site to contribute 5-10% of their total inputs, and ensures each site is sourcing some FSC input.	No change required.
9.1.3.c	T	Sites should be able to participate even if zero inputs credits are used at that site. This would allow for efficiencies to be created. A company could focus labelling and packaging at fewer sites. This would reduce errors as less people would be involved. Having a site able to package and label a small percentage of the claimed products is as or more expensive than a larger percentage (people are not used to the process as it does not occur often). Also companies could focus labelling and packaging at sites that are closer to customers that require FSC claims, reducing transportation and carbon footprint. There is no risk here because the CB would also audit sites that are not using input credits.	Remove 9.1.3.c
9.1.3.c)	T, E	The contribution of a single site as part of the multi-site system is too demanding. The important issue is that each site contributes credits each year also to be used by its own site.	Modification: (remove red text, add blue) ...shall contribute <b>at least 10 % of the</b> input credits used <b>also</b> by...
9.1.3.c)	T, E	The contribution of a single site as part of the multi-site system is too demanding. The important issue is that each site contributes credits each year also to be used by its own site.	Modification: (remove red text, add blue) ...shall contribute <b>at least 10 % of the</b> input credits used <b>also</b> by...
9.1.3.c)	T, E	The contribution of a single site as part of the multi-site system is too demanding. The important issue is that each site contributes credits each year also to be used by its own site.	Modification: (remove red text, add blue) ...shall contribute <b>at least 10 % of the</b> input credits used <b>also</b> by...
9.1.3b	E	<p>“All sites are located in the same ecoregion and country.” We support sites being located in the same country. However, the provision that the sites must also be within the same ecoregion is problematic and greatly reduces the ability to share credits and increase supply of FSC labelled product. For example:</p> <ol style="list-style-type: none"> <li>1) A site may source from 2 or 3 different ecoregions, but because of the single ecoregion requirement, could not share their credits with sites within those other regions.</li> <li>2) Sites are located in areas that are not within a defined WWF ecoregion. The draft language would prohibit these sites from sharing credits.</li> <li>3) In the US, a large portion of FSC input is sourced globally (FSC Market Pulp) or is recycled material. Ecoregion has no context in these situations.</li> </ol> <p>Additionally, the pilot study required sites within same ecoregion OR country, and the report did not indicate there were concerns with this. There is not a compelling reason for modifying the language in the draft Standard to require ecoregion AND country.</p>	<p>“All sites are located in the same ecoregion OR country.”</p> <p>Or</p> <p>“All sites are located in the same country.”</p>
9.1.3b	T	This sub-clause appears to relate to site location, and can be deleted as not necessary.	Delete; sources may come from multiple locations and regions, as commonly with paper pulp.
9.1.3b	T	Some value chains are using a limited supplier structure and therefore use wood / paper fiber from only one eco region in production sites located in different eco regions. As the sourcing of wood / fiber is critical and not where the final end product production takes place the wording should be adapted as proposed	...All sites are located in or supplied with raw material from the same ecoregion
9.2.	T	Reference to ‘claim period for each credit account’ is confusing, as the claim out of a credit account is always the same. If the intent of this requirement is to fix a minimum frequency to update input and output records for a credit account, this should be rephrased.	Revise wording of clause 9.2.1. to clarify what is actually the requirement.
9.2.0	T	I don’t understand how this works. Is it different from the current situation? It seems so but I can’t understand this requirement.	Clarify.

9.2.0		<p>Cross-Site Credit Sharing: Giving mills the ability to trade credits between mills will limit mills' need to buy certified logs regionally. This reduces FSC's impact in areas with lower forestry laws and regulations. This is a significant negative.</p> <p>This impact can be seen through landowner participation trends between California, Oregon, and Washington landowners. California law provides a higher forestry bar than WA and OR. Washington is a higher bar than OR. This has caused significantly more land in CA to be FSC certified than in WA and less land in Oregon certified than Washington.</p> <p>To highlight this trend, there are companies with land in Oregon and California that only certify their California land.</p> <p>Cross-site sharing of credits will retard the growth of FSC in regions like Oregon.</p> <p>We need to fix the real issue of low demand, not the symptom of expiring credits and the desire to share credits between sites.</p> <p>If we allow cross site credit sharing it should be to make FSC easy and increase market share with the long-term goal of restricting credit sharing as the FSC market becomes stronger.</p>	<p>Accept credit sharing between sites to allow increased market share and make it easier to participate and find FSC inputs. HOWEVER, include a sunset clause for cross site credit sharing for 2025.</p> <p>Signal in the strategic plan that we intend to tighten the FSC rules in the long-term once FSC matures and has higher market value.</p>
9.2.1	T	<p>Crosswalk and FSC-STD-40-004-2-1 lists maximum claim period shall be (3) three months. Draft for FSC-STD-40-004-3-0 lists (1) one month. Which is it?</p>	<p>Do not endorse this change at all. While our organization does operate on a (1) one month claim period, we are a fairly large organization having the resources to update sales and raw materials inputs on as short a period as this. Smaller operations, which might well include some of our customers might not have the resources to make such updates any more frequently than quarterly. Strongly endorse leaving the claim period at (3) three months.</p>
9.2.2	G	<p>Accounting and Maintenance of Claim-contributing Inputs: AF&amp;PA supports the recommendation that "pre-consumer" reclaimed paper counts as the full quantity as stated on the supplier invoice. "Pre-consumer" fiber should be valued equally as "post-consumer" fiber since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance. Mandates or labeling schemes that preference "post-consumer" content in products often result in distortions in the market-driven demand/supply balance by driving up prices for some usable fiber while placing an artificial barrier to the use of other equally environmentally beneficial reclaimed paper. Benefits accrue from utilizing all available sources of reclaimed paper, not by singling out a specific source as the one that "counts."</p>	
9.2.2	G	<p>The one month claim period will limit the ability to effectively use the credit account system. Keep wording of current standard 9.1.1 in place which allows for a 3 month claim period.</p>	
9.2.2	T	<p>A credit claim period of one month may be inconsistent with established business financial practices, adding another layer of administration. The three-month claim period allows companies to be flexible in this regard.</p>	<p>Keep the credit claim period at maximum of three months.</p>
9.2.2	T	<p>A maximum claim period length of one (1) month is not feasible since most products are not Fast Moving Consumer Goods.</p>	<p>The maximum claim period length shall be three (3) months</p>
9.2.2	T	<p>9.2 Specification of claim periods The claim period to create the credit account is not in a direct relation to the management of the credits. This is only a extra effort.</p>	<p>The maximum claim period length shall be three (3) month.</p>
9.2.2	T	<p>Claim Period: Maintain the (3) three month claim period.</p>	

9.2.2	E	Claim period in existing requirements and in accompanying “walk through” documents is 3 months assume that this is a typo.	Clarification as to whether it is 1 or 3 months.
9.2.2	T	This period seems too short to facilitate proper reporting.	9.2.2 The maximum claim period length shall be three (3) months.
9.2.2	T	Why mentioning a claim period length in a credit system?	
9.2.2	T, E	In the excel sheet explaining the changes provided by FSC, it is clearly said that the maximum claim period shall be three (3) months. However, in the normative text it is only one (1) month. Could you explain this reduction?	Modification: (remove red text) ... length shall be <b>one (1)</b> three (3) months
9.2.2	T	Why mentioning a claim period length in a credit system?	
9.2.2	G	There is a lot of concern that the change from 3 months to 1 month is an unnecessary change and only increases the complexity for CHs who have set up there system with a three month claim period.	Review and evaluate the necessity of changing the maximum claim period from 3 months to 1 month.
9.2.2	G	The time frame for the maximum claim period length should remain being three months. The balance does not correspond with the use of credits within the production process. The credit management makes sure that the credit balance will not turn negative. The compilation of the claim balance is only a statistical observation on a daily basis. Shortening the maximum claim period will only raise the bureaucratic overhead without any security improvement in the process.	The maximum claim period length shall be three (3) months.
9.2.2	G	The time frame for the maximum claim period length should remain being three months. The balance does not correspond with the use of credits within the production process. The credit management makes sure that the credit balance will not turn negative. The compilation of the claim balance is only a statistical observation on a daily basis. Shortening the maximum claim period will only raise the bureaucratic overhead without any security improvement in the process.	The maximum claim period length shall be three (3) months.
9.2.2	T	A maximum claim period length of one (1) month is not feasible since most products are not Fast Moving Consumer Goods.	The maximum claim period length shall be three (3) months
9.2.2	G	This change in the standards will have a negative impact on our certification. A huge cost and time allotment will be needed to account for materials on a monthly basis as opposed to quarterly. The change from a 3 to 1 month accounting record does not make sense given the sales process and feedback required within other sections of the standard. So long as credits are expired within the correct time frame it should not matter to what level an accounting claim is managed.	Due to seasonal harvesting issues a fluctuation in FSC fiber availability is a natural occurrence. A couple weeks of rain has a huge impact. The 3 month period allows for wood supply to provide a relatively even flow of certified wood to the mill. A monthly supply/demand balancing act will be much more difficult to achieve and months where no input takes place will occur. This can be a smooth input curve through allowing a 3 month claim period. Leave claim period at 3 months within new standard. Changing to a monthly claim will be costly, time consuming, and meaningless.
9.2.2	G	The time frame for the maximum claim period length should remain being three months. The balance does not correspond with the use of credits within the production process. The credit management makes sure that the credit balance will not turn negative. The compilation of the claim balance is only a statistical observation on a daily basis. Shortening the maximum claim period will only raise the bureaucratic overhead without any security improvement in the process.	The maximum claim period length shall be <b>three (3)</b> months.



9.2.2	T	This is by far my greatest concern with the new standard. We are currently on a 3 month claim period and going to a one month claim period will triple our accounting costs for zero increased value. We have a computerized administration system that tracks all inputs and outputs daily. Every three months our accountants balance our volume credit accounts using this data. All records are maintained in our system. Our CB has never found an issue with our system. Please reconsider this change or modify it to leave the option of one or three months. This is a serious concern for our company.	The maximum claim period length shall be three (3) month.
9.2.2		A one month claim period severely limits the ability of COC users to effectively utilize the credit account system. Continue to use the 3 month claim period in the current COC standard.	The maximum claim period length shall be three (3) months.
9.2.2	G	Reducing claim from 3 months to 1 month does not work for manufacturers who have complex product lines and use ERP systems to drive their manufacturing and delivery process.	Recommend staying with 3 months to account for these complex product configuration needs.
9.2.2	T	In the excel sheet explaining the changes provided by FSC, it is clearly said that the maximum claim period shall be three (3) months. However, in the normative text it is only one (1) month. Could you explain this reduction?	Modification: (remove red text) ... length shall be <b>one (1)</b> three (3) months
9.2.2	T	In the excel sheet explaining the changes provided by FSC, it is clearly said that the maximum claim period shall be three (3) months. However, in the normative text it is only one (1) month. Could you explain this reduction?	Modification: (remove red text) ... length shall be <b>one (1)</b> three (3) months
9.2.2	T	In the excel sheet explaining the changes provided by FSC, it is clearly said that the maximum claim period shall be three (3) months. However, in the normative text it is only one (1) month. Could you explain this reduction?	Modification: (remove red text) ... length shall be <b>one (1)</b> three (3) months
9.2.2	T	A maximum claim period length of one (1) month is not feasible since most products are not Fast Moving Consumer Goods.	The maximum claim period length shall be three (3) months
9.2.2	T	The claim period to create the credit account is not in a direct relation to the management of the credits. This is only a extra effort.	The maximum claim period length shall be three (3) month.
9.2.2	G	The time frame for the maximum claim period length should remain being three months. The balance does not correspond with the use of credits within the production process. The credit management makes sure that the credit balance will not turn negative. The compilation of the claim balance is only a statistical observation on a daily basis. Shortening the maximum claim period will only raise the bureaucratic overhead without any security improvement in the process.	The maximum claim period length shall be three (3) months.
9.2.2	G	We strongly oppose changing the maximum claim period length from 3 months to 1 month. This change would be a significant administrative burden from a record keeping standpoint, for no apparent reason or added benefit.	
9.2.2	G	Claim Period: A one month claim period severely limits the ability of COC users to effectively utilize the credit account system.	Continue to use the 3 month claim period in the current COC standard.
9.2.2	G	The time frame for the maximum claim period length should remain being three months. The balance does not correspond with the use of credits within the production process. The credit management makes sure that the credit balance will not turn negative. The compilation of the claim balance is only a statistical observation on a daily basis. Shortening the maximum claim period will only raise the bureaucratic overhead without any security improvement in the process.	The maximum claim period length shall be three (3) months.
9.2.2	G	Changing to a monthly claim will be costly and time consuming. Is there any rationale for this that makes the change absolutely necessary? In addition to the incremental work this change will cause, CHs will have a more difficult time maintaining an even flow of FSC input and sales. Sales projections and FSC fiber needs will have to be calculated each month instead of each quarter.	Please restore the maximum claim period to 3 months.

9.2.2	T	In the excel sheet explaining the changes provided by FSC, it is clearly said that the maximum claim period shall be three (3) months. However, in the normative text it is only one (1) month. Could you explain this reduction?	Modification: (remove red text) ... length shall be <b>one (1)</b> three (3) months
9.2.2	T	A maximum claim period length of one (1) month is not feasible since most products are not Fast Moving Consumer Goods.	The maximum claim period length shall be three (3) months
9.2.2	G	The maximum claim period length shall be one (1) month. This revised requirement will require additional monitoring and follow up on a short term basis to ensure that FSC credits that could be recorded would be recorded and used within the required timeframes. Organizations have different accounting periods ( calendar month or based on 4, 4 & 5 week schedule ) which could cause difficulties in recording credits on a timely basis. This change does not add any additional value in ensuring that credits earned are properly recorded.	Maintain standard at 3 months as the current standard allows.
9.2.2	T	In the excel sheet explaining the changes provided by FSC, it is clearly said that the maximum claim period shall be three (3) months. However, in the normative text it is only one (1) month. Could you explain this reduction?	Modification:(remove red text) ... length shall be <b>one (1)</b> three (3) months
9.2.2	T	In the excel sheet explaining the changes provided by FSC, it is clearly said that the maximum claim period shall be three (3) months. However, in the normative text it is only one (1) month. Could you explain this reduction?	Modification:(remove red text) ... length shall be <b>one (1)</b> three (3) months
9.2.2	T	In the excel sheet explaining the changes provided by FSC, it is clearly said that the maximum claim period shall be three (3) months. However, in the normative text it is only one (1) month. Could you explain this reduction?	Modification:(remove red text) ... length shall be <b>one (1)</b> three (3) months
9.2.2	G	CHs who are currently using a 3 month period should be allowed to continue to do so. CH should have the ability to define a claim period up to 3 months in length. A 3 month period may be more efficient, and therefore reduce cost.	No change needed
9.2.2	T	The claim period of one (1) month is too short and means an additional effort and will bring no additional results.	The maximum period length shall be three(3) months.
9.2.2		Claim Period: A one month claim period severely limits the ability of COC users to effectively utilize the credit account system.	Continue to use the 3 month claim period in the current COC standard.
9.2.2	T	A maximum claim period length of one (1) month is not feasible since most products are not Fast Moving Consumer Goods.	The maximum claim period length shall be three (3) months
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9.2.2	G	The time frame for the maximum claim period length should remain being three months. The balance does not correspond with the use of credits within the production process. The credit management makes sure that the credit balance will not turn negative. The compilation of the claim balance is only a statistical observation on a daily basis. Shortening the maximum claim period will only raise the bureaucratic overhead without any security improvement in the process.	The maximum claim period length shall be three (3) months.
9.2.2	G	The time frame for the maximum claim period length should remain being three months. The balance does not correspond with the use of credits within the production process. The credit management makes sure that the credit balance will not turn negative. The compilation of the claim balance is only a statistical observation on a daily basis. Shortening the maximum claim period will only raise the bureaucratic overhead without any security improvement in the process.	The maximum claim period length shall be three (3) months.

9.2.2	T		Clarify claim Period of 1 month. Does this require adding and subtracting credits within one month of the transaction?
9.2.2		Maximum period length of 1 month is not practical as timespan for order, invoicing, production and delivery can be longer than one month. This would increase bureaucratic efforts without adding benefit compared to current set up.	Stay with current requirement of 3 month
9.2.2	G	The time frame for the maximum claim period length should remain being three months. The balance does not correspond with the use of credits within the production process. The credit management makes sure that the credit balance will not turn negative. The compilation of the claim balance is only a statistical observation on a daily basis. Shortening the maximum claim period will only raise the bureaucratic overhead without any security improvement in the process.	The maximum claim period length shall be three (3) months.
9.2.2.	T	The time frame to calculate FSC claims was reduced to one month. This is perceived as a strong limitation. Because a reduction of this time frame does not lead to further information, however would lead to high bureaucratic costs	The maximum time frame remains (3) months to calculate claims.
9.2.2.	T	The claim period of 1 month is not flexible enough. For some companies with irregular supplies or with limited labour capacity it would have been better to keep extended claim-period up to 3 months.	The maximum claim period length shall be three (3) months
9.3.0		The quality of a product does not interfere positively or negatively in its traceability, and therefore is not the scope of the CoC standard. The quality of an input is already addressed through the conversion factor, which considers the input and output of the organization's production system. And the standard already provides mechanisms to ensure coherence to this conversion factor. The FSC vision never was to ensure the quality of their products, but to guarantee that a product came from a responsible Forest Management and has an origin guarantee through the tracing of the chain of custody.	Clarify which aspect of quality the requirement is trying to address. Also, is necessary reply these aims in Chain of Custody Evaluation (FSC-STD-20-011), leading how CBs are going to audit these indicators
9.3.0	T	In general, this section is good and is much improved from past drafts of the standard. In sections 9.3.5 and 9.3.6, it addresses the concerns about "upgrading" or "substitution" by manufacturers using the credit system that were discussed within the Working Group. Bravo! However, there is one area of concern, that it does not address, and this is possible "upgrading" or "substitution" by traders of unfinished products who use of the credit system, e.g. traders of logs and hardwood lumber (and softwood lumber? Again, the distinction between "finished" and "unfinished" products is not totally clear).	Since it only applies to manufacturers, amend section 9.3.6 as follows: "When the same input material yields a range of output grades (e.g. logs yield sawn timber in a variety of grades), the manufacturing organization shall not sell more..."  Then add a new section 9.3.7 as follows: "Organizations that trade unfinished products (e.g. logs, hardwood lumber) shall not systematically transfer credits derived from low grade inputs to high grade outputs."
9.3.0	T	I agree with comments of Jason Grant.	I agree with suggestion of Jason Grant, for amendment of 9.3.6 and addition of 9.3.7.

9.3.0		The quality of a product does not interfere positively or negatively in its traceability, and therefore is not the scope of the CoC standard. The quality of an input is already addressed through the conversion factor, which considers the input and output of the organization's production system. And the standard already provides mechanisms to ensure coherence to this conversion factor. The FSC vision never was to ensure the quality of their products, but to guarantee that a product came from a responsible Forest Management and has an origin guarantee through the tracing of the chain of custody.	Clarify which aspect of quality the requirement is trying to address. Also, is necessary reply these aims in Chain of Custody Evaluation (FSC-STD-20-011), leading how CBs are going to audit these indicators
9.3.1	G	We support the use of a cross site credit system. This could help with some of the issues mentioned in our comments of 9.3.5. This will increase the volume of FSC credits, by moving them to facilities that have the highest demand, but may be lacking credits.	
9.3.1	G	We support the use of a cross site credit system. This could help with some of the issues mentioned in our comments of 9.3.5. This will increase the volume of FSC credits, by moving them to facilities that have the highest demand, but may be lacking credits.	
9.3.1	G	We support the use of a cross site credit system. This could help with some of the issues mentioned in our comments of 9.3.5. This will increase the volume of FSC credits, by moving them to facilities that have the highest demand, but may be lacking credits.	
9.3.1	T	9.3.1 NOTE pls clarify that you are referring to 9.3.1 b)	Clarify.
9.3.1	E	9.3.1. Note Clarification and simplification of language	Rewrite - Use of output based accounts requires application of a conversion factor(s), before credits are added to the credit account.
9.3.1	E	We do not understand the functional meanings of in-put and output based credit accounts.	Include definitions on in-put and output based credit accounts.
9.3.1	G	The proposed change here is in general supportable as it allows organizations the flexibility to decide how they want to manage their credit accounts. However, there is some confusion about what exactly FSC means by input-based and out-based credit accounts, and therefore it may be helpful to include a definition in the standard to help clarify.	Discuss the necessity of including a definition.
9.3.1	G	We support the use of a cross site credit system. This could help with some of the issues mentioned in our comments of 9.3.5. This will increase the volume of FSC credits, by moving them to facilities that have the highest demand, but may be lacking credits.	
9.3.1	G	We support the use of a cross site credit system. This could help with some of the issues mentioned in our comments of 9.3.5. This will increase the volume of FSC credits, by moving them to facilities that have the highest demand, but may be lacking credits.	
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9.3.1	G	We support the use of a cross site credit system. This could help with some of the issues mentioned in our comments of 9.3.5. This will increase the volume of FSC credits, by moving them to facilities that have the highest demand, but may be lacking credits.	
9.3.1	g	For paper mills we have several conversions, Green Wood Tons to Pulp tons to Paper Tons. Most leave credit account in Pulp Tons which is not allowed?	Clarify for paper companies
9.3.1	G	This whole section is not very clear.	

9.3.1	T	<p>I support restrictions to the credit system in the form of changing credit accounts from outputs to inputs. Companies with multiple inputs of different value should not be allowed to run an outputs account and build credits based on the lower value input.</p> <p>I believe there are loopholes that are allowing companies to act against the spirit of the standard. The companies that take advantage of these loopholes gain significant advantage and cost savings when compared to companies following the spirit of the standard.</p> <p>The “tightening” of the credit system should occur in 4-8 years. I believe the FSC system has not delivered enough value to businesses to become stricter at this point without risking significant attrition. The FSC needs more time to provide brand value and added product value. Value is being addressed via marketing and communications work. It will take time to mature.</p> <p>To avoid attrition we must delay the tightening of the credit system. Approve changes now but include a delayed start time. A delay of 4-8 years is critical to allow FSC value to mature prior to tightening.</p>	Credit system account management changes detailed in my rationale section should be included and approved BUT their implementation should be delayed until after 2020.
9.3.1	G	<p>Allowing a company to choose whether they want an input credit account or output based credit account leaves room for companies to find loop-holes.</p> <p>However, the loop-holes I have seen as a senior auditor at the Rainforest Alliance and group manager for Sustainable Northwest have been addressed with separate language. Good work. As long as 9.3.2, 9.3.3, and 9.3.6 remain in the V3 standard I support this input vs output account flexibility.</p>	Keep language.
9.3.1 & 9.4.1	T	Does the NOTE in 9.3.1 and 9.4.2 only apply to organizations that use output-based accounts?	This must be clear in the text
9.3.1 - 9.3.6		I understand the intent of these additional Indicators to clarify the role and parameters of credit accounts. However, too many restrictions and specifications have been proposed that do more to confuse this method rather than clarify.	This section should be simplified and less restrictive in order to promote the ability to sell FSC certified products.
9.3.1 & 9.4.1	T	Does the NOTE in 9.3.1 and 9.4.2 only apply to organizations that use output-based accounts	This should be clear in the text
9.3.1 Note	E,T	A bit unclear. Readers do not seem to understand this note.	This should be clear in the text
9.3.1 to 9.3.6		<p>The proposed change here is in general supportable as it allows organizations the flexibility to decide how they want to manage their credit accounts. However, there is some confusion about what exactly FSC means by input-based and out-based credit accounts, and therefore it may be helpful to include a definition in the standard to help clarify.</p> <p>9.3.3 – is confusing. We are not sure how low quality/price input material can be exchange with high quality/price materials.</p>	Use current section 9 of FSC-STD-40-004 to establish credit accounts requirements. These requirements are already simplified.
9.3.1. and 9.4.2.	E	The NOTE in 9.3.1. and the requirement of the 9.4.2 are identical.	To remove the NOTE in 9.3.1 or to remove the indicator 9.4.2
9.3.2	G	I do not understand the requirement!	The requirement should be re-phrased or a note with an example should be added!
9.3.2	G	<p>9.3.2 – 9.3.6</p> <p>We support 9.3.4</p> <p>We do not support the other factors. They limit solid wood which would limit by-products into the paper industry. This will hampers the demand for solid wood components which thereby does not broaden the availability of sustainable sources for the paper industry.</p>	
9.3.2	G	<p>9.3.2 + 9.3.3</p> <p>This regulation is to decline. A rating regarding quality and price by raw material is a subjective and in case of price a temporally view.</p> <p>This requirement weakens the stepwise approach of the FSC, after</p>	

		which components form controlled sources (CW) can be used in products.	
9.3.2	T	Remove reference to appearance.	Strike the phrase: "or"
9.3.2		<p>9.3.2 - 9.3.6 – Clarification of the intent of the credit system  This will most likely make it through in some form. It will require sawmills to maintain credit accounts by the grades of lumber typically recovered from a run of logs. I have talked to several large supplying mills and doing this takes away nearly all incentive to remain certified and adds a considerable amount of work. This is a significant risk to us on the supply side. On a broader scale, it is a big risk to the system and their efforts to penetrate the solid wood market. When considered along with LEEDs acceptance of SFI, hardwood solid wood could exit the system. This will remove a critical demand driver to fund certification of private lands.</p> <p>There is also a provision that has an exception for the hardwood and softwood pulp differentiation in paper. It is important that this remain do to the variation in grades, the use of mill broke, etc. There is no basis for differentiation so there should not be any. If we can only certify either hardwood or softwood timber stands due to external demand drivers, we need to be able to use all of the available credit material from the land base. Without this provision, certified paper would be limited to the amount of hardwood or softwood credits available for that particular sheet.</p>	
9.3.2	T	<p>9.3.5 &amp; 9.3.6</p> <p>In many cases in North America, the tightening of these requirements for credit accounting seems to go against what some feel to be the original intent of the credit system and why it was created in the first place. There has been a lot of debate about how credit accounts are established and the fungibility of these credits. It is important to understand that the tightening of requirements here and in this fashion may result in major attrition of certificate holders from the solid wood and assembled wood product sectors in North America.</p>	It's clear that motion 46 from the GA in 2011, asking FSC to clarify the intent of the credit system was needed, but FSC needs to be aware of and seriously consider the repercussions of the current proposed requirements and how they might impact the certificate holder base and the availability of FSC certified products.
9.3.2	E	Any requirement must be stated clearly without the need of different wording!	
9.3.2	T	<p>9.3.2 and 9.3.3</p> <p>These requirements aren't needed if the product groups are well defined.</p>	Delete 9.3.2 and 9.3.3.
9.3.2	E	Any requirement must be stated clearly without the need of different wording!	
9.3.2	T	<p>9.3.2 and 9.3.3</p> <p>These requirements aren't needed if the product groups are well defined.</p>	Delete 9.3.2 and 9.3.3.

9.3.2	G	<p>The proposal here to clarify the intent of the credit system will likely impact industry sectors in various ways. However, the clarifications appear to mostly impact the solid wood and assembled wood product sectors, and additionally these certificate holders may be impacted non-uniformly depending on how they originally set-up their COC systems and management of credit accounts.</p> <p>In many cases in North America, the tightening of these requirements for credit accounting seems to go against what some feel to be the original intent of the credit system and why it was created in the first place. There has been a lot of debate about how credit accounts are established and the fungibility of these credits. We have come to understand that the tightening of requirements here and in this fashion may result in major attrition of certificate holders from the solid wood and assembled wood product sectors in North America. However, there are other certificate holders that appear to already be managing their credit accounts in a manner consistent with the requirements in the revision, so these clarifications in the draft may not affect these certificate holders as drastically.</p> <p>It's clear that motion 46 from the GA in 2011, asking FSC to clarify the intent of the credit system was needed, but FSC needs to be aware of and seriously consider the repercussions of the current proposed requirements and how they might impact the certificate holder base and the availability of FSC certified products.</p>	
9.3.2	G	<p>This point should be cancelled as the combination of mix products concerning quantity and quality of the incoming wood types has a direct impact on the characteristics and the value of the product. Quality and quantity of the incoming wood is therefore not randomly exchangeable without a direct influence on the product. The proposed mechanism is therefor not applicable.</p>	Cancellation
9.3.2	G	<p>This point should be cancelled as the combination of mix products concerning quantity and quality of the incoming wood types has a direct impact on the characteristics and the value of the product. Quality and quantity of the incoming wood is therefore not randomly exchangeable without a direct influence on the product. The proposed mechanism is therefor not applicable.</p>	Cancellation
9.3.2	G	<p>The quality of input concept is not clear enough and too much linked to money related value of the input material. The same wood species can be appear as round wood, woodchips and virgin pulp with different prices. Furthermore the wood species can be saw mill residue, wood pulp, logs, Forest management residue like brunches, treetops, stumps and would be evaluated as different quality of input.</p> <p>=&gt;Try to find a more environmental related definition of quality of input like the Forest type ( ecoregion).</p>	
9.3.2	G	<p>This point should be cancelled as the combination of mix products concerning quantity and quality of the incoming wood types has a direct impact on the characteristics and the value of the product. Quality and quantity of the incoming wood is therefore not randomly exchangeable without a direct influence on the product. The proposed mechanism is therefor not applicable.</p>	Cancellation
9.3.2	G	<p>Definition of quality should be more carefully discussed and established in order to avoid misunderstanding, because concept of "quality" sometimes depends on cultural background.</p> <p>For example, in Japan, manufacturing sectors tend to have finer quality standard than other countries in order to response Japanese consumer requests for high quality. Sometimes, directly using quality definitions of such companies makes unnecessary barrier at applying credit system.</p>	N/A

9.3.2	T	The intention of this new definition for input material is clear. But: On the one hand it still leaves room for interpretation and on the other hand it gives very close restrictions. Material which is "exchangeable for manufacturing purposes without affecting the output quality" would limit the credit account to single products or recipes, which cannot be the intention.	Re-phrase the definition about input material for credit accounts. Is 9.3.2 necessary, isn't 9.3.3 enough?
9.3.2		Quality is subjective and proposed definition leaves too much room for interpretation to the auditor. Important to ensure credits are maintained as virgin to virgin fiber, recycled to recycled, etc.	This should be specified within "quality" definitions.
9.3.2	G	This point should be cancelled as the combination of mix products concerning quantity and quality of the incoming wood types has a direct impact on the characteristics and the value of the product. Quality and quantity of the incoming wood is therefore not randomly exchangeable without a direct influence on the product. The proposed mechanism is therefore not applicable.	Cancellation
9.3.2	G	This point should be cancelled as the combination of mix products concerning quantity and quality of the incoming wood types has a direct impact on the characteristics and the value of the product. Quality and quantity of the incoming wood is therefore not randomly exchangeable without a direct influence on the product. The proposed mechanism is therefor not applicable.	Cancellation
9.3.2		This point should be cancelled as the combination of mix products concerning quantity and quality of the incoming wood types has a direct impact on the characteristics and the value of the product. Quality and quantity of the incoming wood is therefore not randomly exchangeable without a direct influence on the product. The proposed mechanism is therefore not applicable.	Cancellation
9.3.2	E	Duplication of requirements.	Delete 2nd sentence - 9.3.2 A credit account shall have inputs of the same quality or shall be exchangeable for manufacturing purposes without affecting the output quality of the product. <b>In other words, substitution of one input material and/or wood species by another shall not affect the value, function, and/or physical properties/appearance. of the output product.</b> (remove red text)
9.3.2 & 9.3.3	G	Must be cancelled. Formulations are company secrets and they will never be published This point should be cancelled as the combination of mix products concerning quantity and quality of the incoming wood types has a direct impact on the characteristics and the value of the product. Quality and quantity of the incoming wood is therefore not randomly exchangeable without a direct influence on the product. The proposed mechanism is therefor not applicable.	Cancellation
9.3.2 + 9.3.3	G	This regulation is to decline. A rating regarding quality and price by raw material is a subjective and in case of price a temporally view. This requirement weakens the stepwise approach of the FSC, after which components form controlled sources (CW) can be used in products.	



9.3.2 and 3	G	<p>The language around quality and price needs clarification. Price/ economics should not be a part of the credit accounts as it is a concept that has nothing to do with the wood/ fibre. The focus should be on product types, not \$. If I have a 2x4 that is worth \$10 today and I decide to keep it in inventory for a year, the price may in fact be doubled (\$20) when I go to sell it. The actual lumber is unchanged (identical material), yet the value has increased significantly.</p> <p>Also, the function of conversion factors is being missed. Example: if a company buys low grade rough lumber and remanufactures it to remove knots and defects and end up with a higher quality product (same species), they will have a higher valued product at the end, which may be a different grade. However, the species will be the same, the product will still be lumber, and the company will have lost material in the reman process and account for it with their conversion/ recovery factor. This is how the existing system works and should work. If the company wants to maximum their certified input, they will work to minimize their conversion/ recovery factor.</p>	Remove references to pricing. Remove the quality requirements, or add in language to factor in conversion factors
9.3.2 and 9.3.3	E/T	The terms quality and price of product are very subjective and open to interpretation. Too much option for different interpretation by CBs also, what is the concern addressed here? I understood the major concern was associated with mixing species of different value points? Why not just say credit accounts by species? Or by groups of species for multi-species products with requirement that withdrawn credits must be proportionate to the amount of credits input by species (what I think 9.3.6 is trying to get at).	This will be difficult to audit consistently. How does an auditor determine how much difference in price or quality is a non-conformance in this case? Is there some kind of formula? Otherwise, it's just an auditor's review and best sense of what's going on. Would rather see this re-written in a way similar to 9.3.6 which is more auditable (not selling more of a particular grade than is covered by FSC inputs). Perhaps this could be removed in favour of 9.3.6 which seems to be worded a bit better.
9.3.2, 9.3.3, 9.3.4	T	When credit accounts are used by Wood trading departments/organizations (for raw material i.e. logs) the accounts must be set up separately per input quality in a way that eliminates the risk of output replacement. I.e. FSC saw log input credits are used for Controlled Wood pulp wood output.	Add the following sentence to 9.3.3: Raw material (i.e. logs) credit accounts must be set up separately per input quality and species
9.3.2, 9.3.3, and 9.3.6	G	These are good changes. 9.3.3 and 9.3.6 closes a critical loop-hole that puts companies acting in the spirit of the FSC standard at a disadvantage.	I support these changes as is. 9.3.3 and 9.3.6 are critical
9.3.2.	E	Using expressions as "in other words" after a requirement does not seem to fit into the normal practice of standards writing. The requirement phrasing must be clear enough.	Rephrase requirement 9.3.2. or delete second part of the paragraph, starting with the expression "In other words".
9.3.3	T	The requirement is not reproducible: 9.3.3 Price and quality are on the one hand very specific and on the other hand link to a broad range of understanding. This requirements is meaning- and senseless	Delete.
9.3.3		<p>With all due respect, good luck with this one. This will be impossible to audit. Grades are very subjective and it is too easy to find work-arounds. Grades may be intentionally misrepresented to avoid tariff and other duties. Grades are a contractual agreement usually between and a buyer and a seller. Opinions between different transactions of the same material can vary. Within a veneer panel or flitch there can be more than a single grade. Who is going to decide on 'quality of material'?</p> <p>This strikes us as punitive in comparison with paper and composites. Really, FSC needs to get over this and stay focused on forestry and methods to incite demand for FSC goods. Getting into the weeds here just takes everyone out of the FSC system (in solid wood.) It will give us an excuse to figure some other system out that serves us here</p>	Remove 9.3.3 Go to a strict cubic meter in, cubic meter out regime with no attribution to product value to accelerate demand for FSC logs. Get back to the original inspiration of FSC MIX which fundamentally changed the level and uptake of FSC certified forestry.

		in the U.S. as we export little.	
9.3.3	T	This will be almost impossible to audit, very subjective and too easy to find work-arounds. Who is going to decide on 'quality of material'?	Remove 9.3.3
9.3.3		9.3.3: a definition low quality/price vs. high quality/price is not given. Is 10% difference acceptable? Or 20% ? or 50%?	
9.3.3	G	9.3.3 and 9.3.5 We strongly support the inclusion of these criteria as they close an important loophole caused by misinterpretation of the existing CoC standard.	
9.3.3	T	The requirement is not reproducible: "The organization shall not establish credit account(s) such that credits from low quality/ price input materials or products are exchanged with high quality/ price materials or products." Price and quality are on the one hand very specific and on the other hand link to a broad range of understanding. This requirements is meaning- and senseless	Delete.
9.3.3	T	How is this rule going to be enforced, I don't see dollars or cost added to any of the FSC tracking documents. Is this added solely to be pursued on a complaint basis? If not how would an auditor find these types of issues during a field audit?	
9.3.3	G	Same comments like at 9.3.2 better definition of quality of input is needed.	
9.3.3	T	The requirement is not reproducible: "The organization shall not establish credit account(s) such that credits from low quality/ price input materials or products are exchanged with high quality/ price materials or products." Price and quality are on the one hand very specific and on the other hand link to a broad range of understanding. This requirements is meaning- and senseless	Delete.
9.3.3	T	The requirement is not reproducible: "The organization shall not establish credit account(s) such that credits from low quality/ price input materials or products are exchanged with high quality/ price materials or products." Price and quality are on the one hand very specific and on the other hand link to a broad range of understanding. This requirements is meaning- and senseless	Delete.
9.3.3		Is there a threshold for high/low quality?	
9.3.3	T	The requirement is not reproducible: "The organization shall not establish credit account(s) such that credits from low quality/ price input materials or products are exchanged with high quality/ price materials or products." Price and quality are on the one hand very specific and on the other hand link to a broad range of understanding. This requirements is meaning- and senseless	Delete

9.3.3	T	The requirement is not reproducible: “The organization shall not establish credit account(s) such that credits from low quality/ price input materials or products are exchanged with high quality/ price materials or products.” Price and quality are on the one hand very specific and on the other hand link to a broad range of understanding. This requirements is meaning- and senseless	Delete
9.3.3	T	The requirement is not reproducible: “The organization shall not establish credit account(s) such that credits from low quality/ price input materials or products are exchanged with high quality/ price materials or products.” Price and quality are on the one hand very specific and on the other hand link to a broad range of understanding. This requirements is meaning- and senseless	Delete
9.3.3	T	With all due respect, good luck with this one. This will be impossible to audit. Grades are very subjective and it is too easy to find work-arounds. Grades may be intentionally misrepresented to avoid tariff and other duties. Grades are a contractual agreement usually between and a buyer and a seller. Opinions between different transactions of the same material can vary. Within a veneer panel or flitch there can be more than a single grade. Who is going to decide on ‘quality of material’?	Remove 9.3.3
9.3.3	G	This point should be cancelled. A rating regarding quality and price by raw material is a subjective and in case of price a temporally view. This requirement weakens the stepwise approach of the FSC, after which components form controlled sources (CW) can be used in products.	Cancellation
9.3.3 / 9.3.6		This is the main reason we changed from the original PURE system to a credit system. The log separation, milling and drying the produced lumber to just be able to sell a portion of it as demanded by the market wasn’t practical. As a hardwood lumber supplier we changed to the MIX Credit system so we could quickly apply credits to the lumber that our customers wanted. As a company that supplies distributors we have customers that only want to put freight and money into our best, higher grade product. In some species this would be more than the species yields by grade and would definitely impact our sales. Hardwood sales are very competitive. For us and other hardwood manufactures as well. There isn’t a lot of revenue generated from offering FSC products, but we do it to satisfy our customers’ demands.	I would not add these changes to V-3 as they would be detrimental to FSC sales and the entire FSC program overall. Customer will only go so far before the price of an FSC item prohibits them from purchasing it. Once this happens our sales will reflect that and the customers will question the practicality of purchasing FSC products.
9.3.3 and 9.3.5	G	Strongly support the inclusion of these criteria as they close an important loophole caused by misinterpretation of the existing CoC standard.	-
9.3.3, 9.3.4, 9.3.5, 9.3.6	G	We think that these requirements in general disproportionately restrict usage of Credit system. Using Credit Control system, company will not be able to sell more certified products, that it has purchased certified raw material (what is not always the case with Percentage system using rolling average method). Also the product can be sold only with FSC Mix label therefore we do not see the risk that it could be misread by the client. Furthermore, if company is using very small component, which is always FSC Controlled Wood, using suggested changes due to separate credit accounts product will be always sold as FSC Controlled Wood (while using Percentage system it could be sold e.g. as FSC Mix 95 %). We think that main focus should be paid to correct product groups determination and control that credit is not used between different products groups.	We would suggest to withdraw sections 9.3.3, 9.3.4, 9.3.5, 9.3.6 and use current standard formulation.

9.3.3.	T	<p>It is not clear enough here what does it mean exchange of low and high quality/price materials. For example, there are tree materials of the same quality in terms of fibre characteristics, but with a different price: i.e. coniferous pulpwood, coniferous woodchips and coniferous market pulp. Practically it is much easier to consolidate all those inputs as one material called "Coniferous fibre".</p> <p>From one side there is indicator 9.3.4 which allows specifies an exception rule, but it is not linked to the 9.3.3 and would result in a non-conformity (or corrective action request) during assessment of 9.3.3.</p>	To remove the word "Price" from the indicator as soon as it is already mentioned in the definition for the word "Quality" in the Vocabulary List To add a NOTE that there is an exception case for chips and fibre products, described in the indicator 9.3.4.
9.3.3.	T	<p>This requirement will be extremely difficult to audit, and will most probably generate more problems than solutions to any potential issue.</p> <p>FSC should avoid trying to solve isolated issues with general additional requirements, which will affect all the certificate holders for CoC in an unplanned and non previously assessed way.</p>	Rephrase or delete requirement 9.3.3.
9.3.1	E,T	A bit unclear. Readers do not seem to understand this note.	Clarify this in other wording. Why can't companies have their credits in unconverted accounts (raw material accounts) Maybe remove the note!
9.3.4	G	9.3.4 / 9.3.5 The new Standard should reduce the documentary work for the companies and not raise it.	
9.3.4	G	CEPI welcomes the possibility to combine different input materials in the same credit account in the case of fibre products.	
9.3.4	G	CEPI welcomes the possibility to combine different input materials in the same credit account in the case of fibre products.	
9.3.4	G	9.3.4 / 9.3.5 With the wide variety of products (e.g. parquet or laminate floor producers) it is an huge administrative work to carry out a volume account/balance sheet for each category. The new Standard should reduce the documentary work for the companies and not raise it.	
9.3.4	G	ETS welcomes the possibility to combine different input materials in the same credit account in the case of fibre products.	
9.3.4	T	9.3.4, 9.3.5 and 9.3.6 only serve to create confusion.	Delete 9.3.4, 9.3.5 and 9.3.6.
9.3.4	G	The proposed clarifications do not appear to directly impact the chip and fiber sector as the draft does not change how manufacturers here are currently managing the establishment of their credit accounts. However, there are concerns from this sector that the clarified restrictions to the establishment of credit accounts as described above may indirectly affect the chip and fiber sector as they often include the (byproducts) as input into their systems. If the certificate holders who pass on the claims with these byproducts leave the system due to these new clarifications above, this may be a problem for the other sectors who rely on these inputs.	
9.3.4		9.3.4 stands in discrepancy to 3.2.4	
9.3.4	T	a) Strongly supported that paper and particle board industry are allowed to mix different quality of inputs in one credit account.	
9.3.4	T	b) why must a paper top layer imitating a wood species be FSC certified? Not understandable restriction for this kind of products	
9.3.4	G	UPM welcomes the possibility to combine different input materials in the same credit account in the case of fibre products.	
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9.3.4	G	UPM welcomes the possibility to combine different input materials in the same credit account in the case of fibre products.	
9.3.4	T	The issue is sufficiently covered by definitions of assembled wood and quality. Further justification:- a) Why would something being visually distinguishable be important? You can see lighter/darker chips in the chipboard core, so what if these are different species or if one is from recycled? OK, you can't tell which is which, but this still seems pointless as the definition of quality will make the distinction as and when it is appropriate (which it wouldn't necessarily be for a chipboard) b) The definition of 'assembled wood products' clearly means that melamine faced board should meet 9.3.5	This clause is unnecessary and should be removed. Or Could be advice, but as normative text it only serves to confuse.
9.3.4	E	Duplicates, and over complicates requirements set out in 9.3.3	Delete or move to an appendix/annex
9.3.4 / 9.3.5	G	With the wide variety of products (e.g. parquet or laminate floor producers) it is an huge administrative work to carry out a volume account/balance sheet for each category. The new Standard should reduce the documentary work for the companies and not raise it.	
9.3.4 / 9.3.5	G	In the situation of a wide range of products as flooring producers (solid wood and engineered) have the administration of volume accounts for each product category is a high bureaucratic effort. However one of the guiding principles of the revision was to reduce the burden of documentation and reporting.	
9.3.4 / 9.3.5	G	With the wide variety of products (e.g. parquet or laminate floor producers) it is an huge administrative work to carry out a volume account/balance sheet for each category. The new Standard should reduce the documentary work for the companies and not raise it.	
9.3.4 a)	T	"... distinguished ... with the naked eye."  In our paper making process we use several different types of pulp. So far it was quite easy to handle the balance sheet because we had one type of input (P1 according to FSC-STD-40-004a), one type of semi-finished products (e. g. in tissue mills P2.6 according to FSC-STD-40-004a) and one type of finished products (P6 according to FSC-STD-40-004a).  The sum of credits bought with the different pulps was the input of our balance sheet (conversion factors considered) and the output was the sum of certified products.  Depending on the used pulp mix the visual appearance is different in the different basepaper grades: More or less deinked pulp --> more or less grey. More or less unbleached pulp --> more or less brown.  With the new wording in chapter 9.3.4 a) we would have to create own balance sheets for every paper grade which we can "distinguish with the naked eye"!!! This will lead to a lot (!) of additional administrative effort and is – from our point of view – unnecessary. For us it's not fully clear, if this is the intention of the new standard. We also think that this is completely opposite: With implementing chapter 9.1.3 (shared credit accounts) the new standard gives more flexibility and with implementing chapter 9.3.4 a) the new standard reduces flexibility noticeable.  We can't see any risk for FSC or for FSC product groups, if the old system for the paper industry is maintained.	Remove terms "fibre" and "paper" from chapter 9.3.4 Include a new chapter: "9.3.7 For pulp and paper products: Input materials of different qualities (e. g. different pulp grades as mentioned in FSC-STD-40-004a, P1.1 – P 1.8) may be combined in the same credit account, if they lead to one product type category on the output side (product type categories as mentioned in FSC-STD-40-004a, Level 1, 2 or 3)."

9.3.4 and 9.3.5	G	<p>These limitations will affect whole industry branches and product types.</p> <p>Eg. decor paper is only available as FSC CW, so no credits for this component. That means no more FSC certified laminated flooring or FSC certified kitchens.</p> <p>Eg. parquet flooring is usually produced from credit of the middle or counter layer. In combination with 3.2.4 it means complete limitation of FSC for the parquet industry.</p>	Analysis the market effect of these new requirements. Be aware of branches, companies and products which will be lost for FSC.
9.3.4 b) and 9.3.5	G	<p>9.3.4 b) and 9.3.5</p> <p>The example of the MDF with a melamine paper top layer contradicts the note in 3.2.4 where decorative paper must not be FSC-certified. In this time there are not enough FSC-certified decorative papers on the market.</p> <p>This regulation decreases the output of FSC-certified particle- / fiberboards and HPL with melamine paper top layer significant.</p>	
9.3.4 b) and 9.3.5	G	<p>The example of the MDF with a melamine paper top layer contradicts the note in 3.2.4 where decorative paper must not be FSC-certified. In this time there are not enough FSC-certified decorative papers on the market.</p> <p>This regulation decreases the output of FSC-certified particle- / fiberboards and HPL with melamine paper top layer significant.</p>	
9.3.4 b) and 9.3.5	G	<p>The example of the MDF with a melamine paper top layer contradicts the note in 3.2.4 where decorative paper must not be FSC-certified. FSC-certified melamine Impregnated papers are not available on the global market in the quality and the amount, which is needed for the wood based panel industry. Therefore it would be no longer possible to produce FSC- certified furniture, if they are made of laminated particle- or fibreboards.</p>	Please change the standard in the sense that impregnated papers with FSC-CW declaration can be used also in future for FSC-certified laminated wood based panels.
9.3.4, 9.3.5 and 9.3.6	T	9.3.4, 9.3.5 and 9.3.6 only serve to create confusion.	Delete 9.3.4, 9.3.5 and 9.3.6.
9.3.4.	T	Probably it should be more evidently stated that it is allowed to combine input materials of different qualities before uploading them to the credit accounting system.	<p>The wording can look as the following:</p> <p>a) Input materials of different qualities may be grouped/consolidated before uploading to a credit account, if the individual components cannot be visually distinguished in the final product with the naked eye.</p>
9.3.4.	G	We welcome the possibility to combine different input materials in the same credit account in the case of fibre products.	
9.3.4.a	T	Why is there a proposal to combine different qualities in the same credit account where individual components cannot be visually distinguished with the naked eye?	This is a nonsense – either the assessment is taken seriously or don't bother. Everybody has a different visual capacity, so this just leads it open to confusion and the statement should be removed.
9.3.4.b	T	<p>We do not understand this specific reference to melamine faced wood-based panels (in this case to MDF), which do not represent any risk comparable to the misuses which were shown as examples during the FSC General Assembly, in Seville.</p> <p>As mentioned above, applying the new proposed requirements for assembled products (i.e. within the credit system requirements) will just generate an excessive and unjustified overburden to these products, when addressing the management of credits for melamine impregnated paper. It should be noted that this type of paper was accepted until recently as a minor component, and no further control was felt necessary.</p> <p>Nothing has changed since then regarding any risks into FSC.</p>	Remove clause 9.3.4. b

9.3.4a)	T	Why is there a proposal to combine different qualities in the same credit account where individual components cannot be visually distinguished with the naked eye?	This is a nonsense – either the assessment is taken seriously or don't bother. Everybody has a different visual capacity, so this just leads it open to confusion and the statement should be removed.
9.3.4b	G	With paper and packaging products the underlying paper is the same while the coating applied is different. These differently coated products will be assembled together for packaging. The wording in the standard is meant to apply to the forest based components.	Change wording: Output products with clearly distinguishable forest based components.....
9.3.4b	G	The wording in the standard does not differentiate between forest-based materials and other components. Example: In cardboard, the internal linerboard may be uncoated while the covering paper may be coated.	Change the wording to “Output products with clearly distinguishable forest based components.....”
9.3.5	T	This requirement will lead to negative impacts for companies using credit accounts for the production of assembled products. In many cases certain parts of the product are only available as FSC Controlled Wood (veneer, decor paper,...) and the respective credit account would not be able to contribute to the output credit calculations. This would mean that these products could not be produced as certified anymore at current market situation, even though 98% would be FSC certified material and no uncontrolled materials would have entered the product!	It should be re-considered if this requirement really would lead to improvements for the credibility of the FSC system and the requirement should be changed / deleted.
9.3.5	T	Separate credit accounts for input type (panels, TFL papers) has the potential to eliminate the possibility of providing the marketplace with FSC certified TFL composites. Suppliers have indicated very low availability and high cost of FSC COC papers. The available TFL product is FSC Controlled Wood. This is a critical issue to any of our customers purchasing FSC Mix Credit TFL composite panel products destined for LEED and other green-building programs as well as customers who wish to increase their supply of FSC as part of their corporate values programs. It is felt that FSC certified base papers will become more available in time, just as FSC CW base papers have. The percentage of wood from TFL papers in a laminated composite panel is very small, and in most cases is less than 1%. It does not make sense to potentially eliminate availability of FSC TFL composites to the market place because this very small component.	State an exemption for TFL papers under this requirement. Or Make a provision for wood components at small percentages (under 5%) to be covered by the FSC credit account of another product in the assembly.
9.3.5	E	“See also Scenario C above.” Not found.	
9.3.5	T/G	The term quality is not the right one.	Use material instead.

9.3.5	G	<p>Separate credit accounts for input type has the potential to be a crippling change.</p> <p>Many BIFMA members are large volume manufacturing users of the credit system which rely on the support of the entire supply chain to support their FSC strategy. The ability to combine credits from multiple input types and to incorporate FSC CW components into certified items, are the elements that have allowed them to provide their customers with a certified product.</p> <p>If the requirement is that all inputs must contribute to the credit claims, then decorative paper becomes prohibitive to an FSC product.</p> <p>This will eliminate any product that contains a laminate micro-paper; a paper edgeband; an alpha paper (used in melamine) and completely eliminate our ability to provide an FSC certified product to any retailer.</p> <p>There are a very finite number of base paper producers in the world today and none, as of this date, provide an FSC claim-contributing input. All are able to provide an FSC CW product. On a global basis this provision will eliminate all furniture and components using melamine (TFL), paper foils, and paper edgebanding from being FSC Certified.</p> <p>In addition, BIFMA members have influenced paperboard back suppliers to become FSC certified as a condition of doing business. Millions of backs are now sold as FSC Mix so that we can apply that credit, along with other input types, into a certified output.</p> <p>Without this incentive to capture FSC credits for use in a wide variety of end items, there is no value in their continued efforts. The need will go from millions of backs to less than 5% of the volume.</p> <p>Lastly – not every supplier is geographically located in an FSC rich environment. An MDF producer in PA will not have the same opportunity to purchase FSC claim-contributing fiber as one in upper Michigan. This will require that they reach outside of their geographic region to attain CCI fiber, increasing the cost.</p> <p>All of these elements are driving away from the fundamental concepts of the credit system toward a 100% pure approach that cannot be supported by large volume manufacturing industry.</p> <p>Potential unintended consequences of these requirements could result in some existing FSC certified companies to consider discontinuing the offering of FSC products in the future.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Eliminate this requirement.</p> <p>Or</p> <p>Provide a minor components derogation for items such as lamination papers, edge banding and other similar products.</p> <p>Or</p> <p>If it's documented that no FSC certified product exists in a product type and the material is less than 5% of the final product then FSC CW would be acceptable without FSC certified credits for this type, however higher value credits are required to cover the CW volume creating an upgrade of materials.</p>
9.3.5	G	<p>Separate credit accounts for input type has the potential to be a crippling change.</p> <p>Many BIFMA members are large volume manufacturing users of the credit system which rely on the support of the entire supply chain to support their FSC strategy. The ability to combine credits from multiple input types and to incorporate FSC CW components into certified items, are the elements that have allowed them to provide their customers with a certified product.</p> <p>If the requirement is that all inputs must contribute to the credit claims, then decorative paper becomes prohibitive to an FSC product.</p> <p>This will eliminate any product that contains a laminate micro-paper; a paper edgeband; an alpha paper (used in melamine) and completely eliminate our ability to provide an FSC certified product to any retailer.</p> <p>There are a very finite number of base paper producers in the world</p>	<p>Eliminate this requirement.</p> <p>Or</p> <p>Provide a minor components derogation for items such as lamination papers, edge banding and other similar products.</p> <p>Or</p> <p>If it's documented that no FSC certified product exists in a product type and the material is less than 5% of the final product then FSC CW would be acceptable without FSC certified credits for this type, however higher value credits are required to cover the CW volume creating an upgrade of materials.</p>



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9.3.5	G	<p>Separate credit accounts for input type has the potential to be a crippling change.</p> <p>Many BIFMA members are large volume manufacturing users of the credit system which rely on the support of the entire supply chain to support their FSC strategy. The ability to combine credits from multiple input types and to incorporate FSC CW components into certified items, are the elements that have allowed them to provide their customers with a certified product.</p> <p>If the requirement is that all inputs must contribute to the credit claims, then decorative paper becomes prohibitive to an FSC product.</p> <p>This will eliminate any product that contains a laminate micro-paper; a paper edgeband; an alpha paper (used in melamine) and completely eliminate our ability to provide an FSC certified product to any retailer.</p> <p>There are a very finite number of base paper producers in the world today and none, as of this date, provide an FSC claim-contributing input. All are able to provide an FSC CW product. On a global basis this provision will eliminate all furniture and components using melamine (TFL), paper foils, and paper edgebanding from being FSC Certified.</p> <p>In addition, BIFMA members have influenced paperboard back suppliers to become FSC certified as a condition of doing business. Millions of backs are now sold as FSC Mix so that we can apply that credit, along with other input types, into a certified output.</p> <p>Without this incentive to capture FSC credits for use in a wide variety of end items, there is no value in their continued efforts. The need will go from millions of backs to less than 5% of the volume.</p> <p>Lastly – not every supplier is geographically located in an FSC rich environment. An MDF producer in PA will not have the same opportunity to purchase FSC claim-contributing fiber as one in upper Michigan. This will require that they reach outside of their geographic region to attain CCI fiber, increasing the cost and the Environmental footprint.</p> <p>All of these elements are driving away from the fundamental concepts of the credit system toward a 100% pure approach that cannot be supported by large volume manufacturing industry.</p> <p>Potential unintended consequences of these requirements could result in some existing FSC certified companies to consider discontinuing the offering of FSC products in the future. And, will further discourage those who are considering starting to offer.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Eliminate this requirement.</p> <p>Or</p> <p>Provide a minor components derogation for items such as lamination papers, edge banding and other similar products.</p> <p>Or</p> <p>If it's documented that no FSC certified product exists in a product type and the material is less than 5% of the final product then FSC CW would be acceptable without FSC certified credits for this type, however higher value credits are required to cover the CW volume creating an upgrade of materials.</p>
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9.3.5	G	<p>Separate credit accounts for input type has the potential to be a crippling change.</p> <p>For large volume manufacturers using the credit system, they rely on the support of the entire supply chain to support the FSC strategy. The ability to combine credits from multiple input types and to incorporate FSC CW components into certified items are the elements that have allowed many manufacturers to provide customers with a certified product.</p> <p>If the requirement is that all inputs must contribute to the credit claims then decorative paper becomes prohibitive to an FSC product. This will eliminate any product that contains a laminate micro-paper; a paper edgeband; an alpha paper (used in melamine) and completely eliminate the ability to provide an FSC certified product to any retailer.</p> <p>There are a very finite number of base paper producers in the world today and none, as of this date, provide an FSC claim-contributing input. All are able to provide an FSC CW product. On a global basis this provision will eliminate all furniture and components using melamine (TFL), paper foils, and paper edgebanding from being FSC Certified.</p> <p>In addition, manufacturers have encouraged paperboard back suppliers to become FSC certified as a condition of doing business. Millions of backs are now sold to us as FSC Mix so that manufacturers can apply that credit, along with other input types, into a certified output.</p> <p>Without this incentive to capture FSC credits for use in a wide variety of end items, there is no value in their continued efforts. The need will go from millions of backs to less than 5% of the volume.</p> <p>Lastly – not every supplier is geographically located in an FSC rich environment. An MDF producer in PA will not have the same opportunity to purchase FSC claim-contributing fiber as one in upper Michigan. This will require that they reach outside of their geographic region to attain CCI fiber, increasing the cost.</p> <p>All of these elements are driving away from the fundamental concepts of the credit system toward a 100% pure approach that cannot be supported by large volume manufacturing industry.</p> <p>Without removing or modifying this requirement, many furniture manufacturers around the world will need to discontinue existing FSC SKU's and cancel plans to develop any in the future.</p>	<p>Eliminate this requirement</p> <p>Or</p> <p>Provide a minor components derogation for items such as lamination papers, edge banding and other similar products</p> <p>Or</p> <p>Provide a minimum % scaled approach to each input type</p> <p>Or</p> <p>If its documented that no FSC certified product exists in a product type and the material is less than 5% of the final product then FSC CW would be acceptable without FSC certified credits for this type, however higher value credits are required to cover the CW volume creating an upgrade of materials.</p>
9.3.5	T	<p>This seems too complicated. As soon as you start to go to the final manufacturing stage, it becomes more and more difficult to apply all of these credit rules. Not allowing wood products in general to account for credits, or to be associated with other wood products as an FSC material will only promote the use of non wood products, where certification is not required up to now. We have to look beyond FSC, which is forests only: for all other products (plastics for example), only system certifications (ISO 14001 ...) exist. We should not discriminate wood by making procedures so complicated that nobody will use it anymore.</p>	
9.3.5		<p>9.3.5 a minimum contribution towards the output credit calculation (e.g., 10%) would be useful. Otherwise there is no limit regarding really low contributions (0,1%; 0,0001%...).</p>	
9.3.5	G	<p>We do not deal with Credit Accounts, but if we chose to pursue that route in our manufacturing, this would be nearly impossible to comply with given the nature of our outputs (architectural millwork).</p>	
9.3.5	T	<p>The way it is currently formulated is not feasible for decor paper. Clarification is needed and the exception of decor paper must be repeated from 3.2.4</p>	<p>Repeat note from 3.2.4 in 9.3.5.</p>

9.3.5	G	The proposed clarifications here for certificate holders of assembled wood products may affect organizations very differently around the world depending on how the original COC systems and management of credit accounts were set-up. There are some organizations who already manage their credit system in this manner and others that do not. Therefore, it's unclear what the final impact will be with these changes, but we can be pretty certain that FSC will see losses in certified companies as well as a major reduction in product availability in the assembled wood product sector and associated supply chains.	
9.3.5		The note from 3.2.4 for decorative paper should explicit be mentioned in 9.3.5	
9.3.5	G	<p>Separate credit accounts for input type has the potential to be a crippling change.</p> <p>Many BIFMA members are large volume manufacturing users of the credit system which rely on the support of the entire supply chain to support their FSC strategy. The ability to combine credits from multiple input types and to incorporate FSC CW components into certified items, are the elements that have allowed them to provide their customers with a certified product.</p> <p>If the requirement is that all inputs must contribute to the credit claims, then decorative paper becomes prohibitive to an FSC product.</p> <p>This will eliminate any product that contains a laminate micro-paper; a paper edgeband; an alpha paper (used in melamine) and completely eliminate our ability to provide an FSC certified product to any retailer.</p> <p>There are a very finite number of base paper producers in the world today and none, as of this date, provide an FSC claim-contributing input. All are able to provide an FSC CW product. On a global basis this provision will eliminate all furniture and components using melamine (TFL), paper foils, and paper edgebanding from being FSC Certified.</p> <p>In addition, BIFMA members have influenced paperboard back suppliers to become FSC certified as a condition of doing business. Millions of backs are now sold as FSC Mix so that we can apply that credit, along with other input types, into a certified output.</p> <p>Without this incentive to capture FSC credits for use in a wide variety of end items, there is no value in their continued efforts. The need will go from millions of backs to less than 5% of the volume.</p> <p>Lastly – not every supplier is geographically located in an FSC rich environment. An MDF producer in PA will not have the same opportunity to purchase FSC claim-contributing fiber as one in upper Michigan. This will require that they reach outside of their geographic region to attain CCI fiber, increasing the cost.</p> <p>All of these elements are driving away from the fundamental concepts of the credit system toward a 100% pure approach that cannot be supported by large volume manufacturing industry.</p> <p>Potential unintended consequences of these requirements could result in some existing FSC certified companies to consider discontinuing the offering of FSC products in the future.</p> <p>In an effort to promote the usage of FSC and their practices, it would</p>	<p>Eliminate this requirement.</p> <p>Or</p> <p>Provide a minor components derogation for items such as lamination papers, edge banding and other similar products.</p> <p>Or</p> <p>If it's documented that no FSC certified product exists in a product type and the material is less than 5% of the final product then FSC CW would be acceptable without FSC certified credits for this type, however higher value credits are required to cover the CW volume creating an upgrade of materials.</p>

		be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.	
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9.3.5	G	<p>Separate credit accounts for input type has the potential to be a crippling change.</p> <p>HNI Corporation is a large volume manufacturing users of the credit system which relies on the support of the entire supply chain to support our FSC strategy. The ability to combine credits from multiple input types and to incorporate FSC CW components into certified items, are the elements that have allowed them to provide their customers with a certified product.</p> <p>If the requirement is that all inputs must contribute to the credit claims, then decorative paper becomes prohibitive to an FSC product.</p> <p>This will eliminate any product that contains a laminate micro-paper; a paper edgeband; an alpha paper (used in melamine) and completely eliminate our ability to provide an FSC certified product to any retailer.</p> <p>There are a very finite number of base paper producers in the world today and none, as of this date, provide an FSC claim-contributing input. All are able to provide an FSC CW product. On a global basis this provision will eliminate all furniture and components using melamine (TFL), paper foils, and paper edgebanding from being FSC Certified.</p> <p>In addition, BIFMA members (including HNI Corporation) have influenced paperboard back suppliers to become FSC certified as a condition of doing business. Millions of backs are now sold as FSC Mix so that we can apply that credit, along with other input types, into a certified output.</p> <p>Without this incentive to capture FSC credits for use in a wide variety of end items, there is no value in their continued efforts. The need will go from millions of backs to less than 5% of the volume.</p> <p>Lastly – not every supplier is geographically located in an FSC rich environment. An MDF producer in PA will not have the same opportunity to purchase FSC claim-contributing fiber as one in upper Michigan. This will require that they reach outside of their geographic region to attain CCI fiber, increasing the cost.</p> <p>All of these elements are driving away from the fundamental concepts of the credit system toward a 100% pure approach that cannot be supported by large volume manufacturing industry.</p> <p>Potential unintended consequences of these requirements could result in some existing FSC certified companies to consider discontinuing the offering of FSC products in the future.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	Eliminate this requirement.
9.3.5	E	<p>“See also Scenario C above.” Not found.</p>	
9.3.5	T/G	The term quality is not the right one.	Use material instead.
9.3.5	G	If there is a chip/fiber exclusion, this section of the standards should read and be exclusive to solid wood. There are some chip fiber products such as paper cups, assembled HDF or MDF products where the only items used are of the same fiber yet they are assembled	Change Wording 9.3.5: For assembled products containing solid wood.....

		products.	
9.3.5	G	<p>Separate credit accounts for input type has the potential to be a crippling change.</p> <p>Our company is a large volume manufacturing user of the credit system which rely on the support of the entire supply chain to support their FSC strategy. The ability to combine credits from multiple input types and to incorporate FSC CW components into certified items, are the elements that have allowed them to provide their customers with a certified product.</p> <p>If the requirement is that all inputs must contribute to the credit claims, then decorative paper becomes prohibitive to an FSC product.</p> <p>This will eliminate any product that contains a laminate micro-paper; a paper edgeband; an alpha paper (used in melamine) and completely eliminate our ability to provide an FSC certified product to any retailer.</p> <p>There are a very finite number of base paper producers in the world today and none, as of this date, provide an FSC claim-contributing input. All are able to provide an FSC CW product. On a global basis this provision will eliminate all furniture and components using melamine (TFL), paper foils, and paper edgebanding from being FSC Certified.</p> <p>In addition, we have influenced paperboard back suppliers to become FSC certified as a condition of doing business. Millions of backs are now sold as FSC Mix so that we can apply that credit, along with other input types, into a certified output.</p> <p>Without this incentive to capture FSC credits for use in a wide variety of end items, there is no value in their continued efforts. The need will go from millions of backs to less than 5% of the volume.</p> <p>Lastly – not every supplier is geographically located in an FSC rich environment. An MDF producer in PA will not have the same opportunity to purchase FSC claim-contributing fiber as one in upper Michigan. This will require that they reach outside of their geographic region to attain CCI fiber, increasing the cost.</p> <p>All of these elements are driving away from the fundamental concepts of the credit system toward a 100% pure approach that cannot be supported by large volume manufacturing industry.</p> <p>Potential unintended consequences of these requirements could result in some existing FSC certified companies to consider discontinuing the offering of FSC products in the future.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology</p>	<p>Eliminate this requirement.</p> <p>Or</p> <p>Provide a minor components derogation for items such as lamination papers, edge banding and other similar products.</p> <p>Or</p> <p>If it's documented that no FSC certified product exists in a product type and the material is less than 5% of the final product then FSC CW would be acceptable without FSC certified credits for this type, however higher value credits are required to cover the CW volume creating an upgrade of materials.</p>

9.3.5	G	<p>Separate credit accounts for input type has the potential to be a crippling change.</p> <p>Many BIFMA members are large volume manufacturing users of the credit system which rely on the support of the entire supply chain to support their FSC strategy. The ability to combine credits from multiple input types and to incorporate FSC CW components into certified items, are the elements that have allowed them to provide their customers with a certified product.</p> <p>If the requirement is that all inputs must contribute to the credit claims, then decorative paper becomes prohibitive to an FSC product.</p> <p>This will eliminate any product that contains a laminate micro-paper; a paper edgeband; an alpha paper (used in melamine) and completely eliminate our ability to provide an FSC certified product to any retailer.</p> <p>There are a very finite number of base paper producers in the world today and none, as of this date, provide an FSC claim-contributing input. All are able to provide an FSC CW product. On a global basis this provision will eliminate all furniture and components using melamine (TFL), paper foils, and paper edgebanding from being FSC Certified.</p> <p>In addition, BIFMA members have influenced paperboard back suppliers to become FSC certified as a condition of doing business. Millions of backs are now sold as FSC Mix so that we can apply that credit, along with other input types, into a certified output.</p> <p>Without this incentive to capture FSC credits for use in a wide variety of end items, there is no value in their continued efforts. The need will go from millions of backs to less than 5% of the volume.</p> <p>Lastly – not every supplier is geographically located in an FSC rich environment. An MDF producer in PA will not have the same opportunity to purchase FSC claim-contributing fiber as one in upper Michigan. This will require that they reach outside of their geographic region to attain CCI fiber, increasing the cost.</p> <p>All of these elements are driving away from the fundamental concepts of the credit system toward a 100% pure approach that cannot be supported by large volume manufacturing industry.</p> <p>Potential unintended consequences of these requirements could result in some existing FSC certified companies to consider discontinuing the offering of FSC products in the future.</p> <p>In an effort to promote the usage of FSC and their practices, it would be greatly beneficial to make sure that the wording and requirements of the standards and systems are clear and concise and do not use ambiguous wording and terminology.</p>	<p>Eliminate this requirement.</p> <p>Or</p> <p>Provide a minor components derogation for items such as lamination papers, edge banding and other similar products.</p> <p>Or</p> <p>If it's documented that no FSC certified product exists in a product type and the material is less than 5% of the final product then FSC CW would be acceptable without FSC certified credits for this type, however higher value credits are required to cover the CW volume creating an upgrade of materials.</p>
9.3.5	E	"See also Scenario C above."	
9.3.5	T/G	The term quality is not the right one.	Use material instead.



9.3.5	T	<p>Rainforest Alliance understands intent of the requirements to ensure that FSC assembled products with claims or labels are made of components that have some sort of FSC value through a credit system. However, we have concerns regarding the increased complexity of the FSC credit system, especially for assembled product manufacturers. This is adverse to the direction of the FSC overall strategy.</p> <p>Additionally, RA does not agree with the need for minor components of assembled based products (paper laminates, paper backers, etc) to have this FSC certified input value. The products are mostly only available as FSC Controlled Wood and have just finished making the transition from non-certified minor components to FSC CW.</p> <p>This requirement can have a drastic effect on the availability of FSC assembled products on the consumer market.</p>	<p>Rainforest Alliance suggest the following:</p> <ul style="list-style-type: none"> <li>• Consider revising 9.3.5 to ensure credit accounts for inputs of value rather than individualized volumes of components.</li> <li>• If 9.3.5 remains, exempt minor components such as paper laminates, paper backers, insulating paper liners, etc from this requirement, allowing them to be sourced as FSC CW only.</li> <li>• Consider the use disclaimer statements as an option to clarify the “FSC certified” components of an assembled product. Approved by FSC directly.</li> </ul>
9.3.5		<p>A requirement of separate credit accounts for different “quality” inputs will have negative impacts on our ability to continue participation in the FSC chain of custody program:</p> <ul style="list-style-type: none"> <li>• The ability to combine credits from multiple input types and to incorporate controlled wood components into certified items are the elements that have allowed us and our customers to provide FSC certified products to the market.</li> <li>• Some components (such as decorative papers and some veneers and other overlays) are not currently available with FSC claims other than controlled wood. This requirement will eliminate a full product line (decorative paper laminated panels), and other laminated or over-laid panels from being FSC certified.</li> </ul> <p>If this change is implemented without clear definition of “inputs of different quality”, the change will result in confusion and misinterpretation of what constitutes the requirement for a separate credit tracking system. Currently “species of wood” is considered an indicator of quality by the 40-004 standard. Will separate tracking systems be required for all different species that go into the manufacture of softwood plywood? Lumber? Composite panels?</p> <p>The additional credit tracking requirements for inputs of different “quality” will add administrative costs to our manufacturing sites that will force us to question the viability of continued participation in the chain-of-custody certification program.</p>	<p>Drop the requirement or eliminate the FSC mix and FSC recycled claims from the chain of custody standard.</p>

9.3.5	G	<p>Separate credit accounts for input type has the potential to be a crippling change.</p> <p>As a current large volume manufacturing user of the credit system we rely on the support of the entire supply chain to support our FSC strategy. The ability to combine credits from multiple input types and to incorporate FSC CW components into certified items are the elements that have allowed us to provide our customers with a certified product.</p> <p>If the requirement is that all inputs must contribute to the credit claims then decorative paper becomes prohibitive to an FSC product.</p> <p>This will eliminate any product that contains a laminate micro-paper; a paper edgeband; an alpha paper (used in melamine) and completely eliminate our ability to provide an FSC certified product to any retailer.</p> <p>There are a very finite number of base paper producers in the world today and none, as of this date, provide an FSC claim-contributing input. All are able to provide an FSC CW product. On a global basis this provision will eliminate all furniture and components using melamine (TFL), paper foils, and paper edgebanding from being FSC Certified.</p> <p>In addition we have influenced our paperboard back suppliers to become FSC certified as a condition of doing business. Millions of backs are now sold to us as FSC Mix so that we can apply that credit, along with other input types, into a certified output.</p> <p>Without this incentive to capture FSC credits for use in a wide variety of end items, there is no value in their continued efforts. The need will go from millions of backs to less than 5% of the volume.</p> <p>Lastly – not every supplier is geographically located in an FSC rich environment. An MDF producer in PA will not have the same opportunity to purchase FSC claim-contributing fiber as one in upper Michigan. This will require that they reach outside of their geographic region to attain CCI fiber, increasing the cost.</p> <p>All of these elements are driving away from the fundamental concepts of the credit system toward a 100% pure approach that cannot be supported by large volume manufacturing industry.</p> <p>Without removing or modifying this requirement, we (and all furniture manufacturers around the world) will need to discontinue existing FSC SKU's and cancel plans to develop any in the future.</p>	<p>Eliminate this requirement</p> <p>Or</p> <p>Provide a minor components derogation for items such as lamination papers, edge banding and other similar products</p> <p>Or</p> <p>Provide a minimum % scaled approach to each input type</p> <p>Or</p> <p>If its documented that no FSC certified product exists in a product type and the material is less than 5% of the final product then FSC CW would be acceptable without FSC certified credits for this type, however higher value credits are required to cover the CW volume creating an upgrade of materials.</p>
9.3.5	T/G	<p>"See also Scenario C above."</p> <p>Not found.</p>	
9.3.5	T/G	<p>The term quality is not the right one.</p>	<p>Use material instead.</p>
9.3.5	G	<p>The focus should not be on tracking inputs of different quality, but rather on inputs from different Product Groups (e.g., lumber, plywood, MDF, etc.).</p>	<p>Remove reference to "quality" and instead reference Product Group.</p>
9.3.5	G	<p>I support this change. If companies object to it, I support the delay of its implementation to allow FSC to mature, gain greater market penetration, and provide greater value prior to the standard becoming stricter.</p>	<p>Keep language, delay implementation.</p>
9.3.5	E	<p>"See also Scenario C above." Not found.</p>	
9.3.5	T/G	<p>The term quality is not the right one.</p>	<p>Use material instead.</p>

9.3.5	E	"See also Scenario C above." Not found.	
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9.3.5	E	"See also Scenario C above." Not found.	
9.3.5	T/G	The term quality is not the right one.	Use material instead.
9.3.5	T	This seems too complicated. As soon as you start to go to the final manufacturing stage, it becomes more and more difficult to apply all of these credit rules. Not allowing wood products in general to account for credits, or to be associated with other wood products as an FSC material will only promote the use of non-wood products, where certification is not required up to now. We have to look beyond FSC, which is forests only: for all other products (plastics for example), only system certifications (ISO 14001 ...) exist. We should not discriminate against wood which this proposal does. Wood will be deselected by making procedures so complicated for it that nobody will want to use it anymore. Forest health and sustainability of that resource is dependent on those renewable resources having economic value making investment in the resource worthwhile.	
9.3.5	G	These chapter would have big impact for all producers of laminated wood based panels, because the FSC certified décor paper is almost not available on the market. The most of the laminated WBPs would lost the FSC label.	Add a note: <b>This requirement does not apply to decorative paper imitating the appearance of wood.</b> or the option FSC controlled wood as mentioned in Advice 40-004-09 from 01.11.2012 otherwise there will be almost no FSC certified laminated décor WBP available on the market
9.3.5	T	Define the term "different quality". Does this mean, different quality or grade of material within the same component or is it different quality specific to a given component type? If manufacturers are required to source FSC certified inputs in each component of an assembled product there will be significant cost and capacity restraints, resulting in less FSC assembled products in the market.	This should requirement should be removed.
9.3.5	G	reference to quality needs to be eliminated- many companies use different levels of quality depending on the particular component going into the final product- one cannot tell the difference between and FSC piece and a Non-FSC piece other than the label- as long it is FSC use of lower quality, where possible as long as the safety and structural integrity is not compromised, will result in better yields in the forest and manufacturing and should be encouraged.	
9.3.5	T	This would put us out of business with regard to our largest market for FSC products which is big box home improvement retail. For the same reasons stated in the 3.2.4, this would take the entire decorative hardwood plywood industry off line as there is no decorative hardwoods available in sufficient quantity to avoid incredible disruption in market place.  Additionally, veneer logs represent the froth of many harvests with typically only a stem or two per acre of this quality and grade. Focusing on decorative grade veneer logs will not drive forest certification the way it does for paper (lots of low grade pulp wood per acre makes FSC certification of large tracts easier.	Allow clearing an FSC claim of Mix inputs (controlled wood or better) by what ever FSC fiber there is in the mix at fabrication subject to substitution rules already in use.  Keep the rules as is (or at least as Rainforest Alliance interprets them for its CHs.)
9.3.5	E	Duplicates, and over complicates requirements set out in 9.3.3	Delete or move to an appendix/annex

9.3.5 & 9.3.4 b	G	Maintaining separate credit accounts per input material and ensuring that each credit account contributes towards the output credit calculation is unachievable in today's environment with regards to laminated papers ( TFL ). Papers are currently FSC Controlled Wood and not available as FSC Mix Credit. Effectively, this eliminates all laminated board as being FSC Certified. This could also adversely impact any LEED related projects.	Delay any changes to the existing requirement to allow for further examination of this item and / or to allow for TFL to catch up in regards to being certified as FSC Mix Credit. However, there will be probably be an increased cost for manufacturers to absorb if they want FSC Mix Credit papers. However, availability of credits may be limited.
9.3.5.c		For assembled wood products made of inputs of different quality, the organization shall establish separate credit accounts per input material and ensure that each credit account contributes towards the output credit calculations.	These rules must be strictly rejected because it would lead to a supply situation as well, where otherwise situation for example the supply of veneer (e.g. oak veneer) for the production of parquet floor would decline immediately and therefore FSC-certified products would disappear from markets to a considerable extent.
9.3.6	T	This requirement is impossible to verify as any organisation can decide what quality they sell. This could apply to making credits for certain species, but refining it to quality will only encourage people to cheat and complicate the auditors' work. In line with the above remarks, we should not make FSC an impossible, complicated system: if FSC allows for Mix products, then a mixing in quality is the result.  How can it be possible that inter-site credits, will be allowed, between different factories and locations, but on the other hand, these rules on quality are introduced?  As a general remark, we feel that for solid wood producers, quality produced veneer or lumber, rules become more and more complicated, but for fiber/paper production, any mix is allowed. This is the promotion of standardised products that are far away from natural diverse wood products.	
9.3.6	G	There are also concerns here about how this requirement may further complicate the establishment of credit accounts and the ability for auditors and certificate holders to remain consistent with its application. Auditors are likely only able to evaluate the declared volumes per grade, and they will not be able to visually audit the correct allocations of grade volumes. This requirement may also encourage more FSC claims on low grade chip products and less on solid wood. At this time, there appears to be no added benefit to this requirement and only creates undue burden on certificate holders.	
9.3.6	G	As in 3.2.4 decorative paper imitating the appearance of wood species were excluded from the regulations, the same should take place here. Paper is only available in cw or fsc mix.	When input material yields a range of output grades (i.e. the same input material generates output materials of different qualities, such as sawn timber, co-products), the organization shall not sell more of a particular grade than is covered by FSC material inputs and its conversion factors per output grade. If the organization wants to combine products which have different conversion factors in the same product group, all applicable conversion factors shall be listed and used separately for the purpose of output credits calculation.  Note: This requirement does not apply to decorative paper imitating

			the appearance of wood.
9.3.6	G	As in 3.2.4 decorative paper imitating the appearance of wood species were excluded from the regulations, the same should take place here. Paper is only available in cw or fsc mix.	When input material yields a range of output grades (i.e. the same input material generates output materials of different qualities, such as sawn timber, co-products), the organization shall not sell more of a particular grade than is covered by FSC material inputs and its conversion factors per output grade. If the organization wants to combine products which have different conversion factors in the same product group, all applicable conversion factors shall be listed and used separately for the purpose of output credits calculation. Note: This requirement does not apply to decorative paper imitating the appearance of wood.
9.3.6	T	Keeping accumulation accounts by lumber grade (categories?) is both costly and of little value. There are numerous categories of lumber grade/thickness/width/length that contribute to value. These values will fluctuate depending on markets, and through time will cross back and forth over value thresholds. Keeping a value/grade based credit accounting process would be difficult and costly. This extra step will cause a significant burden to monitor keep up. Just do not see any benefit in breaking down the lumber into grades on the credit account at all .	Drop this requirement
9.3.6	G	As in 3.2.4 decorative paper imitating the appearance of wood species were excluded from the regulations, the same should take place here. Paper is only available in cw or fsc mix.	When input material yields a range of output grades (i.e. the same input material generates output materials of different qualities, such as sawn timber, <b>co-products</b> ), the organization shall not sell more of a particular grade than is covered by FSC material inputs and its conversion factors per output grade. If the organization wants to combine products which have different conversion factors in the same product group, all applicable conversion factors shall be listed and used separately for the purpose of output credits calculation. <b>Note: This requirement does not apply to decorative paper imitating the appearance of wood.</b>
9.3.6	T	"When input material yields a range of output grades, the organization shall not sell more of a particular grade than is covered by FSC material inputs and its conversion factors per output grade.	Might be technically difficult to track.

9.3.6	G	<p>We cannot see any advantage in this new requirement, neither for certified companies nor for any other stakeholder.</p> <p>This requirement complicates the credit system and will cause significant disadvantages for sawmills. As the demand for FSC certified sawn timber is mostly unbalanced within the output grades and often focusses only on a single grade, this requirement will significantly reduce the output credit for sawmills in this specific grade (resp. the sales volume of FSC certified timber in general). Therefore the output material shall not be separated into different quality grades and the requirement should be cancelled.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>- A sawmill has an input of 1000 m3 of FSC logs</li> <li>- the conversion factor from logs into timber is 0,6</li> <li>- production of 3 different output grades of timber: A, B &amp; C grade)</li> <li>- all 3 output grades are produced in the same quantity (conversion factor is 0,33)</li> <li>- customers are demanding FSC certification only for the A grade</li> </ul> <p>Consequence in this example: With this new requirement the output credit (available FSC volume) for the A grade will be reduced by 66% (200m3 FSC instead of 600m3)!!!</p>	Cancellation
9.3.6	T	<p>A wide variety of factors can go into the identification of grades, and this can vary widely between even similar mills. Before implementing a requirement like this, significant study of the implications across industries and regions would be needed.</p> <p>This requirement also presents a potentially substantial administrative burden for certificate holders, especially small companies. Hardwood sawmills already typically have a large number of credit accounts due to the large number of species – increasing calculations to factor in grade could result in 100+ conversion factors for even a small mill.</p> <p>Additionally, it is important to note that this requirement will make the auditing process difficult, requiring more time and therefore more cost. It is uncertain if auditors could truly evaluate this requirement with accuracy.</p>	<p>Remove requirement, at least until further study can be done.</p> <p>If requirement is maintained, suggest adding the following to minimize administrative burden:  “Classification of grades may be limited to three categories for a single product group.”</p>
9.3.6	G	<p>As in 3.2.4 decorative paper imitating the appearance of wood species were excluded from the regulations, the same should take place here. Paper is only available in cw or fsc mix.</p>	<p>When input material yields a range of output grades (i.e. the same input material generates output materials of different qualities, such as sawn timber, co-products), the organization shall not sell more of a particular grade than is covered by FSC material inputs and its conversion factors per output grade. If the organization wants to combine products which have different conversion factors in the same product group, all applicable conversion factors shall be listed and used separately for the purpose of output credits calculation.</p> <p>Note: This requirement does not apply to decorative paper imitating the appearance of wood.</p>
9.3.6	T	<p>Hard to understand.</p>	<p>Example should be included.</p>
9.3.6	T	<p>Keeping accumulation accounts by lumber grade (categories?) is both costly and of little value. There are numerous categories of lumber grade/thickness/width/length that contribute to value. These values will fluctuate depending on markets, and through time will coss back and forth over value thresholds. Keeping a value/grade based credit accounting process would be difficult and costly</p>	<p>Drop this requirement</p>

9.3.6	G	<p>The reference to grades and quality are confusing. When a log is milled into lumber, there numerous potential outputs (a few large cants, to many small dimension pieces). In North America, the output products are typically measure in foot-board-measure (fbm). Credits are typically produced for the “lumber” outputs. I.e., there is a single credit account for lumber, measured in fbm. For a particular “cut” or “run”, the conversion factor will depend on the outputs. For large dimension products, the conversion factor may be low, whereas if the outputs are small dimension, the conversion factor may be high. However, for a particular cut or run, there is typically only one conversion factor. There is not a factor for each of the individual products that came out of the cut/ run.</p> <p>Credit accounts should not be required for individual products (i.e., one account for 2x4s, one for 2x6s, one for 2x8s, etc. etc.) The credit account should be for the Product Group (i.e., “lumber”, for the example above).</p>	Remove this section entirely.
9.3.6	G	<p>This requirement is impossible to verify. Any organization will decide what quality they sell. This requirement will only encourage people to cheat and complicate the auditors’ work. It is not in FSC’s interest to make FSC an impossible, complicated system: if FSC allows for Mix products, then a mixing in quality is the result.</p> <p>Inter-site credits will be allowed, between different factories and locations, but on the other hand, these rules on quality are introduced and complicate the accounting for these transactions. For solid wood producers, quality produced veneer or lumber, these rules are more and more complicated. For fiber/paper production, any mix is allowed. This is the promotion of standardized products that are far away from natural diverse wood products.</p>	Remove 9.3.6
9.3.6	G	<p>As in 3.2.5 decorative paper imitating the appearance of wood species were excluded from the regulations, the same should take place here. Paper is only available in cw or fsc mix.</p>	<p>When input material yields a range of output grades (i.e. the same input material generates output materials of different qualities, such as sawn timber, co-products), the organization shall not sell more of a particular grade than is covered by FSC material inputs and its conversion factors per output grade. If the organization wants to combine products which have different conversion factors in the same product group, all applicable conversion factors shall be listed and used separately for the purpose of output credits calculation.</p> <p><b>Note: This requirement does not apply to decorative paper imitating the appearance of wood.</b></p>
9.3.6	G	<p>As in 3.2.4 decorative paper imitating the appearance of wood species were excluded from the regulations, the same should take place here. Paper is only available in cw or fsc mix.</p>	<p>When input material yields a range of output grades (i.e. the same input material generates output materials of different qualities, such as sawn timber, co-products), the organization shall not sell more of a particular grade than is covered by FSC material inputs and its conversion factors per output grade. If the organization wants to combine products which have different conversion factors in the same product group, all applicable conversion factors shall be listed and</p>

			used separately for the purpose of output credits calculation. <b>Note: This requirement does not apply to decorative paper imitating the appearance of wood.</b>
9.3.6	G	As in 3.2.4 decorative paper imitating the appearance of wood species were excluded from the regulations, the same should take place here. Paper is only available in CW or FSC mix.	When input material yields a range of output grades (i.e. the same input material generates output materials of different qualities, such as sawn timber, co-products), the organization shall not sell more of a particular grade than is covered by FSC material inputs and its conversion factors per output grade. If the organization wants to combine products which have different conversion factors in the same product group, all applicable conversion factors shall be listed and used separately for the purpose of output credits calculation. <b>Note: This requirement does not apply to decorative paper imitating the appearance of wood.</b>
9.3.6	G	This requirement is impossible to verify. Any organization will decide what quality they sell. This requirement will only encourage people to cheat and complicate the auditors' work. It is not in FSC's interest to make FSC an impossible, complicated system: if FSC allows for Mix products, then a mixing in quality is the result. Inter-site credits will be allowed, between different factories and locations, but on the other hand, these rules on quality are introduced and complicate the accounting for these transactions. For solid wood producers, quality produced veneer or lumber, these rules are more and more complicated. For fiber/paper production, any mix is allowed. This is the promotion of standardized products that are far away from natural diverse wood products.	Remove 9.3.6
9.3.6	E	Duplicates, and over complicates requirements set out in 9.3.3	Delete or move to an appendix/annex
9.3.6.	G	This clause phrasing is confusing and will be extremely difficult to audit.	Rephrase or delete requirement 9.3.6.
9.4.1	G	We support generating FSC credits with recycled content. It can actually reduce the number of trees that are cut down.	
9.4.1	T	9.4.1 Table G Controlled wood shall count as the full quantity as stated on the supplier invoice	Correct table.
9.4.1	G	The equal treatment of pre- and post-consumer recycling paper should also be incorporated in the FSC-STD-40-007, to allow for the omission of a control of material input.	Respective adaptation in FSC STD 40 007 for material input.
9.4.1		I support the recommendation that "pre-consumer" reclaimed paper counts as the full quantity as stated on the supplier invoice. "Pre-consumer" fiber should be valued equally as "post-consumer" fiber since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance. Mandates or labeling schemes that preference "post-consumer" content in products often result in distortions in the market-driven demand/supply balance by driving up prices for some usable fiber while placing an artificial barrier to the use of other equally environmentally beneficial reclaimed paper. Benefits accrue from	



		utilizing all available sources of reclaimed paper, not by singling out a specific source as the one that “counts.”	
9.4.1	G	RockTenn supports the recommendation that “pre-consumer” reclaimed paper counts as the full quantity as stated on the supplier invoice. “Pre-consumer” fiber should be valued equally as “post-consumer” fiber since they provide equivalent environmental benefits and economic value.	
9.4.1	T	It is not understandable and helpful why preconsumer reclaimed paper fiber is counted as FSC input and preconsumer reclaimed wood material like wood chips are not counted. Therefore please include the reclaimed preconsumer wood chips as well	Pre-consumer reclaimed wood chips Counts as the full quantity as stated on the supplier invoice
9.4.1	G	WEPA welcomes that pre-consumer reclaimed paper count as claim-contributing input.	
9.4.1	G	Accounting and Maintenance of Claim-contributing Inputs: GPI supports the recommendation that “pre-consumer” reclaimed paper counts as the full quantity as stated on the supplier invoice. “Pre-consumer” fiber should be valued equally as “post-consumer” fiber since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance. Mandates or labeling schemes that preference “post-consumer” content in products often result in distortions in the market-driven demand/supply balance by driving up prices for some usable fiber while placing an artificial barrier to the use of other equally environmentally beneficial reclaimed paper. Benefits accrue from utilizing all available sources of reclaimed paper, not by singling out a specific source as the one that “counts.” In addition, “post-consumer” content is reclassified as “pre-consumer” when trimmings are created in the printing process. This is an example of how difficult it is to maintain the distinction between the two materials in practice.	
9.4.1	E	9.4.1 Table G Table is informative and not a normative requirement	Move table to an appendix/annex
9.4.1	T	Table G Controlled wood shall count as the full quantity as stated on the supplier invoice	Correct table.
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9.4.1 Table G	T	Controlled wood shall count as the full quantity as stated on the supplier invoice	Correct table.
9.4.1 Table G	E	Table is for information and does not need to be in the main part of the Standard	Move table to an appendix/annex

9.4.1.	E?	See again my first comment  First Comment: “Claim-contributing Input” definition is confusing: It does not describe the “claims”: d) pre-consumer reclaimed wood e) FSC Controlled Wood and in other places I see these two categories as referred to as non-claim (see below). I do not understand: I understand that in B2B claims one can sell “FSC CW” for example, and both d) and e) are legitimate additions to FSC certified materials, so why are they not “claim-contributing”. I think this is going to create misunderstandings.	
9.4.1. Table G	G	Following the comment above about pre-consumer reclaimed wood, FSC should include the materials that follow the same principle, instead of creating exceptions which will be difficult to understand and justify. In case a separate study is necessary to implement this, Sonae Indústria if fully available to cooperate in such work.	Remove the line about ‘Pre-consumer reclaimed wood’, and change the previous line text into: “Pre-consumer reclaimed materials”.
9.4.2	E	Duplication of requirement in 9.3.1	Delete 9.4.2
9.4.2	G	Already addressed in 9.3.1.	Delete 9.4.2.
9.4.2	T	This section does not appear to agree with item 9.3.1 which states organizations can choose between establishing input or output based credit accounts – 9.4.2 indicates that they must be output based accounts.	Change 9.4.2 to reflect 9.3.1
9.4.3	T	We strongly support this because we all realize that there is a deficit of certified fibre offer vis-a-vis demand. Once the wood is coming from a certified forest, it is not understandable that it “loses” its certification status after 12 months, when entering a mill that works according to the volume credit system and has a credit control system perfectly implemented. Maintaining the initial status of FSC certified raw-materials would bring more offer of certified fibre to the market (and more FSC products) and would pay justice to its origin.	
9.4.3	G	In support of the 5 year credit system. This allows the credit bank situation to be better utilized. Extending the life of the credit increases the value of the credits. It also helps the supply/demand imbalance. Extending to 5 years will provide channel partners the assurance of long term support/supply of FSC to support their business strategies.	
9.4.3	E	The change in expiration of credits from 12 months to 60 makes sense, reducing the likelihood of purchased FSC credits being sold as non-FSC.	
9.4.3	G	The extension to sixty (60) month will be explicit supported. In this way the credit system will be more practical and the decay from not used credits will be avoided.	
9.4.3	G	We support the extended period for credit accumulation. This will be helpful to manage variation in the schedule of high volume manufacturers.	
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9.4.3	T	We strongly support this because we all realize that there is a deficit of certified fibre offer vis-a-vis demand. Once the wood is coming from a certified forest, it is not understandable that it “loses” its certification status after 12 months, when entering a mill that works according to the volume credit system and has a credit control system perfectly implemented. Maintaining the initial status of FSC certified raw-materials would bring more offer of certified fibre to the market (and more FSC products) and would pay justice to its origin.	
9.4.3	G	We support the extended period for credit accumulation. This will be helpful to manage variation in the schedule of high volume manufacturers.	
9.4.3		This is positive and 5 years is a reasonable time frame.	
9.4.3	E	The move to 5 years from 1 year is a large jump. In some ways this is helpful, as per the new requirements in 9.3.2, etc. However, some companies have relatively simple CoC accounting (i.e. have one product type) and so maintaining one account for 5 years is actually cumbersome.	We suggest that the accounting period be up to 5 years, but not less than 1. Companies specify their accounting period (i.e. 3 years) and then are audited to it. Another option could be timing based on type of credit.
9.4.3	G	Evergreen Packaging supports FSC’s proposed change to a 60 month credit accumulation basis. We see no reason for keeping the 12 month accumulation standard as it does not provide enough buffer to address changes in FSC material supply and demand. We have worked hard to develop our FSC program and are disappointed when we have to retire credits based on the current 12 months requirement. Sustainable strategies for both certified fiber procurement and sales of certified products operate on a longer time-scale than 12 months.	
9.4.3	E	As it is, especially the second sentence is quite confusing so please simplify this requirement.	
9.4.3	G	We see it very important that the validity period of the credits is lengthened.	
9.4.3	G	We are strongly against increasing the credit expiry timeframe to 60 months, as we fear it could have a negative impact on the incentive to source certified material if companies can accumulate credits over five years. Added to that it becomes increasingly difficult for auditors to verify the available amount of credits.	Reduce the expiry timeframe to 24 months at most.
9.4.3	T	Great that 12 month rule has been changed to 60 month in order to adapt FSC’s standard to business conditions. But we propose to give exemptions to production processes that exceed 60 month based on a CB evaluation	Addition of this scenario: The organization shall not accumulate more FSC credit in the credit account than the sum of new FSC credit that has been added during the previous sixty (60) months. Any FSC credit that exceeds the sum of new FSC credit shall be deducted from the credit account at the start of each new claim period. NOTE: The 60 months maximum period can be extended to the average products production period where the products production period is longer than 60 months and approved by the organization’s certification body.
9.4.3	T	The period of 60 months is too long. Relevant buyers of FSC raw material could organize easily a boycott of FSC-certified Forest operations during a number of years, if they were able to load their credit account with enough volume. In Germany the usual period for governments is 4 or 5 years. Most of the FSC forest area in Germany depend of government decisions to certify their forests. This could result that the timber industry could cause a low level of FSC demand	24 months

		to pressure governments to de-certify their forests.	
9.4.3	E	As it is, especially the second sentence is quite confusing so please simplify this requirement.	The maximum validity of credits shall not exceed sixty (60) months.
9.4.3	G	FSC Russia supports the extension of credit expiration to five years. According to consultations with the National Standard Development Group and Stakeholders this modification allows CHs to have more flexibility. However some of the CHs (i.e. UPM-Chudovo) outlined that the limitation of credit expiration to 1 year had a good disciplinary impact on them.	No change required
9.4.3	G	There are varying perspectives on the proposal to extend the expiration of credits to 5 years for stakeholders in North America. Some support the extension to five years, while others support a general extension, but believe 5 years is too long and perhaps 3 years would be better. Additionally, the extension will parallel the tightening of the requirements in the rest of the credit system section. This synchronization between life of the credits and credit establishment will help ensure that with added rigor to the establishment of credit accounts, certificate holders will not have to be concerned about losing earned credits before they can be effectively used. Alternatively there has been some discussion about having a variable credit duration based on the type of credit.	
9.4.3	G	We support accumulating credit in an account for 60 months.	No change required.
9.4.3		We appreciate explicit the new value time of 60 months for FSC credits.	
9.4.3	G	We support the extended period for credit accumulation. This will be helpful to manage variation in the schedule of high volume manufacturers.	
9.4.3	G	We support the extended period for credit accumulation. This will be helpful to manage variation in the schedule of high volume manufacturers.	
9.4.3		This is long overdue. When you're harvesting timber that's 40 to 100 years old, having 12 months to use the credits didn't seem practical. On my end this will require more work to keep track of, but it's a good change	
9.4.3	G	The increase in credit expiration time from 12 months to 60 months is beneficial and saves companies from losing money if FSC product does not sell as quickly as projected.	This is a good benefit of the new standard
9.4.3		It just came to my attention that the draft standard extends the period for credit expiry under the credit system from 12 to 60 months. This seems too long to us.	We think that if FSC feels that the expiry period needs to be extended, then shorter time period — say 24 months — should be the maximum.
9.4.3	T	It is a positive step to go to 60 months for expiring credits. I do not see an issue with allowing them to never expire, if the accounting is correct and audited by a CB there is no risk.	Remove 9.4.3
9.4.3	T	Only this section mentions a 60-months time period, all others in this Standard are 12 months. 60 months would make tracking and audit a lot more difficult, so why was the change suggested?	Justify the change from 12 months.
9.4.3		I support the recommendation to extend the effective life of credits to 60 months.	
9.4.3	T	The expiration of credits within a credit account after one year is a concern to some manufacturers. The reality of transportation and storage of FSC certified materials and production realities needs to be balanced versus maintaining credibility in the FSC system. One year is too short and five years is probably too long. A more realistic	

		time period needs to be defined.	
9.4.3	G	We support the extended period for credit accumulation. This will be helpful to manage variation in the schedule of high volume manufacturers.	
9.4.3	G	We see it very important that the validity period of the credits is lengthened.	
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9.4.3	G	We support the extended period for credit accumulation. This will be helpful to manage variation in the schedule of high volume manufacturers.	
9.4.3	G	The extension to sixty (60) month will be explicit supported. In this way the credit system will be more practical and the decay from not used credits will be avoided.	
9.4.3	G	The 60 month credit accumulation reflects ensures that investments in certified input materials can be procured and inventoried with greater assurance in our ability to make use of them in certified output materials for consumer use.	Keep as worded.
9.4.3	G	We support increasing the length of the expiration period from 12 months to 60 months.	
9.4.3	T	Strongly endorse this extension. / This should add greatly to the value of raw materials carrying an FSC claim. If the lifespan of value of the credits is quintupled, it could incite more manufacturing facilities to become more engaged in purchasing FSC raw materials, thus increasing demand for more forest land owners to become FSC certified.	Awesome improvement of the standard which could go a long way toward increasing FSC certification of both lands and manufacturing facilities due to increased value of products.
9.4.3	G	We support the extended period for credit accumulation. This will be helpful to manage variation in the schedule of high volume manufacturers	
9.4.3	T	Delete this 60 month shelf life requirement as this is not logic at all. Why shall the value of FSC certified wood be dropped after a certain time period. There is also an unequal treatment compared to labelled products or shall the label be cut out from a product when the time period is over ?	
9.4.3	G	The increase in credit expiration time from 12 months to 60 months is beneficial and saves companies from losing money if FSC product does not sell as quickly as projected.	None
9.4.3	G	We see it very important that the validity period of the credits is lengthened.	
9.4.3	G	60 month period: Companies in Sweden do not need 5 year to balance their credit accounts. But 12 months are for some assortments considered to be a short period. Since wood are traded by many companies along the value-chain the 60+60+60... month periods to keep credits is likely to much for the credit systems credibility. If customers are buying an FSC product and then understand that they a promoting certified forestry that occurred years ago the important link between the forest owner and consumer are weakened	Reconsider the 60 month period. We must balance the boundaries of the so often questioned credit system with the flexibility. We don't want more things that can be criticized regarding the credit
9.4.3		Great proposal to extend credit "shelve life" to 60 months.	Keep credit expiry as proposed – 60 months.
9.4.3	T	We feel that increasing the credit storage from 24 to 60 months is too long and may become difficult to audit, while not incentivizing	We propose to reduce the number of years to a maximum of 3 years.

		further certification during that period.	
9.4.3	G/T	The given timeframe (now 5 years instead of 1 year) means that a company can stop buying certified material now, but still sell certified products in five years, if credit is available. What is the aim of that?	Do not change from 12 to 60 months.
9.4.3	G	The extended period to accumulate credits is a positive approach as it allows the management of variations in the demand for FSC Certified products	
9.4.3	G	A longer credit accumulation period is positive.	
9.4.3	g	60 month credit account	Draft language is excellent. A great addition to standard
9.4.3	G	WEPA welcomes the prolongation of the claim period to sixty (60) months.	
9.4.3		5 years is long and may become difficult to audit	Change 5 years to 3 year
9.4.3	G	The wording for “credit lifespan” has always been very confusing. It needs to be clarified. The intent was that credits only lasted 12 months. Now they will last 60 months.	Revise the wording to make it plain and simple. Credits last 60 months. After 60 months they expire. The credit account balance must always be above zero.
9.4.3	T	<p>Giving credits longer shelf life will limit mills’ need to buy more certified logs which reduces demand and makes the certified log market even more inconsistent than it already is.</p> <p>We should be careful to weigh the consequences of longer credit life and cross site credit sharing on demand for certified logs and landowner impact.</p> <p>Ultimately, credit expiration is an issue of low demand. If there was greater demand companies would not be losing large volumes of unsold credits, mills would be buying more FSC certified logs to meet the demand and landowners would see more consistent demand for their certified logs.</p> <p>We need to fix the real issue of low demand, not the symptom of expiring credits.</p> <p>If we open the door to longer credit shelf life it should be framed as an issue of certified mill retention with a sunset clause .</p>	<p>Keep 40-004 V2 language: “sum of input over 12 months.”</p> <p>If the pressure is too great and credit life is extended, consider a change to 24 months. Doubling is more prudent than 500% increase in shelf-life.</p>
9.4.3	T	We strongly support this because we all realize that there is a deficit of certified fibre offer vis-a-vis demand. Once the wood is coming from a certified forest, it is not understandable that it “loses” its certification status after 12 months, when entering a mill that works according to the volume credit system and has a credit control system perfectly implemented. Maintaining the initial status of FSC certified raw-materials would bring more offer of certified fibre to the market (and more FSC products) and would pay justice to its origin.	
9.4.3	G	The extension to sixty (60) month will be explicit supported. In this way the credit system will be more practical and the decay from not used credits will be avoid.	
9.4.3	G	<p>We wish to express support to the following proposed revisions to FSC-STD-40-004 V3-0 EN found Part 6, Sales, and Part 9, Credit System –</p> <ul style="list-style-type: none"> <li>• 9.4.3 – The 60 month credit accumulation reflects ensures that investments in certified input materials can be procured and inventoried with greater assurance in our ability to make use of them in certified output materials for consumer use.</li> </ul>	
9.4.3	G	We support the extension to sixty months for the life of accumulated credits in the credit accounting system.	
9.4.3	T	Don’t support the accumulation over a 60 month period as more FSC input should be sought by a company.	Change accumulation period to a maximum of 36 months.

9.4.3.	T	Initially the idea of credits deduction after 12 months was more likely to motivate companies to use their FSC credits more actively and to promote FSC via more FSC-labeled products. However it does not really work. At the same time, extension of this period up to 60 months even more make the idea of credits deduction useless. Therefore it makes sense just to remove this requirement, which would make credit accounting systems more simple, transparent and less labour-intensive.  If this indicator is still active, then there is a question whether this change applicable to the historic records of previous 60 months? (i.e. will the certified company have opportunity to recalculate credit deduction for previous periods?)	To remove this indicator  OR at least to add a NOTE that a Company which has already had FSC credits system in place has opportunity to recalculate the credit deduction scheme following the new requirement, but only for the historic period for which all credit records are available and have the same structure and accounting system
9.5.1	T	Withdrawing credits now limited to the sale rather than to the sale or labelling of products.	We currently use labelling as the point at which we reduce credits from our account – much easier to track this way. Is there some reason for pulling out labelling as an option for withdrawing from credit accounts? Please add back in to allow for flexibility in withdrawing from credit accounts in the way that works best for the particular organization.
9.5.1		All of our products that carry FSC on-product labels are sold with the FSC claim and thus the credits are deducted from the credit account based on the quantity of labelled products.	Keep this requirement similar to the current 9.4.1 requirement.
9.5.2.	E	“Up-to-date” is a bit vague and uncertain	NOTE: Up-to-date means that the most recent update of the credit account should not be older than a claim period defined for a specific product group
9.6.1	T	9.6.1 mentions about “claim period” and “job order” whereas 9.2.1 only mentions about “claim period”. Consistency is needed.	
9.6.1.	T	Reference to ‘claim period or job order’ within the credit system is confusing, as already mentioned above.	Revise wording of clause 9.6.1. to clarify what is actually the requirement.
9.6.2	T	9.6.2 CW credit account I know this is not a new requirement, but to my knowledge it has never been implemented and makes no practical sense. If input requirements are met, then non-certified outputs are by definition qualified to be sold as FSC CW. Requiring FSC CW credit accounts adds cost and hassle but no value.	Take the opportunity to correct this error.
9.6.2	G	What is the role of FSC Controlled Wood credit account?	
9.6.2	G	Why is it necessary a Controlled Wood Credit Account as it makes no practical sense? If input requirements are applied, then non-certified outputs are (by definition) qualified for sale as FSC CW. Application of credit accounting procedures is superfluous and just adds costs without value.	
9.6.2	T	This item discusses having a FSC controlled wood credit account. First, it reads as if unused credits should be sold as controlled wood – I don’t think that’s the intention but it could be interpreted that way. Also, what is a “controlled wood credit account?”	This is the first time the term ‘controlled wood credit account’ is used and I have no idea what this means. I think the authors are simply saying volume of controlled wood available – but it’s certainly not a “credit account” and probably should not be labelled that way unless the intent is to have a “separate account.” Also, standard needs to be more clearly written to understand what the authors are referring to in

			supplying controlled wood.
9.6.2	T	Second sentence is inconsistent with clause 3.3.1, which defines sales of FSC W materials purchased as FSC CW is to be controlled under 40-004.	Remove “per FSC-STD-40-005” from the requirement.
9.6.2	G	What is the role of FSC Controlled Wood credit account?	
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9.6.2	G	What is the role of FSC Controlled Wood credit account?	
9.6.2	T	It states “In this case, the sale of FSC Controlled Wood shall be covered by the scope of the organization’s COC certificate per FSC-STD-40-005.” Not all parts of FSC-STD-40-005 are applicable.	It could state instead: “In this case, the sale of FSC Controlled Wood shall be covered by the scope of the organization’s COC certificate per applicable parts of FSC-STD-40-005.”
9.6.2	G	What is the role of FSC Controlled Wood credit account?	
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9.6.2	G	What is the role of FSC Controlled Wood credit account?	
9.6.2.	T	If the organisation is using the credit system for a product group, it should have only certified or controlled inputs for this product group. As such, all the products which are not sold with a credit claim from this product group can be sold with the FSC Controlled Wood claim. Why is there a need for a FSC Controlled Wood credit account?	Clarify intent of reference to ‘FSC Controlled Wood credit account’ in clause 9.6.2.
10.0 labelling	T	Reduction from 85% to 70% is welcomed by BM TRADA Impact on FSC-STD-40-007	
10.0 labelling	G	Minimum of 70% FSC Content to be Able to use the FSC logo on Printed products I just wanted to raise a flag here and to mention something that you perhaps have not considered. Should you proceed with the minimum requirement of having 70% FSC content that needs to be in the paper in order to use the FSC logo, you have to realize that there will be a high number of printers that will no longer choose to be FSC certified, as there simply isn’t enough papers that would qualify to use the logo. Most of the printed items that do hold the FSC logo currently are using paper that has 30% FSC content or less. There aren’t enough options for paper and the 100% FSC sheets are significantly more expensive, so they are prohibited to a lot of Corporations. Don’t be surprised if you lose a high percentage of the printers who are currently certified. WE CAN’T ALWAYS SEE THE TREES WHEN WE ARE STANDING IN THE FOREST. I would reconsider this proposed change very carefully.	If you changed the minimum to 30% FSC there are still enough papers in the industry that would qualify and so you would still retain the same number of printers. For the numerous papers that are only 10% FSC, it would encourage those mills to add another 20% to their sheets in order to retain their FSC labels so everyone wins.
10.0 labelling	T	Today retailers who want to promote products in FSC labelled packaging face the issue that the filler of the packaging is usually not FSC COC certified and therefore no FSC invoice information is provided to the retailer and therefore no FSC product promotion is allowed. As the chain of custody ends with the production and labelling of the final product (the packaging) the FSC label on product should provide sufficient evidence to allow retailer promotion	10.1.5 Retail organizations applying for FSC product promotion shall ensure that products are carrying the FSC label as specified in FSC-STD-50-001
10.0 Labelling - Table H	E	In table H, spelling of "Recyled" is not correct	Spell it Recycled



10.0 labelling Table H	E	The term FSC mix label is used in the FSC label column.	Delete label after FSC mix label under FSC mix credit claim.
10.0 Note below table H	G	Note for stakeholders to table H, the description of how to use FSC Recycled and labelling as FSC Mix should be reflected more clear in the table H	To add one more row with the option described in the comment.
10.1.0	G	FSC Russia supports the initiative to review labeling thresholds for FSC Recycled for percentage system and change the thresholds for paper products to FSC Recycled percentage claim of 100% (pre- and post-consumer reclaimed) and 70% of post-consumer reclaimed for wood products.	No change required
10.1.1	E	Note is not necessary since the sentence above states the requirement.	Delete Note.
10.1.1	E	Wrong word (promoted)	Should be changed to "labelled"
10.1.1	E	Note is not necessary since the sentence above states the requirement.	Delete Note.
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10.1.1	E	Note is not necessary since the sentence above states the requirement.	Delete Note.
10.1.2	G	Eligibility for labelling: AF&PA supports the inclusion of "pre-consumer" reclaimed paper in FSC Recycled and FSC Mix labels. "Pre-consumer" fibre should be valued equally as "post-consumer" fibre since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance. One of the barriers to increased paper recovery for recycling is the distinction made between so-called "pre-" and "post-consumer" fibre. Mandates or labelling schemes that preference "post-consumer" content in products often result in distortions in the market-driven demand/supply balance by driving up prices for some usable fibre while placing an artificial barrier to the use of other equally environmentally beneficial reclaimed paper. Benefits accrue from utilizing all available sources of reclaimed paper, not by singling out a specific source as the one that "counts."	
10.1.2	T	The concept of giving pre-consumer reclaim equal recognition as an eligible FSC input the same as FSC post-consumer reclaim makes sense, and encourages the responsible use of resources. Pre-consumer wood reclaim should be recognized in the same manner as pre-consumer paper.	Give equal recognition to pre-consumer reclaim wood as an eligible input as with post-consumer reclaim wood and pre-consumer reclaim paper.
10.1.2	T	Eligibility for labelling: We support the inclusion of pre-consumer reclaimed paper as an eligible input. The pre-consumer inputs should be valued equally as a post-consumer input.	
10.1.2	E	10.1.2. Table H Table is informative and not a normative requirement	Move table to an appendix/annex
10.1.2	G	We support the proposition to reduce the labelling threshold of FSC recycled wood products from 85 % to 70 %.	

10.1.2	T	Lowering the label threshold will probably result in more use of the recycled label. With the differentiation of wood and paper products this might be a could solution.	
10.1.2	G	Support lowering the recycling threshold to 70% as it is still high and will allow more recycled products to be FSC certified.	
10.1.2		I support the inclusion of “pre-consumer” reclaimed paper in FSC Recycled and FSC Mix labels. “Pre-consumer” fibre should be valued equally as “post-consumer” fibre since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance. One of the barriers to increased paper recovery for recycling is the distinction made between so-called “pre-” and “post-consumer” fibre. Mandates or labelling schemes that preference “post-consumer” content in products often result in distortions in the market-driven demand/supply balance by driving up prices for some usable fibre while placing an artificial barrier to the use of other equally environmentally beneficial reclaimed paper. Benefits accrue from utilizing all available sources of reclaimed paper, not by singling out a specific source as the one that “counts.”	
10.1.2	G	We support the proposition to reduce the labelling threshold of FSC recycled wood products from 85 % to 70 %.	
10.1.2	G	We support the proposition to reduce the labelling threshold of FSC recycled wood products from 85 % to 70 %.	
10.1.2	G	We support the proposition to reduce the labelling threshold of FSC recycled wood products from 85 % to 70 %.	
10.1.2	T	Keep it simple. Consumers do not know the difference between the claims	FSC
10.1.2	G	Eligibility for labelling: RockTenn supports the inclusion of “pre-consumer” reclaimed paper in FSC Recycled and FSC Mix labels. “Pre-consumer” fibre should be valued equally as “post-consumer” fibre since they provide equivalent environmental benefits and economic value.	
10.1.2	G	FSC claims for the outputs of FSC Recycled at percentage system leads to some questions. For example, how the percentage threshold can be set up for product consisting of paper components and wood components?	N/A
10.1.2	G	We support the proposition to reduce the labelling threshold of FSC recycled wood products from 85 % to 70 %.	
10.1.2	G	UPM supports the proposition to reduce the labelling threshold of FSC recycled wood products from 85 % to 70 %.	
10.1.2	G	UPM supports the proposition to reduce the labelling threshold of FSC recycled wood products from 85 % to 70 %.	
10.1.2	G	UPM supports the proposition to reduce the labelling threshold of FSC recycled wood products from 85 % to 70 %.	
10.1.2	G	During the survey on pre and post-consumers credit accounting and labelling, several NGOs, including WWF, asked that an option be maintained in tracking post-consumer under the different systems and that a labelling option precising the % of post-consumer content be offered, as in several countries, consumers or public procurement ask to have this information.	Add the possibility to track and publish the percentage of post-consumer recycled content on “FSC recycled”

10.1.2	G	<p>Eligibility for labelling: GPI supports the inclusion of “pre-consumer” reclaimed paper in FSC Recycled and FSC Mix labels. “Pre-consumer” fibre should be valued equally as “post-consumer” fibre since they provide equivalent environmental benefits and economic value to papermakers who use them as best meets customer needs in terms of product quality, cost, functionality and performance. One of the barriers to increased paper recovery for recycling is the distinction made between so-called “pre-” and “post-consumer” fibre. Mandates or labelling schemes that preference “post-consumer” content in products often result in distortions in the market-driven demand/supply balance by driving up prices for some usable fibre while placing an artificial barrier to the use of other equally environmentally beneficial reclaimed paper. Benefits accrue from utilizing all available sources of reclaimed paper, not by singling out a specific source as the one that “counts.”</p> <p>In addition, “post-consumer” content is reclassified as “pre-consumer” when trimmings are created in the printing process. This is an example of how difficult it is to maintain the distinction between the two materials in practice.</p>	Remove any wording that distinguishes the difference between pre and post-consumer recycled content.
10.1.2 (table H)	G	Option missing	Include the option to use FSC label “FSC Mix” using output with FSC claim FSC Recycled Credit and FSC Recycled percentage of at least 70 % in each control system
10.1.2 Table H	G	In the FSC claims for the outputs for paper products under the percentage system, we support the FSC recycled percentage of 100% reclaimed (pre- and/or post-consumer) and the deletion of the minimum threshold percentage requirement of 85% for post-consumer reclaimed materials and the flexibility it provides for organizations to use the FSC Recycled label.	
10.1.2 Table H	E		Remove the word “label” in the 3rd line “FSC Mix label”..
10.1.2 Table H	G	<p>Following the comment above about pre-consumer reclaimed wood, FSC should include the materials that follow the same principle, instead of creating exceptions which will be difficult to understand and justify.</p> <p>In case a separate study is necessary to implement this, Sonae Indústria if fully available to cooperate in such work.</p>	Remove the references about ‘Wood products’, and change remove the introductory text in the same lines (“paper products”).
10.1.2. Table H	E	Table is for information and does not need to be in the main part of the Standard	Move table to an appendix/annex
10.1.3	G	There are too many big organisations that receive “approval” not to comply to the general rules. For organizations it is not possible to check.	
10.1.4	G	It feels inappropriate to reference advice notes and codify them as standards/requirements. S	Specifics should be added here rather than referring to an old advice note.
10.1.4	T	Why is the ADV 50-003 not included in this new CoC standard.	Maybe FSC small and community label should be in table above?
10.1.4	T	Why is the ADV 50-003 not included in this new CoC standard.	Maybe FSC small and community label should be in table above?

10.1.5	T	<p>Today some companies use the FSC added value in their purchasing documentation only without labelling the products.</p> <p>By doing so the added value of FSC is lost at the consumer stage. We experience consumers confusion by such a behaviour as there is the possibility that wood/paper products can have the same value like labelled products.</p> <p>Without a labelling consumers will not learn about FSC which counteracts the FSC Strategy 2020</p> <p>In addition these volumes are dumped as they are not available for companies willing to label.</p> <p>Therefore a clause is needed demanding that final products can only be sold as FSC certified when the label is used on the items.</p>	10.1.4 Organizations shall only mark final products as “FSC” in the invoice when the final product is containing the FSC label.
11 Outsourcing	T	Add a new criterion under this section to not allow outsourcing to any certificate holder that is currently disassociated with FSC. As it stands now a disassociated company can still be used to outsource the production/processing of FSC materials/products.	The organization shall not establish an outsourcing agreement with a certificate holder that is disassociated with FSC.
11 Outsourcing	G	The standard should make clear, that forest contractors are not within the scope of the provisions for “Outsourcing to contractors”.	
11.0 outsourcing	T	Ensure consistency with FSC accreditation standards FSC-STD-20-001? and FSC-STD-20-011	
11.0 outsourcing	T	It seems strange that these relatively minor issues (outsourcing and complaints handling) should now occupy such space! Are these requirements really necessary, with this degree of detail? Doesn't the current wording of the standard suffice? For me it does, and this gives unnecessary attention to issues that are not crucial and in general not a source of troublesome non-compliances.	Maintain current wording on these issues.
11.0 outsourcing	E	11 Note1, 2, and 3 Note is advise to CB's	Delete and move to 20-011
11.0 Outsourcing	G	The standard should make clear, that forest contractors are not within the scope of the provisions for “Outsourcing to contractors”.	
11.0 outsourcing	G	This entire section is both longer and less clear than the existing Section 12, which in itself is longer and more complex than it ought to be.	
		These requirements can and should be drastically consolidated and simplified.	
11.0 outsourcing	G	The standard should make clear that forest contractors are not within the scope of the provisions for “Outsourcing to contractors”.	
11.0 outsourcing	G	This entire section is both longer and less clear than the existing Section 12, which in itself is longer and more complex than it ought to be.	
		These requirements can and should be drastically consolidated and simplified.	
11.0 outsourcing	G	The standard should make clear that forest contractors are not within the scope of the provisions for “Outsourcing to contractors”.	
11.0 Outsourcing	E	This section is long, wordy and works very hard to say only a few important things. In addition, Notes in this section are instructions to the certification body and belong in the Accreditation Standard (20-011)	Delete all notes from Clause 11.1.5

11.0 Outsourcing		<p>Regarding this topic I'd like to make an example:</p> <p>You are a producer of FSC products and don't want to bring them to the customer by yourself. So you decide to send them via a logistics company, let's say DHL.</p> <p>If I interpret this correctly, this would be a "high risk outsourcing" according to the current draft-status because NOTE 1 e) is fulfilled: "The contractor does not physically return the products to the organization."</p> <p>The certification body may downgrade the risk to "low" (because NOTE 3 d) is fulfilled), but at least the basic requirements have to be fulfilled (11.1.5 a-d).</p> <p>One of the basic requirements is, that the contractor should "accept the right of the organization's certification body to audit the outsourced contractor". I'm 100 % sure that the "Deutsche Post" will not agree with audits in their post offices, distribution centers or warehouses, carried out by our certification body. So, even if it is "low risk outsourcing", this requirement can't be fulfilled.</p> <p>This may be a very special example, but we think that also similar examples (with other logistics companies) would also lead to unnecessary effort or impossibilities.</p> <p>We are not sure if this was intended when the draft was written. From our point of view warehousing, storage, distribution and logistics are no FSC relevant tasks and we can't see any risks for FSC / FSC products, when above mentioned clarification will be implemented in the new standard.</p>	<p>Remove "11, NOTE 3, d" (topic where this activities are mentioned) from the draft</p> <p>Include a clarification / additional point: "11.3: The requirements of this chapter 11 do not refer to the following activities: Warehousing, storage, distribution and logistics of clearly marked and identifiable packages or pallets by service providers (e. g. logistics companies).</p>
11.0 outsourcing		Outsourcing should be limited to activities that are tied to processing and/or manufacturing. All activities tied to logistics such as storage, transportation, cross-docking and handling, containerization should not be included in outsourcing process.	Remove activities tied to logistics such as storage, transportation, cross-docking and handling, containerization from the outsourcing process.
11.0 outsourcing	G	The standard should make clear that forest contractors are not within the scope of the provisions for "Outsourcing to contractors".	
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11.0.0	G	11 Outsourcing The standard should make clear, that forest contractors are not within the scope of the provisions for "Outsourcing to contractors".	
11.1 Outsourcing	T, E	It should be clearly mentioned in the text that the outsourcing requirements do not cover harvesting and subsequent transportation.	
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11.1.0	G	It should be clearly mentioned in the text the outsourcing requirements do not cover harvesting and subsequent transportation.	

11.1.0	G	Clarify that forest contractors and transport companies delivering round wood are not included as an outsourced activity	
11.1.0	T, E	It should be clearly mentioned in the text the outsourcing requirements do not cover harvesting and subsequent transportation.	
11.1.0	T, E	It should be clearly mentioned in the text the outsourcing requirements do not cover harvesting and subsequent transportation.	
11.1.0	T, E	It should be clearly mentioned in the text the outsourcing requirements do not cover harvesting and subsequent transportation.	
11.1.1	T	See comments on definition of Outsourcing (This definition seems to propose that outsourcing may only take place in a third party situation, and would not allow outsourcing between sites owned by the same company. Meaning, this proposed change would require a multisite manufacturing location, which maybe only provides one function out of many related to FSC, to be added to the certificate. This would drive up audit costs with little added benefit. )	
11.1.1	T	<p>Proposal for amendment procedures in FSC certification – Chain of Custody chain, applicable to the industrial process (production of expanded agglomerated cork), and the whole concerned chain. The main objective of this proposal is related to the purpose of presenting the underlying difficulties of this industry to maintain and expand the quantity of product with FSC certification. The main problem is the difficulty in the purchase of raw material (falca) from a certified source (verifiable). Due to the specificity of the type of commerce and seasonality of this raw material, involving intermediaries (falqueiros – who commercialize falcas), these suppliers are unable to demonstrate that cork thus provided comes from oak forests/ properties with FSC certification, interrupting like this the chain of custody of the process of certification. Considering these facts, we propose the possibility of introducing plans/procedures of exception regarding the requirements of FSC-STD-40-004 standard, and therefore simplify some bureaucratic procedures concerning the commercialization of this specific material (falca – virgin cork).</p>	<p>We suggest the following amendments:</p> <ol style="list-style-type: none"> <li>1) In the requirements and percentage limits needed for the use of the FSC logo on the product, in the 'FSC Mix' rating, we propose to reduce the current rate of exigency «at least 70%» and instead establish as limit «at least 20%». Argument: difficulty in purchasing falca issued from certified properties (forests with sustainable management) in significant quantity (only about 15% of the cork oak forest has FSC certification) ;</li> <li>2) Measure the possibility of creating an attachment /addendum to the FSC standard, or even a specific standard, targeted to the requirements involving this type of product / raw material (forest source) that considers the constraints of the certification chain control, and takes into attention the scarcity and reduced quantity of cork oak forest certified. Argument: inexistence of a framework accepting falca in the universe of natural cork woods and of the actors involved, which imply a break in the certification chain of custody the decrease in the current form.</li> <li>3) We know that falca is mainly the result of the pruning of trees'branches or a product of the harvest of dried trees. In this mix of wood / cork extracted from the cork oak trees, after the separation, cork represents 25% of the weight and wood/firewood represents 75%. Taking this in attention, the standard should consider as a valid evidence the invoice of an intermediary (falqueiro) for the purchase of this</li> </ol>

			<p>mixture of cork / and wood to a forest's owners with certified cork oak forests, in order that the invoice gives guarantee to the intermediary who supplied the cork industry with falca, (provided that the percentage is up to 25% of the total weight of purchase mix (properly documented)).</p>
11.1.1	T	<p>Proposal for amendment procedures in FSC certification – Chain of Custody chain, applicable to the industrial process (production of expanded agglomerated cork), and the whole concerned chain. The main objective of this proposal is related to the purpose of presenting the underlying difficulties of this industry to maintain and expand the quantity of product with FSC certification. The main problem is the difficulty in the purchase of raw material (falca) from a certified source (verifiable). Due to the specificity of the type of commerce and seasonality of this raw material, involving intermediaries (falqueiros – who commercialize falcas), these suppliers are unable to demonstrate that cork thus provided comes from oak forests/ properties with FSC certification, interrupting like this the chain of custody of the process of certification. Considering these facts, we propose the possibility of introducing plans/procedures of exception regarding the requirements of FSC-STD-40-004 standard, and therefore simplify some bureaucratic procedures concerning the commercialization of this specific material (falca – virgin cork).</p>	<p>We suggest the following amendments:</p> <ol style="list-style-type: none"> <li>1) In the requirements and percentage limits needed for the use of the FSC logo on the product, in the 'FSC Mix' rating, we propose to reduce the current rate of exigency «at least 70%» and instead establish as limit «at least 20%». Argument: difficulty in purchasing falca issued from certified properties (forests with sustainable management) in significant quantity (only about 15% of the cork oak forest has FSC certification) ;</li> <li>2) Measure the possibility of creating an attachment /addendum to the FSC standard, or even a specific standard, targeted to the requirements involving this type of product / raw material (forest source) that considers the constraints of the certification chain control, and takes into attention the scarcity and reduced quantity of cork oak forest certified. Argument: inexistence of a framework accepting falca in the universe of natural cork woods and of the actors involved, which imply a break in the certification chain of custody the decrease in the current form.</li> <li>3) We know that falca is mainly the result of the pruning of trees' branches or a product of the harvest of dried trees. In this mix of wood / cork extracted from the cork oak trees, after the separation, cork represents 25% of the weight and wood/firewood represents 75%.</li> </ol>

			<p>Taking this in attention, the standard should consider as a valid evidence the invoice of an intermediary (falqueiro) for the purchase of this mixture of cork / and wood to a forest's owners with certified cork oak forests, in order that the invoice gives guarantee to the intermediary who supplied the cork industry with falca, (provided that the percentage is up to 25% of the total weight of purchase mix (properly documented).</p>
11.1.1	G	<p>It needs to be added that you may not outsource to companies that have been disassociated from the FSC system. This has taken place in some instances, which is frankly inconsistent and jeopardises the image of the FSC system.</p>	<p>Specify that outsourcing to disassociated companies shall not be allowed.</p>
11.1.1 and 11.1.5	T	<p>COC is not relevant for companies which are not involved in any processing or transformation of certified products (e. g. storage, distribution, logistics). So it should be clarified that outsourcing to these companies is also not relevant.</p>	<p>Clarify in 11.1.1 that contractors employed for services that do not involve manufacture or transformation of certified products (e.g. warehousing, storage, distribution, logistics) are not relevant. Delete Note 3 d) below 11.1.5</p>
11.1.2	G/T	<p>This requirement is against the legal protection of data privacy. This is neither just and reasonable nor feasible. This paragraph obviously is a back door for FSC-OCP.</p>	<p>Rephrase: "If the organization outsource activities to an FSC certified contractor, the organization shall verify the scope and validity of the contractor's certificate to ensure that the activities are covered under the scope of a valid certificate. <b>This shall be done either through the FSC database at <a href="http://info.fsc.org">info.fsc.org</a> or the FSC Online Claims Platform at <a href="http://ocp.fsc.org">ocp.fsc.org</a>"</b> (Remove the red text)</p>
11.1.2	T	<p>11.1.2/5 Another wordy narrative about outsourcing agreements, which seems to indicate that they should now be incorporated in the certification. Why?</p>	<p>Outsource agreements, may be short/long term, cancelled increased or decreased. The amount of admin to keep the certification is just more work for the CHs, and time wasted in liaison with the CBs, and should be left as in the current standard.</p>
11.1.2	G	<p>As the questions and criticisms about the OCP are not cleared yet, the OCP should not find mention in the new standard.</p>	<p>Delete the OCP</p>



11.1.2	G/T	<p>“If the organization outsource activities to an FSC certified contractor, the organization shall verify the scope and validity of the contractor’s certificate to ensure that the activities are covered under the scope of a valid certificate. This shall be done either through the FSC database at info.fsc.org or the FSC Online Claims Platform at ocp.fsc.org”</p> <p>This requirement is against the legal protection of data privacy. This is neither just and reasonable nor feasible. This paragraph obviously is a back door for FSC-OCP.</p>	<p>Rephrase: (remove red text)          “If the organization outsource activities to an FSC certified contractor, the organization shall verify the scope and validity of the contractor’s certificate to ensure that the activities are covered under the scope of a valid certificate. <b>This shall be done either through the FSC database at info.fsc.org or the FSC Online Claims Platform at ocp.fsc.org</b>”</p>
11.1.2	G/T	<p>“If the organization outsource activities to an FSC certified contractor, the organization shall verify the scope and validity of the contractor’s certificate to ensure that the activities are covered under the scope of a valid certificate. This shall be done either through the FSC database at info.fsc.org or the FSC Online Claims Platform at ocp.fsc.org”</p> <p>This requirement is against the legal protection of data privacy. This is neither just and reasonable nor feasible. This paragraph obviously is a back door for FSC-OCP.</p>	<p>Rephrase: (remove red text)          “If the organization outsource activities to an FSC certified contractor, the organization shall verify the scope and validity of the contractor’s certificate to ensure that the activities are covered under the scope of a valid certificate. <b>This shall be done either through the FSC database at info.fsc.org or the FSC Online Claims Platform at ocp.fsc.org</b>”</p>
11.1.2	G	Directing organizations to verify the status of certificates in two different sources can lend confusion.	Remove reference to the voluntary Online Claims Platform and direct all verification of certificates to the FSC Database.
11.1.2	G/T	<p>“If the organization outsource activities to an FSC certified contractor, the organization shall verify the scope and validity of the contractor’s certificate to ensure that the activities are covered under the scope of a valid certificate. This shall be done either through the FSC database at info.fsc.org or the FSC Online Claims Platform at ocp.fsc.org”</p> <p>This requirement is against the legal protection of data privacy. This is neither just and reasonable nor feasible. This paragraph obviously is a back door for FSC-OCP.</p>	<p>Rephrase: (remove red text)          “If the organization outsource activities to an FSC certified contractor, the organization shall verify the scope and validity of the contractor’s certificate to ensure that the activities are covered under the scope of a valid certificate. <b>This shall be done either through the FSC database at info.fsc.org or the FSC Online Claims Platform at ocp.fsc.org</b>”</p>
11.1.2	E	“If the organization outsource activities . . .”	Grammar: “outsources”
11.1.2	G/T	<p>“If the organization outsource activities to an FSC certified contractor, the organization shall verify the scope and validity of the contractor’s certificate to ensure that the activities are covered under the scope of a valid certificate. This shall be done either through the FSC database at info.fsc.org or the FSC Online Claims Platform at ocp.fsc.org”</p> <p>This requirement is against the legal protection of data privacy. This is neither just and reasonable nor feasible. This paragraph obviously is a back door for FSC-OCP.</p>	<p>Rephrase: (remove red text)          “If the organization outsource activities to an FSC certified contractor, the organization shall verify the scope and validity of the contractor’s certificate to ensure that the activities are covered under the scope of a valid certificate. <b>This shall be done either through the FSC database at info.fsc.org or the FSC Online Claims Platform at ocp.fsc.org</b>”</p>

11.1.2	G/T	<p>“If the organization outsource activities to an FSC certified contractor, the organization shall verify the scope and validity of the contractor’s certificate to ensure that the activities are covered under the scope of a valid certificate. This shall be done either through the FSC database at info.fsc.org or the FSC Online Claims Platform at ocp.fsc.org”</p> <p>This requirement is against the legal protection of data privacy. This is neither just and reasonable nor feasible. This paragraph obviously is a back door for FSC-OCP.</p>	<p>Rephrase: (remove red text)          “If the organization outsource activities to an FSC certified contractor, the organization shall verify the scope and validity of the contractor’s certificate to ensure that the activities are covered under the scope of a valid certificate. <b>This shall be done either through the FSC database at info.fsc.org or the FSC Online Claims Platform at ocp.fsc.org</b>”</p>
11.1.2	G/T	<p>“If the organization outsource activities to an FSC certified contractor, the organization shall verify the scope and validity of the contractor’s certificate to ensure that the activities are covered under the scope of a valid certificate. This shall be done either through the FSC database at info.fsc.org or the FSC Online Claims Platform at ocp.fsc.org”</p> <p>This requirement is against the legal protection of data privacy. This is neither just and reasonable nor feasible. This paragraph obviously is a back door for FSC-OCP.</p>	<p>Rephrase: (remove red text)          “If the organization outsource activities to an FSC certified contractor, the organization shall verify the scope and validity of the contractor’s certificate to ensure that the activities are covered under the scope of a valid certificate. <b>This shall be done either through the FSC database at info.fsc.org or the FSC Online Claims Platform at ocp.fsc.org</b>”</p>
11.1.2/5	T	<p>Another wordy narrative about outsourcing agreements, which seems to indicate that they should now be incorporated in the certification. Why?</p>	<p>Outsource agreements, may be short/long term, cancelled increased or decreased. The amount of admin to keep the certification is just more work for the CHs, and time wasted in liaison with the CBs, and should be left as in the current standard.</p>
11.1.3	G	<p>The clause here adds in the requirement for certificate holders to inform their certification body not just who they are outsourcing to, but also the "outsourced activity". It is unclear at this time what the impacts are of this additional requirement, however, there are some concerns that this may be interpreted differently by certificate holders and certification bodies leading to unequal implementation. Perhaps the term "outsourced activity" should be clarified.</p>	<p>Discuss the necessity to clarify the term “outsourced activity”</p>
11.1.3	T	<p>There are different approaches from different CBs on if the organisation is allow to start outsourcing to high risk contractors immediately after informing of the addition. Some CBs requires scope expansion audit before this high risk contractor can be used. Some do not. FSC's position on this must be made clear.</p>	<p>Provide a guidance through this standard (for CHs) and also through accreditation standard.</p>
11.1.4	G	<p>Suggest requiring that subcontractor certificate codes be included for ease of verification.</p>	<p>Revise requirement to: “The organization shall maintain a record with the names, certification status, certificate codes (where applicable), and contact details of all contractors.</p>
11.1.4	G/T	<p>It is not necessary to maintain a record of all contractors that are not involved in the production of FSC-certified materials.</p>	<p>Rephrase:          The organization shall record the names and contact details of all contractors used for the processing or production of FSC-certified materials.</p>
11.1.4		<p>It is not necessary to maintain a record of all contractors that are not involved in the production of FSC-certified materials.</p>	<p>Rephrase:          The organization shall record the names and contact details of all contractors used for the processing or production of FSC-certified materials.</p>
11.1.4	T	<p>There will be specific risks depending on the outsourced activities</p>	<p>11.1.4 The organization shall maintain a record with the names,</p>

			certification status and validity, contact and outsourced activities details of all contractors.
11.1.4		It is not relevant to verify all the information stated in this indicator that are not involved in the production of non-certified products.	Maintain the actual wording of this item: 11.1.4. The organization shall record the names and contact details of all contractors used for the processing or production of FSC-certified materials
11.1.4		It is not relevant to verify all the information stated in this indicator that are not involved in the production of non-certified products.	Maintain the actual wording of this item: 11.1.4. The organization shall record the names and contact details of all contractors used for the processing or production of FSC-certified materials.
11.1.4		It is not necessary to maintain a record of all contractors that are not involved in the production of FSC-certified materials.	Rephrase: The organization shall record the names and contact details of all contractors used for the processing or production of FSC-certified materials.
11.1.4		It is not necessary to maintain a record of all contractors that are not involved in the production of FSC-certified materials.	Rephrase: The organization shall record the names and contact details of all contractors used for the processing or production of FSC-certified materials.
11.1.4	E	Not clear what exactly is required under "certification status".	We would suggest to list exact data, which shall to be recorded.
11.1.4		It is not necessary to maintain a record of all contractors that are not involved in the production of FSC-certified materials.	Rephrase: The organization shall record the names and contact details of all contractors used for the processing or production of FSC- certified materials.
11.1.4		It is not necessary to maintain a record of all contractors that are not involved in the production of FSC-certified materials.	Rephrase: The organization shall record the names and contact details of all contractors used for the processing or production of FSC- certified materials.
11.1.4		It is not necessary to maintain a record of all contractors that are not involved in the production of FSC-certified materials.	Rephrase: The organization shall record the names and contact details of all contractors used for the processing or production of FSC- certified materials.
11.1.5	T	Note3: even one more or more of the high risk indicators apply, the certification body can downgrades the risk to "low" if any of the following indicators apply: d) the contractor is employed for services that do not involve manufacture and transformation (warehousing, storage, distribution and logistics).	Can you specify if the organization shall establish an outsourcing agreement with a contractor is employed for service as described in the point d)
11.1.5	T, E	NOTE 1, NOTE 2 and NOTE 3 are instructions to CB's and do not belong in this standard.	

11.1.5	T	Note 3 d should be placed earlier in the text to divide logistics' services from the regulations and to clarify that those do not underlie the regulations.	Note 3d placed earlier in the scope of chapter 11
11.1.5	T	NOTE 1, NOTE 2 and NOTE 3 are instructions to CB's and do not belong in this standard.	
11.1.5	G	The proposed revision here appears to remove the need for outsourcing requirements between certified companies altogether. If this is the case, this should be more clearly stated in the standard. Additionally, the current standard gives more flexibility for contractors to create their own control process (12.1.1.c-d) than the proposed change seems to do. More clarification is needed in the draft clause 11.1.5a as it is not clear whether it will be required that the contractor use the contracting organization's system of tracking, or whether it requires the contracting organization to explicitly outline in their procedures what system the contractors must use.	Provide more clarity in the proposed revision and more clearly state the intention.
11.1.5	G	The standard should make clear, that forest contractors are not within the scope of the provisions for "Outsourcing to contractors". According to 11.1.5 Note 3 c) the high risk status can be downgraded in case there is no risk of contamination, as there is none for foresters working in a fsc certified forest.	
11.1.5	G	The standard should make clear, that forest contractors are not within the scope of the provisions for "Outsourcing to contractors". According to 11.1.5 Note 3 c) the high risk status can be downgraded in case there is no risk of contamination, as there is none for foresters working in a fsc certified forest.	
11.1.5	G	The standard should make clear, that forest contractors are not within the scope of the provisions for "Outsourcing to contractors". According to 11.1.5 Note 3 c) the high risk status can be downgraded in case there is no risk of contamination, as there is none for foresters working in a fsc certified forest.	
11.1.5	G	Physical inspection at High risk outsourcing activity:	If the contractor is FSC certified the CB or organization should not have to perform physical inspection. Otherwise certified contractors lose their incentive to be certified
11.1.5	G	Physical inspection at High risk outsourcing activity:	If the contractor is FSC certified the CB or organization should not have to perform physical inspection. Otherwise certified contractors lose their incentive to be certified.
11.1.5	G	The standard should make clear, that forest contractors are not within the scope of the provisions for "Outsourcing to contractors". According to 11.1.5 Note 3 c) the high risk status can be downgraded in case there is no risk of contamination, as there is none for foresters working in a fsc certified forest.	
11.1.5	G	The standard should make clear, that forest contractors are not within the scope of the provisions for "Outsourcing to contractors". According to 11.1.5 Note 3 c) the high risk status can be downgraded in case there is no risk of contamination, as there is none for foresters working in a fsc certified forest.	
11.1.5 b)	T	Some certified organisations ask their contractors to include the organisation's CoC code for item identification reason so that it's clear the items are of the organization.	b)Not use the FSC trademarks for promotional use or use the organization's certificate code on sales and transport documents unless specifically asked by the organization to include its certification code on these documents;

11.1.5 b)	T	For example, subcontractors should continue being allowed to print invoices with the organisation's certificate number. Otherwise there is contradiction with the note of 11.1.7	Not use the FSC trademarks for promotional use or use the organization's certificate code on sales and transport documents, except if this activity is included in the outsourcing agreement
11.1.5 Note 1	E	We have concerns about adding this into the COC standard as it appears to move the onus of checking the CPI from the certification body to the certificate holder. It's unclear what the benefit is to including it in both the 20-011 and 40-004. While it may be beneficial for the certificate holder to know that they are being judged against that metric, it doesn't seem like we want to take outsourcing to this next level. Additionally, there are many places in 20-011 that affect the auditing of the certificate - such as sampling procedures for multi-sites - and these are not included in any certification standard.	FSC standards need to remain consistent about where these clauses reside depending on where they are most applicable. In this case it seems most applicable to certification bodies, and the metrics here should be removed.
11.1.5 Note 1 & 2	G	There is some concern about adding this into the COC standard as it appears to move the onus of checking the CPI from the certification body to the certificate holder. It's unclear what the benefit is to including it in both the 20-011 and 40-004. While it may be beneficial for the certificate holder to know that they are being judged against that metric, it doesn't seem like we want to take outsourcing to this next level. Additionally, there are many places in 20-011 that effect the auditing of the certificate - such as sampling procedures for multi-sites - and these are not included in any certification standard. The standards should remain consistent about where these clauses reside depending on where they are most applicable. In this case it seems most applicable to certification bodies, and the metrics here should be removed.	
11.1.5 Note 1 c)	T	It should be made clear that it is talking about mixing of different "material categories"	c) The contractor mixes input materials of different material categories (e.g. FSC 100% and Controlled Wood);
11.1.5 NOTE 1,e	T	Some CHs have limited space for on-site storage and contract at least some warehousing and shipping work. Requiring that the product be shipped back to the CH and then re-shipped is costly, ineffective, and wastes energy resources. This requirement has both a negative economic and environmental impact. As long as the contractor is effectively controlled, and does nothing but store and ship, this should not be an indicator of high-risk. The high-risk determination results in increased auditing costs and for no significant benefit. "For high risk outsourcing, the certification body undertakes a physical inspection of a sample of contractors as part of the organization's evaluation.... Outsourcing shall be classified as 'high risk' if any of the following indicators apply: e) The contractor does not physically return the products to the organization;"	Exempt outsourced warehousing from being declared high-risk due to the 11.1.5 NOTE when CHs can demonstrate that shipping to customers directly from the warehouse is effectively controlled.
11.1.5 Note 3	G	The change here is confusing as it seems to contradict the above clauses where the above removes the need to include outsourcing in the scope, and now here inclusion in scope is referenced and it sets a higher bar than just part of the CoC system. Additionally, this information is applicable to certification bodies (20-011), and the metrics here should be removed.	
11.1.5 Note 3 c	E	"contamination" The word contamination is misleading. When handling wood based products the word contamination is often used for issues around radioactivity, hazardous organisms, pesticides etc.	Find an alternative word for contamination
11.1.5 Note 3c	E	"contamination" When handling wood based products the word contamination is often used for issues around radioactivity, hazardous organisms, pesticides etc.	If possible, find an alternative word for contamination

11.1.5.a	T	In this clause the term applicable is used without specifying which requirements and procedures. This will lead to different interpretations of this requirement.	Specify which requirements and procedures.
11.1.5.b	T	For example, subcontractors should continue being allowed to print invoices with the organisation's certificate number. Otherwise there is contradiction with the note of 11.1.7	Not use the FSC trademarks for promotional use or use the organization's certificate code on sales and transport documents, except if this activity is included in the outsourcing agreement
11.1.5b)	T	For example, subcontractors should continue being allowed to print invoices with the organisation's certificate number. Otherwise there is contradiction with the note of 11.1.7	Not use the FSC trademarks for promotional use or use the organization's certificate code on sales and transport documents, except if this activity is included in the outsourcing agreement
11.1.5b)	T	For example, subcontractors should continue being allowed to print invoices with the organisation's certificate number. Otherwise there is contradiction with the note of 11.1.7	Not use the FSC trademarks for promotional use or use the organization's certificate code on sales and transport documents, except if this activity is included in the outsourcing agreement
11.1.5b)	T	For example, subcontractors should continue being allowed to print invoices with the organisation's certificate number. Otherwise there is contradiction with the note of 11.1.7	Not use the FSC trademarks for promotional use or use the organization's certificate code on sales and transport documents, except if this activity is included in the outsourcing agreement
11.1.6	G		b) The organisation or the contractor keeps records of inputs, outputs, and delivery documentation associated with all FSC certified material which is processed or produced under the outsourcing contract or agreement.
11.1.6	G		b) The organisation or the contractor keeps records of inputs, outputs, and delivery documentation associated with all FSC certified material which is processed or produced under the outsourcing contract or agreement.
11.1.6	G	It is not clear why the management system shall be shared with the contractor. The contractor should implement an own management system to meet the FSC requirements.  To share documented procedures seems to be redundant as long as the relevant steps, procedures and requirements are listed and described at the outsourcing agreement.  It is in everybody's interest to avoid redundant descriptions of management systems and procedures. Therefore, the FSC standard should focus only on relevant requirements and match clauses if it's possible. Otherwise the requirements and the handling of FSC standard becomes too bureaucratic.	Please clarify this clause and delete the aspects about sharing the management system.
11.1.6	G	In the case of work outsourced on site under the supervision of the organization, b) should not be required. For example a contractor hired to operate fork lifts on site to handle paper rolls is not a process or producing FSC-certified material, and should not require keeping records of inputs and outputs. Delivery documents may be non-applicable in many cases. To require that duplicate records be kept is totally impractical.	
11.1.6	G		b) The organisation or the contractor keeps records of inputs, outputs, and delivery documentation associated

			with all FSC certified material which is processed or produced under the outsourcing contract or agreement.
11.1.6	E	Delivery documentation should be Delivery document to be consistent with terms and definitions.	
11.1.6	g	Not result based	Look for result based not dictate how
11.1.6	G		b) The organisation <b>or the contractor</b> keeps records of inputs, outputs, and delivery documentation associated with all FSC certified material which is processed or produced under the outsourcing contract or agreement.
11.1.6	G	It is not clear why the management system shall be shared with the contractor. The contractor should implement an own management system to meet the FSC requirements. To share documented procedures seems to be redundant as long as the relevant steps, procedures and requirements are listed and described at the outsourcing agreement. It is in everybody's interest to avoid redundant descriptions of management systems and procedures. Therefore, the FSC standard should focus only on relevant requirements and match clauses if it's possible. Otherwise the requirements and the handling of FSC standard becomes too bureaucratic.	Please clarify this clause and delete the aspects about sharing the management system.
11.1.6 b)	T	outsourcing contract or agreement should be outsourcing agreement in order to be consistent with other parts of the standard.	Remove "contract".
11.1.6 b)	G		b) The organisation or the contractor keeps records of inputs, outputs, and delivery documentation associated with all FSC certified material which is processed or produced under the outsourcing contract or agreement.
11.1.8	E	The whole section 11.1.8 could potentially be removed as it is somewhat a no-brainer	Remove
11.2.0	G	The inclusion of requirements for contractors is appreciated, as this has been a clear gap in systems.	None
11.2.1	G	The current rules require only the contracting organization to inform their certification body about their outsourcing, however, here there appear to be increasing requirements as the contractors (if FSC certified) would also need to inform their own certification bodies. Given the general lessening of requirements in outsourcing between two certified organizations, it may not be necessary that both parties inform their certification bodies. Additionally, there are concerns that this additional requirement for including outsourcing in the scope may lead to higher audit costs for those who are using certified organizations.	
11.2.1	T	It's not possible to inform the certification organisation for every single outsourcing.	Delete
11.2.1	T	The intention of this requirement is not clear. If this is about implementing outsources activities for certificate holders, then requirements in 11.1 ensures that outsourced activities are done in an appropriate way so 11.2.1 is not needed. If this is about implementing outsourced activities for non-certificate holder, then it should be clear in the text.	
11.2.1	E/T	It is not clear to whom 11.2.1 applies.	Clarify the new requirement 11.2.1, especially to whom it applies.
11.2.1	E	Parts of 11.2.1 and 11.1.3 are partly redundant and could be merged.	Merge or partially remove redundant information.

11.2.1	G	<p>What is the purpose of this new requirement? The intent of this section is very unclear.</p> <p>If a company holds a CoC certificate, they will be following their own system, not that of a client, which is using them as an Outsource Facility.</p> <p>Only when an Outsource Facility is NOT certified, do they follow a client's procedures.</p>	Clarify this entire section.
11.2.2	G/T	<p>It is not always possible to fulfill the requirement. Because the contracting organization does not want to know its supplier whether if or even whom is processing for him.</p>	<p>"The organization may provide outsourcing services to non-certified contracting organizations. If the contracting organization buys FSC certified input materials, these materials shall be shipped directly from an FSC certified supplier to the certified contractor or at least be kept physically separate for preparing the ongoing transport (i.e. the non-certified contracting organizations shall not take physical possession of the materials before outsourcing)."</p>
11.2.2	T	<p>Now this clause only defines the organization is allowed to provide outsourcing services (to non-certified contracting organizations). According to the ADVICE-40-004-01 this clause should clarify the conditions when the product is produced and/or labeled as FSC certified</p>	<p>Add: under the scope of its chain of custody for the purpose of producing and of labeling FSC certified products.</p> <p>The organization may provide outsourcing services to non-certified contracting organizations <b>under the scope of its chain of custody for the purpose of producing and of labeling FSC certified products.</b> If the contracting organization buys FSC certified input materials, these materials shall be shipped directly from an FSC certified supplier to the certified contractor (i.e. the non-certified contracting organizations shall not take physical possession of the materials before outsourcing).</p>
11.2.2		<p>It is not always possible to fulfill the requirement:</p> <p>"The organization may provide outsourcing services to non-certified contracting organizations. If the contracting organization buys FSC certified input materials, these materials shall be shipped directly from an FSC certified supplier to the certified contractor (i.e. the non-certified contracting organizations shall not take physical possession of the materials before outsourcing)."</p> <p>Because the contracting organization does not want to know its supplier whether if or even whom is processing for him.</p>	<p>"The organization may provide outsourcing services to non-certified contracting organizations. If the contracting organization buys FSC certified input materials, these materials shall be shipped directly from an FSC certified supplier to the certified contractor or at least be kept physically separate for preparing the ongoing transport (i.e. the non-certified contracting organizations shall not take physical possession of the materials before outsourcing)."</p>
11.2.2		<p>It is not always possible to fulfill the requirement:</p> <p>"The organization may provide outsourcing services to non-certified contracting organizations. If the contracting organization buys FSC certified input materials, these materials shall be shipped directly from an FSC certified supplier to the certified contractor (i.e. the non-certified contracting organizations shall not take physical possession of the materials before outsourcing)."</p> <p>Because the contracting organization does not want to know its supplier whether if or even whom is processing for him.</p>	<p>"The organization may provide outsourcing services to non-certified contracting organizations. If the contracting organization buys FSC certified input materials, these materials shall be shipped directly from an FSC certified supplier to the certified contractor or at least be kept physically separate for preparing the ongoing transport (i.e. the non-certified contracting organizations shall not take physical possession of the materials before outsourcing)."</p>



			shall not take physical possession of the materials before outsourcing).”
11.2.2	G	The similar requirement is defined in the current ADVICE-40-004-01 of DIR 40-004, however, detailed requirements defined in ADVICE-40-004-01 are not included in the draft of the standard. Advantages and risk of removing those requirements should be examined with caution.	N/A
11.2.2		It is not always possible to fulfill the requirement: “The organization may provide outsourcing services to non-certified contracting organizations. If the contracting organization buys FSC certified input materials, these materials shall be shipped directly from an FSC certified supplier to the certified contractor (i.e. the non-certified contracting organizations shall not take physical possession of the materials before outsourcing).” Because the contracting organization does not want to know its supplier whether if or even whom is processing for him.	“The organization may provide outsourcing services to non-certified contracting organizations. If the contracting organization buys FSC certified input materials, these materials shall be shipped directly from an FSC certified supplier to the certified contractor or at least be kept physically separate for preparing the ongoing transport (i.e. the non-certified contracting organizations shall not take physical possession of the materials before outsourcing).”
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12.0 Compliance with timber legality systems	T	The requirements for Timber legality legislations have been added to the FSC Chain of Custody system due to legislation timelines, and therefore have not adequately been adopted by Certificate Holders, evaluated by CBs, or ensured by Accreditation Bodies. It is because of this, that the next version of the accreditation standard clearly outlines CB responsibilities in auditing companies to these requirements. Failure to do so leaves gaps in the FSC system regarding legality.	FSC shall develop CB tools, guidance and requirements for implementing the Timber Legality Legislation requirements of the Chain of Custody standard to ensure proper implementation.
12.0 Compliance with timber legality systems	G and T	Organizations that go through a verification of their DDS through other means should be able to meet section 12 requirements by providing this verification previously audited. This will ease systems for organizations that already pay for and complete this service within other arenas.	
12.0 Compliance with timber legality systems	G	Why is it a requirement of the FSC Chain of Custody standard to tell organisations how they should comply with external legislation? Compliance with legislation is a basic requirement of the Policy of Association. This section is poorly written and exposes FSC to unnecessary risk by being overly prescriptive.	Delete entirety of 12
12.0.0	E/T	12.2 says “if required by applicable legislations” and 12.1 ensures compliance with legislation. So 12.2. is not necessary. Same with 12.3 which is part of the law. It is more confusing for companies that are not affected by the law and unnecessary for companies that have to comply to the law anyway (beside certification).	Add “timber legality legislations” to 12.1 and delete 12.2. and 12.3
12.1.1	E	Not everything in the list is always necessary to proof that the organisation complies with the trade and custom laws.	Add: can Organizations exporting and/or importing timber or timber products shall have a system in place to ensure that the commercialization of FSC certified products complies with all applicable trade and custom laws, which can include, but are not necessarily limited to:
12.1.1	T	Legal compliance is a general requirement	
12.1.1	T	This requirement is applying to companies exporting and/or importing timber but only export complying documents are listed.	Please add examples of import documents that can show compliance with trade and custom laws or change the wording if the current examples also are examples of this. And please add the option of referring to national laws regulating this and existing internal procedures that must ensure commercialisation of products in line with custom and trade laws.

12.1.1	E	<p>The part “all applicable trade and custom laws” is being interpreted in MANY ways among CB and CHs. I wrote this to John last year, he discussed it in the EUTR group at FSC IC and came back with an answer that indicated that you would remove the unclarity. I don’t like this is done it the current CoC draft, so I repeat my thoughts from last year here:</p> <p>Dear Lucia, Achim and John,</p> <p>During the last weeks we have received questions from Danish CoC importing companies regarding the advice note 40-004-11 Trade and Custom Laws:</p> <p>FSC certificate holders exporting and/or importing timber or timber products shall have procedures in place to ensure that the commercialization of FSC certified products comply with all applicable trade and custom laws.</p> <p>There is some confusion on what is expected from the companies. For instance: Do they have to have procedures to ensure that their supplier is complying with applicable laws in supplier country or is it only these laws in the importers country that the procedure should cover (I guess this is the way to understand it because of the word "applicable" which relates to the specific area in which importer or exporter operate) ?</p> <p>It seems to me, that this advice note could be misinterpreted as a company have received feedback from a CB indicating, that the procedure must also cover laws in the country where the supplier operate.</p>	<p>I propose, so we make sure that it is interpreted correct, that you in some way make it more clear in the advice note that an individual CoC certified company only has to have procedures in place to ensure compliance with the trade and customs legislation related to their own import (or export). Further explaining that ensuring compliance with the trade and customs legislation of the country of origin, as required in the EUTR context, will be addressed by the COC certified companies further down the supply chain.</p>
12.1.1	G	<p>We don’t understand why this requirement applies for all cases of export and import at such, when the EUTR requirement on refers exclusively to compliance with the laws and regulations in countries where timber has been harvested covering the export of timber and timber products.</p>	<p>Unless this is caused by other timber legislations we propose rephrase to: “Organizations exporting timber or timber products from the country of harvest shall...”. NOTE: The FSC EUTR Guidance includes the same approach and this does not make sense when the EUTR requirement is different and not related to Lacey act or other legislations...</p>
12.1.1	G	<p>Legality is a general requirement in global trading, as customers will demand rather earlier for proof of different wood species. This section is not necessary.</p>	<p>Delete this section.</p>
12.1.1	T	<p>List omits</p>	<p>Add ‘phytosanitary certificates;’</p>
12.1.1	T	<p>Legal compliance is a general requirement.</p>	<p>12.1.1 should be deleted</p>
12.1.1	G	<p>The requirement to ensure products purchased as FSC certified makes no sense. The whole point of buying an FSC certified product in the first place is because you can be assured that the legal requirements have been met and that there are checks and balances in place to assure customers (3rd party verification).</p>	
12.1.1	T	<p>Clarify the statement “Upon request and if required by applicable timber legality legislations..... Does this mean certificate holders must only supply the species and origin of the timber when required by Timber laws?</p>	

12.1.1.	E	<p>Lets take the opportunity to improve the text of what comes from the relevant Advice Note. It now can be read as if an importing/exporting company is required to check the legality of the entire supply chain (“the commercialization of FSC certified products”), and on the other hand it is rather indirect in saying “have a system in place”</p> <p>The more direct formulation I propose is also in line with the last line of 12.2.1. where “proof of compliance” is asked for, not proof of having procedures in place.</p>	<p>“Organizations exporting and/or importing timber or timber products shall ensure compliance with all applicable trade and customs laws, which include, but are not necessarily limited to:”</p>
12.2.1	T	<p>This is the appropriate place for the requirements regarding species and country of harvest. The draft language also makes it clear that it only needs to be shared upon request.</p>	<p>Keep wording and see comments for 5.1.1</p> <p>In the draft document, country of harvest requirements have been added to sections 2.2.3, 5.1.1, and 12.2.1.</p> <p>5.1.1.g is confusing regarding the expectations in maintaining these lists, how and when this information is recorded, and what is required for a material accounting record. The intention of the requirement for a material accounting record is clear in the existing standard (V2.1), but the intention is not as clear in the draft language (V3).</p> <p>In our opinion, material accounting is for incoming loads of fiber and this requirement could be interpreted that each incoming load would need a species list and accompanying country or origin. While the hardwood/pine designation is easy to make, for companies like ours that use wood chipped in the woods, it would be impossible to have a designated species list at the load or even the batch level. We can only maintain a list of all possible species, which has been acceptable under the requirements of the EUTR.</p> <p>If this requirement does apply to incoming documentation, it is unclear if the receiving company would be in conformance if deliveries did not have this accompanying information. The draft 3.2.1 requirement states, "The organization shall have a system in place to confirm that the quantities and FSC claims of the materials received as input for FSC product groups are accurately documented in the purchase and transport documentation from the supplier." Therefore, this may make it extremely difficult for companies to comply.</p> <p>We do feel species lists are appropriately referenced in 2.2.3e (product group list) and 12.2.1</p>

			(Timber Legality Compliance), and so it is unclear why it is also included in 5.1.1.
12.2.1	T	New regulations will deprive companies from the chance to force suppliers to share information about wood species	Upon request or if required by applicable timber legality legislations, the organization shall provide customers with the following information about FSC certified and FSC Controlled Wood products
12.2.1	G	According to EUTR (article 6b) due diligence shall contain different elements including risk assessment of supply chain. It means, company shall have data about the supply chain, however CoC standard does not require to submit data about the supply chain.	We would suggest to include requirements related to the supply chain.
12.2.1	G	Compliance to EUTR is essential to our business. We highly encourage that the FSC standards are organized to easily map compliance to the EUTR and demonstrate superior compliance.	Fully supportive of continued work.
12.2.1.	E	Has it been considered to remove “and if required by applicable timber legality legislations”? We are already faced with “traders” inside the EU who would like to have that information, for reasons of communication with their clients, whereby operators refuse. The current formulation gives these operators the right to refuse indeed, as passing on such information is not required by the EUTR.	
12.2.1. c)	T,E	Proofing compliance with relevant trade and customs laws asked by the customer can mean a huge bureaucracy to the Organization.	Modification (remove red text) c) <b>Proof of compliance with relevant trade and customs laws</b> c) Documents or other information indicating compliance of those timber and timber products with the applicable legislation.
12.2.1. c)	T,E	Proofing compliance with relevant trade and customs laws asked by the customer can mean a huge bureaucracy to the Organization.	Modification (remove red text) c) <b>Proof of compliance with relevant trade and customs laws</b> c) Documents or other information indicating compliance of those timber and timber products with the applicable legislation.

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12.2.1. c)	T,E	UPM considers that Proofing compliance with relevant trade and customs laws asked by the customer would mean unnecessary bureaucracy for the Organization.	Modification (remove red text) c) Proof of compliance with relevant trade and customs laws c) Documents or other information indicating compliance of those timber and timber products with the applicable legislation.
12.2.1. c)	T,E	UPM considers that Proofing compliance with relevant trade and customs laws asked by the customer would mean unnecessary bureaucracy for the Organization.	Modification (remove red text) c) Proof of compliance with relevant trade and customs laws c) Documents or other information indicating compliance of those timber and timber products with the applicable legislation.
12.2.1. c)	T,E	UPM considers that Proofing compliance with relevant trade and customs laws asked by the customer would mean unnecessary bureaucracy for the Organization.	Modification (remove red text) c) Proof of compliance with relevant trade and customs laws c) Documents or other information indicating compliance of those timber and timber products with the applicable legislation.
12.2.1.c	T,E	Proofing compliance with relevant trade and customs laws asked by the customer can mean a huge bureaucracy to the Organization.	Modification (remove red text) c) Proof of compliance with relevant trade and customs laws c) Documents or other information indicating compliance of those timber and timber products with the applicable legislation.
12.2.2	T	Define 'timely response'	
12.2.2.	E	A "timely response" is not specific enough	The organization shall provide a response to information requests specified in Clause 12.2.1 above within the frequency and timelines indicated in the agreement mentioned in 12.2.3
12.2.3	G, E	In the point 12.2.1. it is clearly said that information is given to the customer upon request. However, in this point (12.2.3.) it is said that the form and frequency of providing information may be agreed ... The latter one is not needed to supplement point 12.2.1.	Deletion
12.2.3	G, E	In the point 12.2.1. it is clearly said that information is given to the customer upon request. However, in this point (12.2.3.) it is said that the form and frequency of providing information may be agreed ... The latter one is not needed to supplement point 12.2.1.	Deletion

12.2.3	G, E	In the point 12.2.1. it is clearly said that information is given to the customer upon request. However, in this point (12.2.3.) it is said that the form and frequency of providing information may be agreed ... The latter one is not needed to supplement point 12.2.1.	Deletion
12.2.3	G, E	In the point 12.2.1. it is clearly said that information is given to the customer upon request. However, in this point (12.2.3.) it is said that the form and frequency of providing information may be agreed ... The latter one is not needed to supplement point 12.2.1.	Deletion
12.2.3	G, E	In the point 12.2.1. it is clearly said that information is given to the customer upon request. However, in this point (12.2.3.) it is said that the form and frequency of providing information may be agreed ... The latter one is not needed to supplement point 12.2.1.	Deletion
12.2.3	G, E	In the point 12.2.1. it is clearly said that information is given to the customer upon request. However, in this point (12.2.3.) it is said that the form and frequency of providing information may be agreed ... The latter one is not needed to supplement point 12.2.1.	Deletion
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12.3.0	G	<p>CPA has members that are FSC certified producers of a broad line of ready-to-assemble furniture, cabinets, fixtures, etc. Many sell both branded and private labelled products to national and regional retailers such as Walmart, IKEA, Target, Best Buy, and others. Their products are primarily made out of particleboard and medium density fiberboard, and as such, make outstanding use of natural resources when compared to products produced from solid wood or other materials.</p> <p>We fully support the paper's recommendation to give pre-consumer fiber the same recognition that post-consumer fiber is accorded. That is clearly a win-win-win for the FSC, the paper producers, and the environment.</p> <p>Having said that, the FSC should also consider the issues surrounding pre-consumer wood fiber used for composite panels. Major retailers such as Walmart and IKEA are interested in selling FSC certified products but recognize that there is a limited amount of FSC certified forest land available in North America. In fact, if either of these retailers demanded that 100% of their furniture be produced from FSC certified wood, it would consume over 100% of the available FSC credits in the system today. Given the shortage of FSC fiber and the associated price premium for consuming a large quantity of credits of this constrained resource, no major retailer has been willing to take a strong position on using FSC wood for furniture.</p> <p>The FSC identified a number of environmental benefits from utilizing pre-consumer fiber vs. virgin fiber for paper mills. The composite panel industry has the potential to achieve similar benefits. It is environmentally preferable for a panel mill to produce composite panels from pre-consumer wood (sawmill residuals, plywood trim, etc.) than to harvest virgin timber, chip it, dry it, and utilize it in panels. Similar to the case for paper products, enabling panel mills to value pre-consumer wood fiber toward FSC certified panels and wood products would greatly expand the available supply of FSC fiber and would dramatically extend the FSC's reach into furniture, flooring, building products, and a host of other consumer and industrial products.</p> <p>The FSC should recognize pre-consumer fiber used in panel production the same way that it does for pre-consumer fiber in paper production.</p>	Recognize pre-consumer material the same as post-consumer fiber for composite panels

12.3.0	T	Requirements of due diligence for pre-consumer reclaimed wood should be expanded to all timber legality legislations. It has been stated that the US Lacey Act does not require a declaration form, therefore does not require due care. This is debatable as the legislation clearly outlines penalties for lack of due care in sourcing procedures. Pre-consumer materials are not exempt from the requirements of the Act, they are simply exempt from the declaration procedures.	12.3 should be expanded to include all timber legality legislations.  Rainforest Alliance is happy to be a consulted party in such a revision.
12.3.0	G	<p>Sauder is an FSC certified producer of a broad line of ready-to-assemble furniture. We sell both branded and private labeled products to national and regional retailers such as Walmart, IKEA, Target, Best Buy, and others. Our products are primarily made out of particleboard and medium density fiberboard, and as such, make outstanding use of natural resources when compared to products produced from solid wood or other materials.</p> <p>I fully support the paper's recommendation to give pre-consumer fiber the same recognition that post-consumer fiber is accorded. That is clearly a win-win-win for the FSC, the paper producers, and the environment.</p> <p>Having said that, The FSC should also consider the issues surrounding pre-consumer wood fiber used for composite panels. Major retailers such as Walmart and IKEA are interested in selling FSC certified products but recognize that there is a limited amount of FSC certified forest land available in North America. In fact, if either of these retailers demanded that 100% of their furniture be produced from FSC certified wood, it would consume over 100% of the available FSC credits in the system today. Given the shortage of FSC fiber and the associated price premium for consuming a large quantity of credits of this constrained resource, no major retailer has been willing to take a strong position on using FSC wood for furniture.</p> <p>The FSC identified a number of environmental benefits from utilizing pre-consumer fiber vs. virgin fiber for paper mills. The composite panel industry has the potential to achieve similar benefits. It is environmentally preferable for a panel mill to produce composite panels from pre-consumer wood (sawmill residuals, plywood trim, etc.) than to harvest virgin timber, chip it, dry it, and utilize it in panels. Similar to the case for paper products, enabling panel mills to value pre-consumer wood fiber toward FSC certified panels and wood products would greatly expand the available supply of FSC fiber and would dramatically extend the FSC's reach into furniture, flooring, building products, and a host of other consumer and industrial products.</p> <p>The FSC should recognize pre-consumer fiber used in panel production the same way that it does for pre-consumer fiber in paper production.</p>	Recognize pre-consumer material the same as post-consumer fiber for composite panels
12.3.1	T	<p>*How shall the DD be done? How DD will be evaluated? The DDS only appear in FSC-STD-40-005</p>	Include guidelines to the Due diligence process for pre-consumer reclaimed wood
12.3.1	T	<p>This clause is not in line with the EUTR because the way it is written it makes it a requirement of a TRADER to carry out a due diligence risk assessment if the FSC product he places on the market contains pre-consumer reclaimed. It is the OPERATOR who has to carry out the due diligence this is likely to happen way before something becomes pre consumer reclaimed.</p> <p>The point of this clause should be about being aware that pre consumer reclaimed is not recycled and is therefore a product that may need due diligence carried out if the wood that is came from</p>	Text to change as follows 'Organisations placing FSC certified pre-consumer reclaimed wood, whether as part of a product or on its own, on the European market for the first time shall exercise due diligence to ensure that these materials do not contain illegally harvested timber according to regulation No 995/2010



		hasn't already been placed on the market.	(EUTR).'
12.3.1	G	Why would this requirement only apply to the "first" sale into the EU?? The FSC Controlled Wood national initiatives, as well as the Centralized Controlled Wood Risk Assessment will directly address this issue, making this requirement unnecessary, no?? The existing Controlled Wood requirements already address this issue. Why add it here again?	
12.3.1.	E	I can imagine that "placing on the market for the first time" is confusing	"Organizations, when acting as "operators" as defined by the EU Timber Regulation, importing FSC certified products that contain pre-consumer....."
12.3.1.	T	The list of pre-consumer reclaimed wood can be also added by bark and other wooden residues.  Paper scraps are currently not in the scope of the EUTR regulation, but it may change and it is better to foresee this and consider it in the new CoC standard.	To indicate in the NOTE that all wooden residues, which are not classified as waste can be a subject to compliance with the EUTR regulation.  To indicate in the NOTE that as soon as paper scraps get included in the scope of the EUTR they can be considered as compliant to the EUTR
Scope	T	In d) it references to the definition of finished and labelled products according to FSC-STD-50-002 but there is a new definition of finished product proposed in this standard	Reference the revised definition of finished products in FSC-STD-40-004