

Version comparison: Incorporation of the FSC core labour requirements within the Chain of Custody Normative Framework and Changes to Chain of Custody Requirements.

This document assists in identifying and highlighting the key differences between the old requirements and the revised standards. The changes in this revision process are identified by colour ranking (see legend below) and in-text changes are highlighted.

As part of the revision, we have used the opportunity to incorporate existing advice notes and interpretations.

Legend



New requirement, or requirement changed significantly from the previous version of the standard.

Updated/amended. The requirement has been simplified or reworded for an improved understanding. Requirement removed.

Incorporated an existing advice note or interpretation.

FSC Chain of Custody Certification standard (FSC-STD-40-004)

Old Section / Clause	Old standard (V3-0) text	New Section/ Clause	New standard (V3-1) text	Rationale
В	Scope	В	Scope	
Box 2	-	Box 2 NOTE	NOTE: For NTFP products, it is acceptable that only one ingredient/component is FSC certified as long as clear reference to the certified ingredient/component is made on the FSC label and/or associated statements.	Incorporated interpretation: INT-DIR-40-004_04
1	COC management system	1	COC management system	



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1.3	The organization shall commit to the FSC values as defined in FSC-POL-01-004 by signing a self-declaration that the organization is not directly or indirectly involved in the following activities: a. illegal logging or the trade in illegal wood or forest products; b. violation of traditional and human rights in forestry operations; c. destruction of high conservation values in forestry operations; d. significant conversion of forests to plantations or non-forest use; e. introduction of genetically modified organisms in forestry operations; f. violation of any of the ILO Core Conventions, as defined in the ILO Declaration on Fundamental Principles and Rights at Work, 1998.	1.3	The organization shall commit to the FSC values as defined in FSC-POL-01-004 Policy for the Association of Organizations with FSC.	Removal of the 'self-declaration' for consistency and eliminates conflict and confusion around the language about the 'ILO Declaration on Fundamental Principles and Rights at Work' to align with Section 7 'FSC core labour requirements'. The 'Policy for the Association of Organizations with FSC (PfA)' is currently in the process of being revised, the requirement still requires organizations to commit to the FSC values as defined in the PfA independent of the revision status or outcome.
1.3 NOTE	NOTE: This clause will be modified once FSC concludes the revision process of its Policy for Association.	-	-	The 'Policy for the Association of Organizations with FSC (PfA)' is currently in the process of being revised, rendering the note irrelevant.
-	-	1.5	The organization shall adopt¹ and implement a policy statement, or statements, that encompass the FSC core labour requirements. The policy statements shall be made available to stakeholders (i.e. affected and interested stakeholders) and to the organization's certification body. ¹May develop a new policy or use an existing one.	Added a requirement for organizations to adopt and implement one or more policy statements.
-	-	1.6	The organization shall maintain an up-to-date self-assessment in which it describes how the organization applies the FSC core labour requirements to its operations. The self-	Added a requirement for self- assessments in which organizations describe how they



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				assessment shall be submitted to the organization's certification body.	apply the requirements to their operations.
	-	-	1.9 NOTE	NOTE: Pricing information is not within the scope of transaction verification data disclosure.	Incorporation of advice note:
					ADVICE-40-004-14 Supply Chain Integrity.
	,	-	1.10	The organization shall support fibre testing conducted by its certification body and ASI by surrendering samples and specimens of materials and products, and information about species composition for verification upon request.	Incorporation of advice note: ADVICE-40-004-14 Supply Chain Integrity.
	-	-	1.11	The organization may demonstrate compliance with other certifications schemes as evidence of conformity to Section 7 'FSC core labour requirements'.	Added a requirement which allows organizations to demonstrate compliance with other social certifications schemes as evidence of conformity with the FSC core labour requirements.
	-	-	1.11 NOTE	NOTE: FSC International will review the compatibility of these schemes with the FSC core labour requirements and the extent of their overlap with requirements in Section 7.	Added an option for other organizations to submit certification schemes which meet the FSC core labour requirements for review by FSC International.
	2.3	The organization shall have procedures in place to check the supplier's sale and/or delivery documentation to confirm that:	2.3	The organization shall check the supplier's sale or and/or delivery documentation (or both) to confirm that:	Updated for improved clarity. Procedures are already required in Clause 1.1 b). The term "procedure" was removed since the intention of this requirement is for certification bodies to check whether organizations effectively verify suppliers' documents, and



				not to check whether they have procedures for this.
4.2	The organization shall maintain up-to-date material accounting records (e.g. spreadsheets, production control software) of materials and products in the scope of the FSC certificate, including: a. inputs: purchase document number, date, quantities, and material category including the percentage or credit claim (if applicable);	4.2	The organization shall maintain up-to-date material accounting records (e.g. spreadsheets, production control software) of materials and products in the scope of the FSC certificate, including: a) inputs: supplier's sales document number, date, quantities, and material category including the percentage or credit claim (if applicable);	The standard does not define a 'purchase' document, updated for clarity.
5.7	If the organization is unable to include the FSC claim and/or certificate code in sales or delivery Documents	5.7	If the organization is unable to include the FSC claim and/or certificate code in sales or delivery documents (or both)	Further clarification.
5.8	Organizations that sell custom manufactured FSC products (e.g. woodworkers, building contractors, construction companies) that do not list the FSC-certified products on the invoice as required by Clause 5.1 may issue supplementary documents to the invoices issued for construction or other related services. The supplementary document shall include the following:	5.8	Organizations that supply custom manufactured FSC products (e.g. woodworkers, building contractors, construction companies) that do not list the FSC-certified products on the sales documents as required by Clause 5.1 may issue supplementary documents to the sales document issued for construction or other related services. The supplementary document shall include the following:	References to 'invoices' are replaced by 'sales or delivery documents or both'.
Figure A	Figure A. Rules for downgrading FSC output claims FSC 100% FSC Mix Credit / FSC Mix x% FSC Controlled Wood	Figure A	Rules for downgrading FSC output claims FSC 100% FSC Mix Credit FSC Mix x % FSC Controlled Wood	For improved clarity, FSC Mix Credit and FSC Mix x% are no longer at the same level.



6	Compliance with timber legality legislation	6	Compliance with timber legality legislation	
6.1 a. b. NOTE c.	The organization shall ensure that its FSC-certified products conform to all applicable timber legality legislation. At a minimum, the organization shall: a. have procedures in place to ensure the import and/or export of FSC-certified products by the organization conform to all applicable trade and customs laws1 (if the organization exports and/or imports FSC products); b. upon request, collect and provide information on species (common and scientific name) and country of harvest (or more specific location details if required by legislation) to direct customers and/or any FSC-certified organizations further down the supply chain that need this information to comply with timber legality legislation. The form and frequency of providing this information may be agreed upon between the organization and the requester; NOTE: If the organization does not possess the requested information on species and country of origin, the request shall be passed on to the upstream suppliers until the information can be obtained. c. ensure that FSC-certified products containing pre-consumer reclaimed wood (except reclaimed paper) being sold to companies located in countries where timber legality legislation applies either:	6.1 a) b) NOTE c)	The organization shall ensure that its FSC-certified and controlled wood products or timber products conform to all applicable timber legality legislation. At a minimum, the organization shall: a) have procedures in place to ensure the import and/or export and commercialization of FSC-certified and controlled wood products by the organization conform to all applicable trade and customs laws (if the organization exports and/or imports FSC products); b) upon request, collect and provide information on species (common and scientific name) and country of harvest (or more specific location details if required by legislation) to direct customers and/or any FSC-certified organizations further down the supply chain that need this information to comply with timber legality legislation. The form and frequency of providing this information may be agreed upon between the organization and the requester, as long as the information is accurate and can be correctly associated with each material supplied as FSC certified or FSC Controlled Wood. NOTE: Information on the sub-national regions or concessions of harvest is required where the risk of illegal harvesting between concessions of harvest in a country or sub-national region varies. Any arrangement conferring the right to harvest timber in a defined area is considered a concession of harvest. NOTE: If the organization does not possess the requested information on species and country of origin, the request shall be passed on to the	Incorporation of advice notes: ADVICE-40-004-10 Access to information required by timber legality legislations ADVICE-40-004-11 Trade and customs laws



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			upstream suppliers until the information can be obtained.	
			c) provide proof of compliance with relevant trade and customs laws;	
			d) ensure that FSC-certified products containing pre-consumer reclaimed wood (except reclaimed paper) being sold to companies located in countries where timber legality legislation applies either:	
-	-	7	FSC core labour requirements ³	Added a new section within the
			³ Source: FSC report on generic criteria and indicators based on ILO Core Conventions principles (2017).	standard.
-	-	7.1	In the application of the FSC core labour requirements, the organization shall give due consideration to the rights and obligations established by national law, while at the same time fulfilling the objectives of the requirements.	Added a requirement for organizations to consider the implications of national laws and their interplay with FSC core labour requirements.
-	-	7.2	The organization shall not use child labour.	Added the FSC core labour requirements based on the ILO
-	-	7.2.1	The organization shall not employ workers below the age of 15, or below the minimum age as stated under national, or local laws or regulations, whichever age is higher, except as specified in 7.2.2.	generic criteria and indicators that are underlined in the FSC report.
-	-	7.2.2	In countries where the national law or regulations permit the employment of persons between the ages of 13 to 15 years in light work, such employment should not interfere with schooling nor, be harmful to their health or development. Notably, where children are subject to compulsory education laws, they shall work only outside of	



-	-	7.2.3	No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulations.	
-	-	7.2.4	The organization shall prohibit the worst forms of child labour.	
-	-	7.3	The organization shall eliminate all forms of forced and compulsory labour.	
-	-	7.3.1	Employment relationships are voluntary and based on mutual consent, without the threat of a penalty.	
-	-	7.3.2	There is no evidence of any practices indicative of forced or compulsory labour, including, but not limited to, the following:	
			physical and sexual violence	
			bonded labour	
			withholding of wages /including payment of employment fees and or payment of deposit to commence employment	
			restriction of mobility/movement	
			retention of passport and identity documents	
			threats of denunciation to the authorities.	
-	-	7.4	The organization shall ensure that there is no discrimination in employment and occupation.	



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-	-	7.4.1	Employment and occupation practices are non-discriminatory.	
-	-	7.5	The organization shall respect freedom of association and the effective right to collective bargaining.	
-	-	7.5.1	Workers are able to establish or join worker organizations of their own choosing.	
-	-	7.5.2	The organization respects the full freedom of workers' organizations to draw up their constitutions and rules.	
-	-	7.5.3	The organization respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.	
-	-	7.5.4	The organization negotiates with lawfully established workers' organizations and/ or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.	
-	-	7.5.5	Collective bargaining agreements are implemented where they exist.	
7	Establishment of product groups for the control of FSC claims	8	Establishment of product groups for the control of FSC claims	
7.2 NOTE	NOTE: An input material and/or species of wood of a product group may be substituted by another material and/or species provided that they are equivalent. Variations of material or product dimension or shape are accepted within the same product group. Different types of wood pulp are considered as equivalent input materials.	8.2 NOTE	An input material and/or species of wood of a product group may be substituted by another material and/or species provided that they are equivalent. Variations of material or product dimension or shape are accepted within the same product group. Different types of wood pulp are considered as equivalent input materials, except	Incorporated interpretation: INT-STD-40-004_36



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				virgin and reclaimed wood fibres that are not equivalent input materials.	
	-		8.2 NOTE	NOTE: Virgin and reclaimed wood fibres can be combined in the same credit account in the case of products that are made with both materials (mixed fibres). However, for 100% recycled products, the FSC credit shall only be taken from the reclaimed input materials. The same applies to 100% virgin fibre products, where the credits shall only be taken from virgin input materials.	Incorporated interpretation: INT-STD-40-004_36
	Box 4	Substitution of input materials within a product group	Box 4	Substitution of input materials within a product group (applicable to all FSC control systems)	Included clarification that Box 4 applies to all control systems.
	8	Transfer system	9	Transfer system	
	Table D	Possible combinations of FSC input claims and resulting output claims when applying the transfer system	Table D	Possible combinations of FSC input claims and resulting output claims when applying the transfer system Incorporated pre-consumer reclaimed wood with no FSC claims allowed.	Incorporated interpretation: INT-STD-40-004_15
	9	Percentage system	10	Percentage system	
	9.2	For FSC Mix and FSC Recycled inputs, the organization shall use the percentage claim or credit claim stated on the supplier invoice to determine the quantity of claim-contributing inputs.	10.2	For FSC Mix and FSC Recycled inputs, the organization shall use the percentage claim or credit claim stated on the supplier's sales or delivery documentation (or both) to determine the quantity of claim-contributing inputs.	References to 'invoices' are replaced by 'sales or delivery documents or both'.
	9.4 NOTE	NOTE: FSC will monitor the environmental, social, and economic benefits and costs of the application of the percentage system at a multiple site level and re-evaluate after two years. Organizations applying the percentage system at a multiple site level are required to participate in this monitoring process by providing the information as requested by FSC.	-	-	Removed the note to facilitate the percentage/credit system pilot project.



10	Credit system	11	Credit system	
10.3 NOTE	NOTE: FSC will monitor the environmental, social, and economic benefits and costs of the application of the credit system at the multiple site level and reevaluate it after two years. Organizations applying the credit system at a multiple site level are required to participate in this monitoring process by providing the information as requested by FSC.	-		Removed the note to facilitate the percentage/credit system pilot project.
10.4	For FSC Mix and/or FSC Recycled inputs, the organization shall use the percentage claim or credit claim stated on the supplier invoice to determine the quantity of claim-contributing inputs.	11.4	For FSC Mix and/or FSC Recycled inputs, the organization shall use the percentage claim or credit claim stated on the supplier's sales or delivery documentation (or both) to determine the quantity of claim-contributing.	References to 'invoices' are replaced by 'sales or delivery documents or both'.
10.5	When the credit system is applied to assembled wood products, and where inputs of different quality are combined, high-quality components that are sourced as controlled material or FSC Controlled Wood shall not represent more than 30% of the product group's composition (by volume or weight).	11.5 a) b) c)	When the credit system is applied to assembled wood products, and where inputs of different quality are combined, high-quality components that are sourced as controlled material or FSC Controlled Wood shall not represent more than 30% of the product group's composition (by volume or weight). In the context of this Clause, the following criteria define quality:	Incorporated interpretation: INT-STD-40-004_31
			 a) all products that are made of chip and particles of wood are considered as having the same quality; 	
			 b) solid wood components are considered as having a higher quality than components of chip and particles of wood; 	
			c) solid hardwood is considered as having higher quality than softwood.	
12	Outsourcing	13	Outsourcing	



	organization (i.e. the non-certified contracting organization shall not take physical possession of the materials before outsourcing).		to the organization (i.e. the non-certified contracting organization shall not take physical possession of the materials before outsourcing). The output product shall be finished, FSC	
	contracting organizations, it is acceptable that the contracting organization buys the raw material for the outsourced processes. To ensure that the CoC is not broken, the material shall be transported directly from an FSC-certified supplier to the		contracting organizations, it is acceptable that the contracting organization buys the raw material for the outsourced processes. To ensure that the CoC is not broken, the material shall be transported directly from an FSC-certified supplier	CoC contractors
12.9	When the organization provides FSC-certified outsourcing services to non-FSC-certified contracting organizations, it is acceptable that the	13.10	When the organization provides FSC-certified outsourcing services to non-FSC-certified contracting organizations, it is acceptable that the	Incorporated Advice Note: ADVICE-40-004-01 FSC certified
			NOTE: Information on prices can be blacked out.	
			they have a copy of the invoice(s) from the delivering supplier(s) and, if not identical, from the billing supplier(s) that include(s) information sufficient to link the invoice(s) and related transport documentation to each other.	ADVICE-40-004-01 FSC certified CoC contractors
-	-	13.9	The FSC-certified contractor shall ensure that	Incorporated Advice Note:
	requirements specified in Clause 5.1. Contractors are not required to identify the invoices of materials after outsourcing.		outsourcing following the requirements specified in Clause 5.1. Contractors are not required to identify the invoices of materials after outsourcing.	documents or both'.
12.7	The organization shall identify the invoices of materials sent for outsourcing following the	13.7	The organization shall identify the sales or delivery documents (or both) of materials sent for	References to 'invoices' are replaced by 'sales or delivery
	following:		that ensure the following:	INT-STD-40-004_33
12.5	The organization shall provide documented procedures to its contractor(s) that ensure the	13.5	The organization shall provide documented procedures to its non-FSC certified contractor(s)	Incorporated interpretation:



NOTE: The annual turnover criteria is only applicable to organizations that have for-profit activities.			NOTE: The annual turnover criteria is only applicable to organizations that have for-profit activities. The total annual turnover of non-profit
			organizations is calculated based on the sales of forest-based products rather than based on revenues of all goods and services.
Examples of produc	et groups	Annex A	Examples of product groups (informative) Included an indicator that the Annex is informative.
combination of MDF and veneer	and maple veneer cannot be exchanged without altering the output product quality (i.e. value and appearance).		Product group examples Tables made of a combination of MDF and veneer are not equivalent species according the requirement in Box 4 (i.e. value and appearance of the output product are affected by the substitution of species). Tables made of a combination of MDF and melamine paper Tables made of a combination of MDF and melamine paper Tables made of a combination of MDF and melamine paper Alignment with the concept of equivalency detailed in Box 4. Alignment with the concept of equivalency detailed in Box 4. Alignment with the concept of equivalency detailed in Box 4.
	Product group examples Tables made of a combination of MDF and veneer	applicable to organizations that have for-profactivities. Examples of product groups Product group examples Tables made of a combination of MDF and veneer and appearance). Tables made of a combination of MDF and melamine paper A considered quality Rationale Walnut, sapele, and maple veneer cannot be exchanged without altering the output product quality (i.e. value and appearance). Printing, painting, and other finishing processes are not considered quality	applicable to organizations that have for-profit activities. Examples of product groups



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				activities can still be considered as equivalent.	
	Annex B	Examples of the application of the FSC control systems	Annex B	Examples of the application of the FSC control systems (informative)	Included an indicator that the Annex is informative.
-	-	-	Annex D	Examples of Which components of a product need to be certified (normative) Included a new section/annex with examples of which components of a product needs to be certified. FSC core labour requirements self-assessment (normative)	Incorporated advice note and interpretation: ADVICE-40-004-06 Which components of a product need to be certified? INT-DIR-40-004_03 INT-DIR-40-004_02 The self-assessment template is for organizations to describe how
	Annex C	Terms and definitions	Annex E	Added the FSC core labour requirements self-assessment template Terms and definitions	they apply the FSC core labour requirements to their operations. They are required to gather evidence to demonstrate compliance and list them within the assessment.
	-	-	-	Affected stakeholder: Any person, group of persons or entity that is or is likely to be subject to the effects of the activities of the organization. Examples include but are not restricted to workers, persons, groups of persons or entities	Added a new definition concerning the FSC core labour requirements.



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			located or working in the operations and sites of the organization.	
-	-	-	Child: any person under the age of 18 (ILO Convention 182, Article 2).	
-	-	-	Collective bargaining: a voluntary negotiation process between employers or employers' organization and workers' organization, with a view to the regulation of terms and conditions of employment by means of collective agreements (ILO Convention 98, Article 4).	
-	-	-	Discrimination: includes- a) any distinction, exclusion or preference made on the basis of race, colour, sex, religion, political opinion, national extraction, social origin, sexual orientation, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation; b) such other distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation as may be determined by the Member concerned after consultation with representative employers' and workers' organizations where such exist, and with other appropriate bodies (adapted from ILO Convention 111, Article 1).	
-		-	Employment and Occupation: includes access to vocational training, access to employment and to particular occupations, and terms and conditions of employment (ILO Convention 111, Article 1.3).	
-	-	-	FSC core labour requirements: International Labour Organization (ILO) generic criteria and indicators that are underlined in the FSC report covering fundamental principles and rights at	



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			work: freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation. 9FSC report on generic criteria and indicators based on ILO Core Conventions principles, 2017.	
-	-	-	Forced or compulsory labour: Work or service exacted from any person under the menace of any penalty and for which the said person has not offered himself/ herself voluntarily (ILO Convention 29, Article 2.1).	
-	-	-	Fibre Testing: a suite of wood identification technologies used to identify the family, genus, species and origin of solid wood and fibre based products.	Added new definition related to the incorporation of advice note: ADVICE-40-004-14 Supply Chain Integrity.
	-	-	Good Faith in negotiation: The Organization (employer) and workers' organizations make every effort to reach an agreement, conduct genuine and constructive negotiations, avoid unjustified delays in negotiations, respect agreements concluded and give sufficient time to discuss and settle collective disputes (Gerning B, Odero A, Guido H (2000), Collective Bargaining: ILO Standards and the Principles of the Supervisory Bodies. International Labour Office, Geneva).	Added a new definition concerning the FSC core labour requirements.
-	-	-	Interested stakeholder: Any person, group of persons, or entity that has shown an interest, or is known to have an interest, in the activities of the organization.	



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-	-	-	Light work: national laws or regulations may permit the employment or work of persons 13 to 15 years of age on light work which is- a) not likely to be harmful to their health or development; and b) not such as to prejudice their attendance at school, their participation in vocational orientation or training programs approved by the competent authority or their capacity to benefit from the instruction received (ILO Convention 138, Article 7).	
	-	-	National laws: The whole suite of primary and secondary laws (acts, ordinances, statutes, decrees), which is applicable to a national territory, as well as secondary regulations, and tertiary administrative procedures (rules / requirements) that derive their authority directly and explicitly from these primary and secondary laws.	
		-	Outsourcing agreement: A written agreement between a contracting organization and a contractor about the service of producing or processing an FSC-certified product or material, where the contracting organization retains control of and responsibility for the purchasing of input material from the (billing) supplier and for the sale of the output product to the customer. Input material may be shipped from the contracting organization or from the (delivering) supplier to the contractor and the output product may be returned or shipped from the contractor to the contracting organization or to the contracting organization's customer.	Added new definition related to the incorporation of advice note: ADVICE-40-004-01 FSC certified CoC contractors
-		-	Product grades: categories assigned to products having the same or similar functional use and/or nomenclature (e.g. lumber) but different technical or visual characteristics (e.g. lumber with several	New definition previously requested by stakeholders.



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				knots is typically graded in a different category than lumber without knots).	
	-	-	-	Stakeholder: See definitions for 'affected stakeholder' and 'interested stakeholder'.	Added a new definition concerning the FSC core labour requirements.
	-		-	Site: A single functional unit of an organization situated at one physical location, which is geographically distinct from other units of the same organization. Organization's sub-sites 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. Typical examples for sites are processing or trading facilities such as manufacturing sites, sales offices, or warehouses owned by the organization.	Alignment of this definition with the definition of 'site' in FSC-STD-40-003.
	-	-	-	Workers ¹⁰ : All employed persons including public employees as well as 'self-employed' persons. This includes part-time and seasonal employees, of all ranks and categories, including laborers, administrators, supervisors, executives, contractor employees as well as self-employed contractors and sub-contractors (Source: ILO Convention 155 Occupational Safety and Health Convention, 1981).	Added a new definition concerning the FSC core labour requirements.
				¹⁰ Definition of functions of employees such as supervisors varies from country to country. In situations where they have authority, in the interest of the employer or management to hire, transfer, suspend, lay off, recall, promote, discharge, assign, reward or discipline other	



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			employees or have responsibility to direct them, they may be non-eligible to join unions.	
-	-	-	Workers' organization: Any organization of workers* for furthering and defending the interest of workers (adapted from ILO Convention 87, Article 10). It is important to note that rules and guidance on composition of workers' organization vary from country to country, especially in relation to those who are considered as rank and file members, as well those who are deemed to have power to "hire and fire". Workers' organization tend to separate association between those who can "hire and fire" and those who cannot.	
-	-	-	Worst forms of child labour: Comprises a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced labour, including forced or compulsory recruitment of children for use in armed conflict; b) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performance; c) the use, procuring or offering of a child for illicit activities, in particular for production and trafficking of drugs as defined in the relevant international treaties; d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children (ILO Convention 182, Article 3).	



Chain of Custody Evaluations standard FSC-STD-20-011

Clause	Current standard (V4-1)	Clause	New standard (V4-2)	Rationale
E	Terms and definitions	E	Terms and definitions	
-	-	-	Affected stakeholder: Any person, group of persons or entity that is or is likely to be subject to the effects of the activities of the organization. Examples include but are not restricted to workers, persons, groups of persons or entities located or working in the operations and sites of the organization.	Added a new definition concerning the FSC core labour requirements.
-	-	-	Evaluation findings: Results of the evaluation of the collected audit evidence against audit criteria and can thus indicate conformity or nonconformity. Audit evidence consists of records, statements of fact or other information relevant to the audit criteria and is verifiable. Audit reports for chain of custody shall include systematic presentation of findings rather than simply evidence. Findings demonstrating conformity shall include a description of how conformity is achieved or maintained.	
-	-	-	Force majeure: or "act of God". Examples are war, strike, riot, political instability, geopolitical tension, terrorism, crime, pandemic, flooding, earthquake, malicious computer hacking, other natural or man-made disasters. (term used in IAF ID3:2011).	Added a new definition related to the incorporation of advice note: ADVICE-20-11_10 Replacement of onsite audits by desk (remote) audit
-	-	-	False claim: FSC claim made on sales documents (physical or electronic), or the use of the FSC trademarks, on products and for projects that are not eligible to be claimed, labelled and/or promoted as being FSC-certified or FSC Controlled Wood. A false claim is different from	Updated existing definition according to ADVICE-40-004-18 Addressing deliberate false claims.



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	an inaccurate claim, in which a product that is eligible to be sold as FSC-certified is sold with the wrong claim.	
	FSC core labour requirements: International Labour Organization (ILO) generic criteria and indicators that are underlined in the FSC report ² covering fundamental principles and rights at work: freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation. ² FSC report on generic criteria and indicators based on ILO Core Conventions principles, 2017.	Added a new definition concerning the FSC core labour requirements.
Site: A single functional unit of an orget situated at one physical location, geographically distinct from other units of organization. An organization's units with physical locations may, however, be regarded for a site if they are an extension of with no purchasing, processing, or sales of their own (e.g. a remote stockholding). In a never include more than one legarded for contractors that are used within the outsourcing agreements (e.g. of warehouse) are not considered sites examples of sites include processing of facilities such as manufacturing sites, sales or company-owned warehouses.	situated at one physical location, which is geographically distinct from other units of the same organization. Organization's sub-sites 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. Typical examples for sites are processing or trading facilities such as manufacturing sites,	Alignment of this definition with the definition of 'site' in FSC-STD-40-003 and FSC-STD-40-004.
	Stakeholder: See definitions for 'affected stakeholder' and 'interested stakeholder'.	Added a new definition concerning the FSC core labour requirements.
-	Workers ⁴ : All employed persons including public employees as well as 'self-employed' persons. This includes part-time and seasonal employees,	



FSC			of all ranks and categories, including laborers,	
			administrators, supervisors, executives, contractor employees as well as self-employed contractors and sub-contractors (Source: ILO Convention 155 Occupational Safety and Health Convention, 1981).	
			⁴ Definition of functions of employees such as supervisors varies from country to country. In situations where they have authority, in the interest of the employer or management to hire, transfer, suspend, lay off, recall, promote, discharge, assign, reward or discipline other employees or have responsibility to direct them, they may be non-eligible to join unions.	
-	-		Workers' organization: Any organization of workers for furthering and defending the interest of workers (adapted from ILO Convention 87, Article 10). It is important to note that rules and guidance on composition of workers' organization vary from country to country, especially in relation to those who are considered as rank and file members, as well those who are deemed to have power to "hire and fire". Workers' organization tend to separate association between those who can "hire and fire" and those who cannot (Source: FSC report on generic criteria and indicators based on ILO Core Conventions principles, 2017).	
-		1.1 NOTE	NOTE: The timeline commences from when the corrective action request is formally accepted by or formally presented to the organization	Incorporated interpretation: INT-STD-20-011_01
2	Evaluation requirements	2	(whichever occurs first). Evaluation requirements	
2.6 b)	interviews with a sufficient variety and number of employees and contractors at each operational site	2.6 b)	interviews with a sufficient variety and number of employees, their representatives including	Added additional interview requirements for auditors to



rsc	selected for evaluation in order to verify the organization's conformance to all applicable certification requirements. As a minimum, interviews shall be conducted to verify training measures and understanding of individual responsibilities at different locations across the operation under evaluation. The interviewer shall ensure that comments can be provided in confidence;		worker's organizations, employer's representatives and contractors at each operational site selected for evaluation in order to verify the organization's conformance to all applicable certification requirements. The interviewer shall ensure that comments can be provided in confidence;	conduct interviews with representatives.
2.6 b)	interviews with a sufficient variety and number of employees and contractors at each operational site selected for evaluation in order to verify the organization's conformance to all applicable certification requirements. As a minimum, interviews shall be conducted to verify training measures and understanding of individual responsibilities at different locations across the operation under evaluation. The interviewer shall ensure that comments can be provided in confidence;	2.6 c)	c) as a minimum, interviews shall be conducted to verify training measures and understanding of individual responsibilities at different locations across the operation under evaluation;	The requirement was separated from 2.6 b) V4-1 for simplification.
-		2.7	In situations where physical inspection of sites selected for evaluation is not possible or viable due to: a) demonstrated health and/or safety risk to auditors (demonstrated through verifiable public sources, e.g. official travel warnings or restrictions), or b) travel restrictions imposed by organizational (certificate holder/ certification body) health and safety policies or public authorities, or c) other demonstrated events of force majeure, the certification body may apply for a derogation to replace an onsite audit with a desk audit.	Incorporated advice note: ADVICE-20-11_10 Replacement of onsite audits by desk (remote) audit



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				Derogation applications will be evaluated on a case by case basis. The application shall include:	
				i. certificate code of the company;	
				ii. activities under the scope of the certificate (products and processes);	
				iii. evidences of circumstances preventing the onsite audit (e.g. an official travel warning);	
				iv. other additional information, as requested by FSC.	
				NOTE: In case of existing active derogations issued by FSC International for specific situations, this clause is not applicable.	
	3	Surveillance evaluations	3	Surveillance evaluations	
-	-	-	3.4	When new or revised standards become effective, Clause 3.3 may be applied for surveillance evaluations, if the following requirements are met: a) the certification body shall conduct an assessment of the organization's procedures against the relevant new standard requirements at the regular time scheduled for the surveillance audit.	Incorporation of advice note: ADVICE-20-011-02 Ensuring organizations' compliance with newly effective standard requirements when resuming FSC business activity
				b) The assessment shall be carried out on-site if: i. the organization's chain of custody system requires adjustments due to the changed requirements that, if left unaddressed, are likely to result in major non-compliances;	



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			ii. the organization will use a new system for controlling FSC claims under a specific product group (FSC-STD-40-004);	
			iii. the certification body deems this necessary to evaluate the implementation of corrective action requests or a change of the certificate scope.	
			NOTE: The intent is to ensure that organizations are in full compliance with the new or revised standard at the time they again take up activities under the scope of their FSC chain of custody certificate.	
			c) in case a suspension of an organization's chain of custody certificate extends beyond the scheduled time of their regular surveillance audit at the time of which a certification standard has become effective — new or following a major revision. The certification body shall conduct an assessment of the organization's procedures to ensure that they are in compliance with relevant new standard requirements at the time when suspension is lifted.	
6	Evaluation of controlled wood according to FSC-STD-40-005	6	Evaluation of controlled wood according to FSC-STD-40-005	
6 NOTE	NOTE: Stakeholder consultation requirements apply only for the first evaluation and subsequent re-evaluations of the organization to FSC-STD-40-005. However, these are applicable only where material is sourced from unassessed, specified, or unspecified risk areas according to the applicable FSC risk assessment.	6 NOTE	NOTE: Stakeholder consultation requirements apply only for the first evaluation and subsequent re-evaluations of the organization to FSC-STD-40-005. However, these are applicable only where material is sourced from unassessed, or specified risk, areas according to the applicable FSC risk assessment.	Update to align with FSC-STD-40- 005 V3-1 Requirements for Sourcing FSC Controlled Wood.
6.10	The certification body shall verify whether the organization's risk assessment and risk	6.10	6.10 The certification body shall verify whether the organization's risk assessment and risk	



designations are adequate and justified, including whether:

- a) In the case of company and extended company risk assessments:
 - i. the risk assessment follows all applicable requirements;
 - ii. the sources of information used are independent, objective, and sufficient to justify risk designation;
 - iii. the geographic scale of the assessment is adequate to the supply area(s);
 - iv. the risk designation is justified and verifiable based on sources used in the risk assessment:
- b) In the case of extended company risk assessments:
 - i. the risk specification includes sufficient information to allow the development of adequate control measures;
 - ii. consultations with experts have been conducted as required;
 - iii. experts used to conduct the risk assessment meet the qualification requirements in Annex C of FSC-STD-40-005;
 - iv. joint risk assessments are managed as required;
- c) In the case of company risk assessments:

designations are adequate and justified, including whether:

- the risk assessment follows all applicable requirements;
- ii. the sources of information used are independent, objective, and sufficient to justify risk designation;
- iii. the geographic scale of the assessment is adequate to the supply area(s);
- iv. the risk designation is justified and verifiable based on sources used in the risk assessment:
- v. the risk specification includes sufficient information to allow the development of adequate control measures;
- vi. consultations with experts have been conducted as required;
- vii. experts used to conduct the risk assessment meet the qualification requirements in Annex C of FSC-STD-40-005;
- viii. joint risk assessments are managed as required;
- ix. the risk designation is justified with evidence by using independent and objective sources of information.



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		 i. the risk assessment is consistent with the publicly available information and ii. the risk designation is justified with evidence by using independent and objective sources of information. 							
	7	Evaluation of group and multisite chain of custody certificates	7	Evaluation of group and multisite chain of custody certificates					
-	-	-	7.6	Sites that have been incorporated into the certificate scope in the period between the certification body's evaluations shall be sampled together with the sites that were already in the scope at the previous evaluation.	Incorporated interpretation: INT-STD-20-011_26				
	-	-	11	FSC core labour requirements					
	-	-	11.1	The certification body shall verify that the organization has adopted ⁶ and implemented a policy statement, or statements, that encompass the FSC core Labour Requirements. ⁶ May develop a new policy or use an existing one.	Added a requirement for auditors to verify the organization has adopted and implemented the policy statement(s) and it is available to stakeholders.				
	-	-	11.2	The certification body shall verify that the policy statements are made available to stakeholders.					
	-	-	11.3	The certification body shall design and implement a system for evaluating the relevance, effectiveness, and adequacy of the organization's self-assessment and conformity to Section 7 of FSC-STD-40-004, according to the scope, scale, intensity and risk of the organization's operation. The certification body shall specify, justify and document in its system the means of verification	Added a requirement for certification bodies to design and implement a system for auditors to evaluate the organization's self-assessment and their conformity to the FSC core labour requirements.				



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			of the self-assessments, including, but not limited to:	
-	-	11.3 a)	a mechanism for verifying self-assessments against available sources of information and applicable requirements;	
-	-	11.3 b)	identifying the legal requirements related to the FSC core labour requirements and applicable to the organization/site.	
-	-	11.3 c)	corroborating evidence provided by the organization with independent sources when possible. (e.g. documentation, interviews etc.) as required according to Section 2.6 'Evaluation at the level of the operational site'.	
-	-	11.3 d)	determining the frequency and sampling requirements of future audits within the certification cycle for each organization based on the results of the previous audit related to the FSC core labour requirements and the self-assessment.	
-	-	11.3 e)	including auditors with specific competencies if needed.	
11	Reporting requirements	12	Reporting requirements	
-	-	12 TABLE B NOTE	NOTE: Summaries of the systematic presentation of findings demonstrating conformity or nonconformity are acceptable, as long as the critical control points are addressed, and conformity with the standard sections indicated in bold is summarized in a way that allows the decision-making entity to make an informed decision on the overall conformity or nonconformity of the implemented system.	Incorporated interpretation: INT-STD-20-011_25