



Welcome to the webinar “FSC Mix and Controlled Wood” . The goal today is to inform you about the rules behind the FSC Mix label and how FSC Controlled Wood is used in FSC certified products.

This webinar as a joint effort of 3 programs of the FSC International. Representing the FSC Chain of Custody program is Lucia Massaroth, who will present the chain of custody rules related to FSC Mix products.

From the FSC Trademark program, FSC Trademark Manager Saija Hotti is here to present the trademark requirements.

My name is William Cook. I am the Controlled Wood Policy Officer, and I will be presenting the information on the Controlled Wood program. Also from the Controlled Wood program are Joanna Nowakowska, FSC Controlled Wood program manager, as well as Policy Managers Tania Einfeldt and Tatjana Stutzkowsky.

Agenda



Today's content is divide into 3 parts:

In the first part we will present the chain of custody rules about FSC Mix products.

The second part will cover information about labelling and trademark use.

Finally, we will explain the context of FSC Controlled Wood.

The webinar will be followed by a Question & Answer session where you will have the opportunity to submit your questions. The webinar will be recorded and posted on the controlled wood webpage, Chain of Custody webpage, and the membership portal.

We assume that you have different levels of knowledge about FSC standards. Therefore we will not focus on the very specific and complex technical details, and rather give you an overview of the requirements and activities related to their implementation.



Now I'll hand over to Lucia, who will present the information on FSC Mix products in the chain of custody.

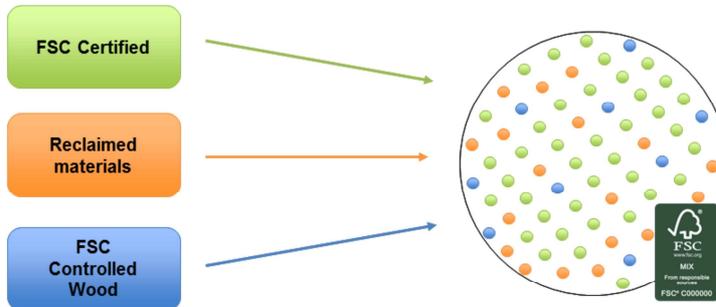
The FSC Mix label



To start, we would like to make a basic introduction about the FSC Mix label. As you can see in this slide, the label specifies that the product is a mix of materials from responsible sources, without any percentage information. In the next slides, we are going to explain what is behind the label.

How are FSC Mix products made?

ELIGIBLE INPUTS



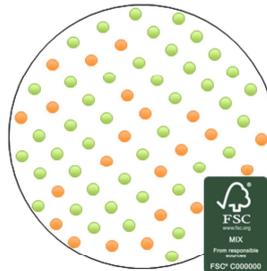
FSC Mix products are a combination of different types of input materials. But please note that there are restrictions on which types of materials can be used in FSC Mix products. Only FSC certified materials, reclaimed materials, and FSC Controlled Wood can be used in FSC Mix products.

How are FSC Mix products made?

ELIGIBLE INPUTS

FSC Certified

Reclaimed materials



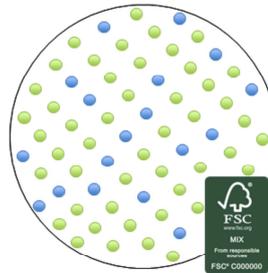
Different combinations are possible: some FSC Mix products contain only FSC certified and reclaimed materials.

How are FSC Mix products made?

ELIGIBLE INPUTS

FSC Certified

FSC Controlled Wood



Others contain only FSC certified and FSC controlled wood. Or only Reclaimed materials and FSC Controlled Wood.

The History of the FSC Mix label



But why did FSC introduced the FSC Mix label in the market? This slide contains two relevant graphics: On the right left side, the evolution of the FSC labelling thresholds over time, and on the right side what happened with the number of FSC certificates worldwide during the same period.

“Labelling threshold” means the minimum percentage of FSC certified content that is necessary in a product in order to label it as FSC certified.

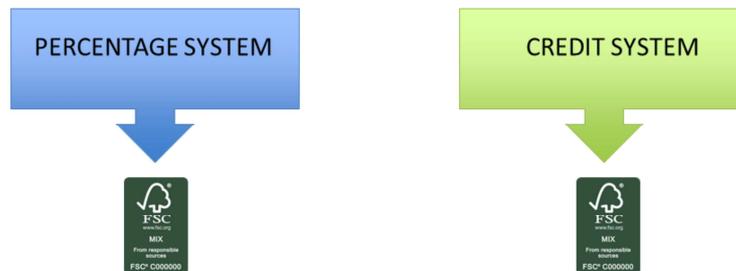
As you can see, in the early years of FSC, only products that were 100% certified could carry the FSC label. This rule remained unchanged, and the number of FSC certificates was very small, until 1997, when FSC decided to introduce FSC Mix products in the system. According to the stakeholder feedback received at that time, keeping FSC certified material separate from non-certified material was logistically not possible and too expensive.

Three years later, in the year 2000, FSC reduced the labelling threshold to 30% for chip and fibre products only . But since then, the threshold increased first to 50% and now in, in 2017, it is 70%.

Since the introduction of FSC Mix products, we observed a substantial growth in the number of certificates. The graphics only contain information until 2011, but the trends have been maintained since then.

One important thing happened in 2004 : The concept of controlled wood was introduced in the FSC system requiring certificate holders to ensure a certain level of control on the non-certified materials that were mixed with FSC certified materials. Before 2004, there was no control on the origin of non-certified wood that was mixed in FSC certified products. The FSC Controlled Wood standard was introduced to protect the integrity of the FSC system and ensure that wood from sources that are considered unacceptable do not enter the FSC system. More information about controlled wood will be presented later in this webinar.

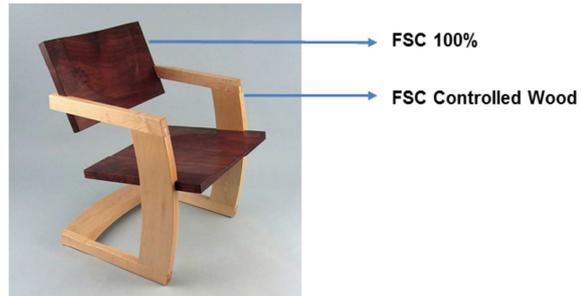
Systems for controlling FSC Claims



And now we are going to explain how companies control the materials they use in production and how they determine the FSC claim that shall be applied to their products. For this purpose, they use what is called the “FSC Control System”.

There are 3 FSC control systems in the FSC CoC standard. They are: The Transfer, Percentage, and Credit Systems. But in this presentation, we are going to talk about the Percentage and Credit Systems only, since these are the systems that are relevant to understand the composition of FSC Mix products. First, let’s talk about the Percentage system.

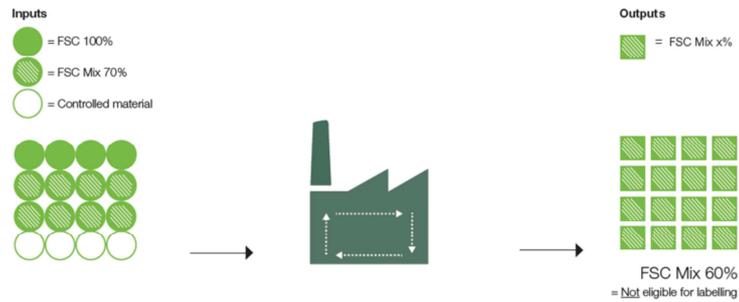
FSC Percentage System



* Images in this presentation are extracted from the internet.

In the Percentage System, as the name says, we need to know what percent of certified content in the product.

And this is done by a simple percentage calculation. In this slide, you can see an hypothetical example of a product that has components that are FSC 100% and other components that are FSC Controlled Wood. Based on the volumes of each component, the percentage is determined and the product is sold as FSC Mix with a certain percentage.



The FSC claim for the output is calculated as follows:

$$\left. \begin{array}{l} 4 \text{ units of FSC 100\% input} \\ 8 \text{ units of FSC Mix 70\% input} \\ 4 \text{ units of controlled material} \end{array} \right\} \frac{(4 \times 1) + (8 \times 0.7) + (4 \times 0)}{4 + 8 + 4} \times 100\% = \frac{4 + 5.6 + 0}{16} \times 100\% = 60\%$$

We are not going into the details of how the percentage is calculated in this webinar. This slide is just to show that there is a methodology in the standard to determine the percentage of *certified material* in an FSC Mix product.

What counts towards the % calculation?

“Only materials that come from FSC certified forests or reclaimed sources count towards percentage calculations. The FSC Controlled Wood volumes do not count towards the percentage information.”

Only materials that come from FSC certified forests or reclaimed sources count towards percentage calculations. The FSC Controlled Wood volumes do not count towards the percentage information.

FSC Percentage System

$\geq 70\%$



$< 70\%$

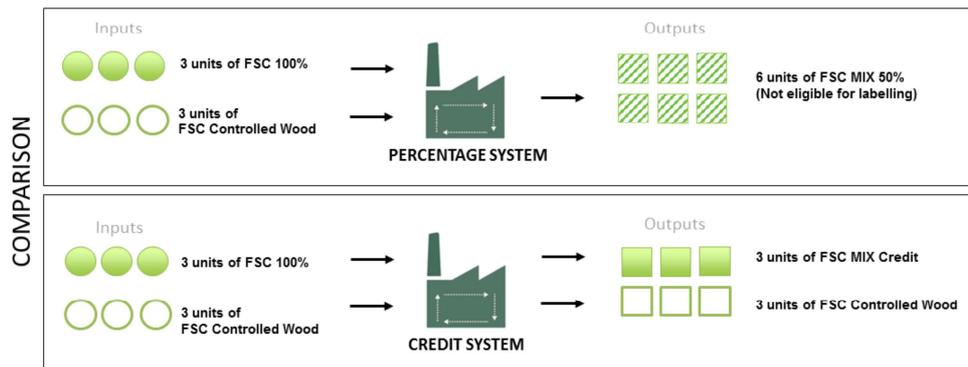


If the percentage of certified or reclaimed content in a product *is more or equal* to 70%, then the products can be labelled as FSC Mix.

If the percentage is lower than 70%, the product cannot be labelled as FSC certified. Some stakeholders believe there is more FSC Controlled Wood in the market than FSC certified, however this is not possible according to FSC rules. The maximum amount of FSC Controlled Wood in a product is 30%, and only if the percentage system is applied. In the credit system, as we are going to explain at the next slide, the whole product volume sold as FSC certified shall come from FSC certified sources; the percentage rules do not apply.

FSC Credit System

The FSC claim comes from the FSC certified and/or reclaimed material inputs used in the production. FSC Controlled Wood volumes do not count towards the volume of products that can be sold as FSC certified.



NOTE: To simplify the examples, we are not considering conversion factors and possible scenarios with reclaimed inputs.

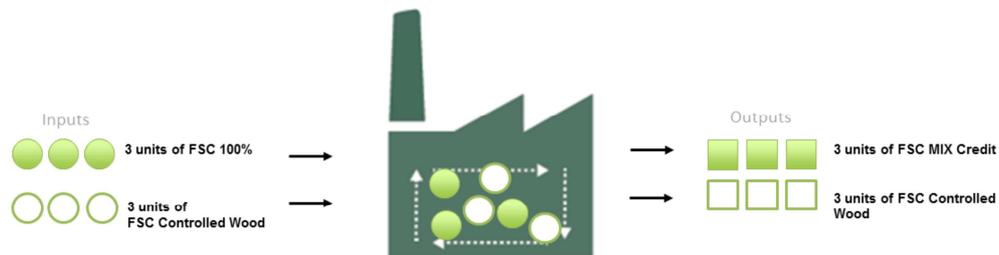
And now we are going to explain the FSC Credit System. In this system, the FSC claim comes from the FSC certified and/or reclaimed material used in the production. FSC Controlled Wood volumes do not count towards the volume of products that can be sold as FSC certified.

To better explain this, we have a graphical example comparing the percentage and the credit systems.

Let's get back to Percentage system for a moment. A company receives 3 units of FSC 100% certified input and 3 units of FSC Controlled Wood. If they apply the Percentage system, after production they could sell the whole production (6 units) with an FSC Mix 50% claim. And as we explained before, since the percentage is *less than 70%*, the product **cannot** carry the FSC label.

The second graphic shows the same situation in the credit system. The company received 3 units of FSC certified and 3 units of FSC Controlled Wood. However, in the credit system, they cannot sell the whole production as FSC Mix. Only 3 units can be sold as FSC Mix Credit, while the other 3 units are sold as FSC Controlled Wood.

Credit system



- *There is no segregation in the credit system.*
- *Only eligible inputs shall enter the production (certified, reclaimed or controlled).*
- *The quantities sold as FSC Mix Credit shall be proportional to the quantities received for production.*

A main characteristic of the credit system is that there is no segregation in the production. One of the main reason for companies to choose the credit system is the impossibility to segregate materials during the production process, or because this would be too complex or onerous. This means that all materials can be mixed during the production process, but the quantity of products that are sold as FSC Mix are always proportional to the quantities of certified inputs received. These quantities are controlled on what we call FSC Credit Account.

The Credit system is crucial for the paper and pulp industry, where segregation poses exceptional challenge.



Now I'll hand over to my colleague Saija, who will present information the FSC Mix label itself.

FSC LABELS



FSC 100%



FSC RECYCLED



FSC MIX

Thank you, Lucia!

Let's start by having a look at all the FSC on-product labels. There are three labels, to match the three FSC claim types.

The first one on the left, the 100% label, contains material from FSC-certified forests only.

In the middle we have the Recycled label, containing only reclaimed material.

And on the far right, we have the topic of today's discussion, the FSC **MIX label** for products containing a combination of material from FSC certified forests, FSC Controlled Wood or eligible recycled fiber.

As you can see, the text in the middle of the label varies according to the claim. The MIX one says "from responsible sources".

REVISION OF FSC-STD-50-001

Main goal:

To streamline requirements for **easier labeling and promotion**.

- Scheduled 5 year revision
- Motion 29 and 36, GA 2014
- Strategy 2015-2020



The labels and their contents have been discussed in the context of revision of FSC requirements for the use of the FSC trademarks by certificate holders. The process started in 2015 with the goal of simplifying labeling and promotion of FSC-certified products and FSC-certification. This was also the request by Motion 29 from General Assembly 2014.

The new FSC Global Strategic Plan 2015-2020, approved that same year, called for reviewing the label text for accurate communication of use of controlled wood and related processes behind that label. Behind this request is a concern expressed by environmental and social chamber members that the current wording of the label "from responsible sources" is misleading and in violation of principle known as truth in labeling.

So far, the revision process has seen two public consultations, the second one closing in end of April this year.

So, how has the label text issue been addressed during the process? And where are we now?

DISCUSSION ON THE LABEL TEXT

- **Discussion paper** on FSC on-product labels: alternative wordings for the label text were discussed (2015);
- **Research** on consumer perceptions on FSC on-product labels in three markets (2016);
- **Impact assessment** on changing the label text (2017);



Together with the first draft of the revised standard, a discussion paper on FSC on-product labels was published for consultation. The paper proposed to change the MIX label text and provided few alternatives for new wording. Also a possibility of moving into only one generic label for all claims types was presented for discussion.

Certificate holders responded to the discussion paper stating a strong request for NOT changing the text, and at least conducting a study to determine whether the wording really is misleading for consumers and whether changing it would create benefits to justify the costs.

In 2016, a consumer study on FSC on-product label perceptions was conducted in three countries. Over 2000 consumers in the US, Germany and China answered the study. The key findings from the study indicate, that consumers overall have very little awareness or understanding of difference of FSC label types, and they are not really looking for that information on them either. The MIX label was rated as less clear as the other two, and described as rather vague. Changing the label text into something like "responsible use of forest resources" or "from certified and **controlled sources**" could increase the clarity of the label. On the other hand, when asked about terms like "certified" and "controlled", it was not clear for consumers which one of them has a stronger system behind them.

As the label is now, while considered vague, was not considered clearly misleading by

consumers, and the assessed costs of changing the most widely used label on the FSC products was not considered to be justified by the benefits that could be achieved by changing it.

This was the starting point for the second consultation, proposing not to change the label but to provide better information about the system online. In addition, the revised standard provides guidance with promotional descriptions of products with particular labels, for example by reminding that when specifying the material in more detail, all sources shall be mentioned. Also ready-to-use descriptions are available.

The proposal not to change the label text was strongly objected to, and now a group of environmental and social chamber members addressed a letter to FSC, arguing that the issue of the text is a matter of principle that cannot be revoked.

Proposal submitted to Policy and Standards Committee and to the Board:

- Proceed with revision of 50-001 without decision on the MIX label wording in order to ensure improvements on operational side of the standard
- Decision of the wording linked to the controlled wood strategy process
- First discussion as side meeting in the GA 2017
- Ensure sufficient transition period for use of the existing label

So, given that we had taken two different approaches to the matter without being able to find an agreement among stakeholders, we proceeded with an alternative route.

The draft standard was submitted for approval by first Policy and Standards Committee and then the Board without the final decision on the MIX label text. This was done to enable implementation of less controversial operational improvements for certificate holders without further delay. The policy and standards committee has agreed to recommend this approach for approval, the board decision is still pending, waiting for next possibility for them to discuss it.

How about the label text decision, then? This is proposed to be linked with the development of the controlled wood strategy. The next discussion will be in a side meeting at the FSC General Assembly in October in order to find a route for the final decision.

Next I will hand over to William, who will explain the controlled wood system in more detail.



Now I'll hand over to William to explain the Controlled Wood context

What is “controlled wood”?



Uncertified material to be used in the FSC Mix products

So, what is controlled wood in all of this?

As mentioned earlier by Lucia, FSC Controlled Wood is material that can be mixed with FSC certified material in products that carry the FSC Mix label.

Not just any material can be mixed, however. There are rules for what cannot be mixed, and we refer to these as **unacceptable sources**.

The 5 unacceptable sources are ...



Rather than stating what is acceptable, our requirements list what is unacceptable, so that everything not falling in unacceptable category can be used.

There are 5 major categories of unacceptable sources:

Wood harvested illegally;

Wood harvested in violation of traditional and human rights;

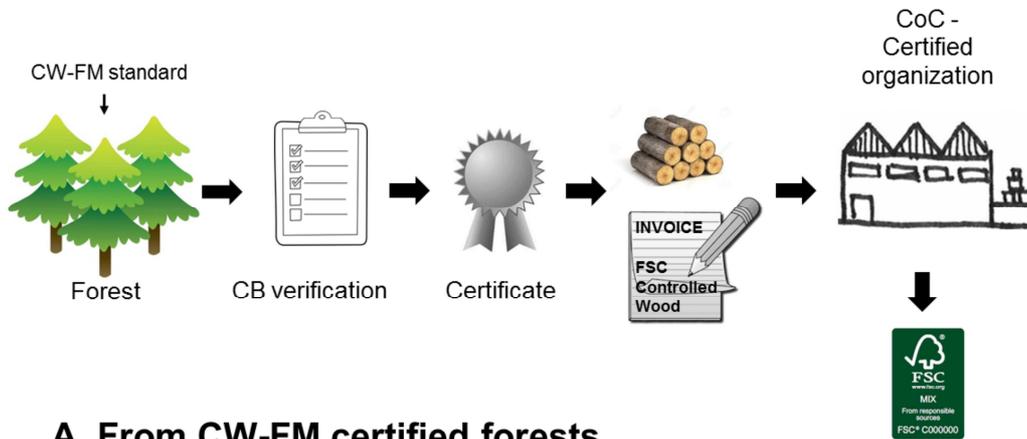
Wood from forests in which high conservation values are threatened by management activities;

Wood from forests being converted to plantations and non-forest use; and

Wood from forests in which genetically modified trees are planted.

Many stakeholders have different expectations and understandings of what exactly should be accepted or not accepted over the years. This has led to a strong polarization of opinions and one must be aware that controlled wood is one of the most controversial and critically discussed components of the FSC system.

Where controlled wood comes from?



A. From CW-FM certified forests

There are two options for establishing whether given material can or cannot be used as controlled wood.

Option A is through controlled wood forest management certification. This certification process is very similar to certification according to FSC Principles and Criteria, where **forest managers** must implement the standard. But instead of following national standards for forest management, they implement the less demanding controlled wood standard.

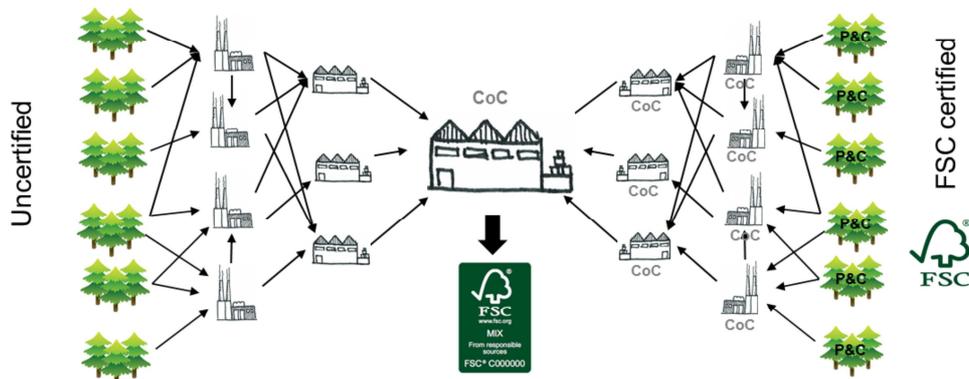
Afterwards, the certification body evaluates manager's compliance against the standard, and based on the compliance, the certificate may be issued.

Such certificate holders may then sell timber as FSC Controlled Wood, but only to another FSC certificate holder. This timber cannot bear any FSC label, nor can the seller promote controlled wood certification.

Further down the supply chain, the recipient of the material may either trade it further or use directly in FSC Mix products.

This type of certification, controlled wood forest management certification, is not widely implemented. Only a few certificates have been issued globally.

Where does controlled wood come from?



B. From forests assessed through CoC due diligence

Option B is through controlled wood chain of custody certification.

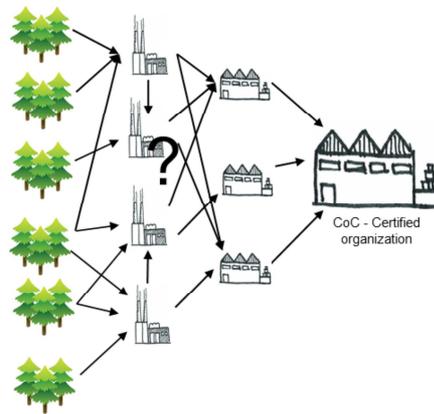
Most commonly, assessing material as controlled does not take place at the forest level, but in the chain of custody, by those CoC certificate holders who transform the wood, somewhere down the supply chain.

To manufacture Mix products, certificate holders obviously need certified material too, delivered through a certified supply chain, where every entity involved holds a chain of custody certificate.

In most cases, the supply chains delivering uncertified material are very complex and verifying every single forests as to whether timber is acceptable or not is not possible. Often the certificate holder who assesses their supply chains does not even know where every single forest is located within a country-wide supply area.

Therefore, other tools rather than verifying each forest are needed. These tools are part of a due diligence system.

What is due diligence?



Information
Risk assessment
Risk mitigation

So, what is a due diligence system exactly?

A due diligence system is a mixture of various steps, procedures, and means of verification covering the supply chain as a whole in order to minimize the risk of using unacceptable material.

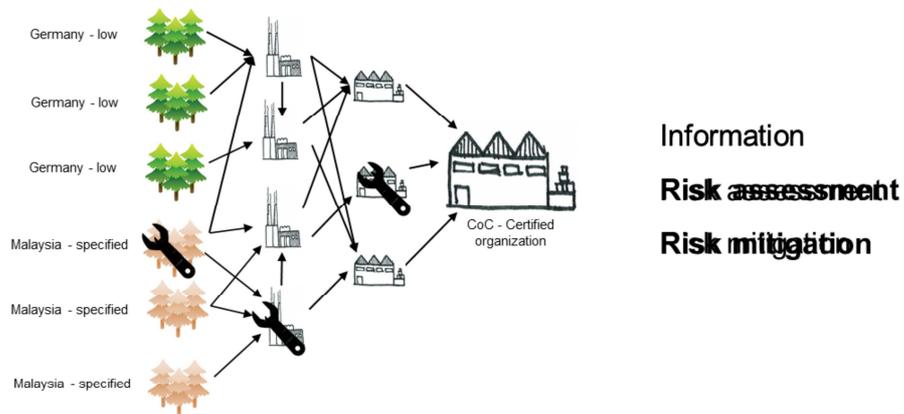
We can divide a due diligence system into three main components, which complement each other.

First is collecting information, focusing on direct suppliers.

Then is comes risk assessment. Risk assessment is done separately for the source forest and the supply chain.

The final component is risk mitigation; the steps taken to minimize or avoid any risks identified in risk the assessment.

What is due diligence?



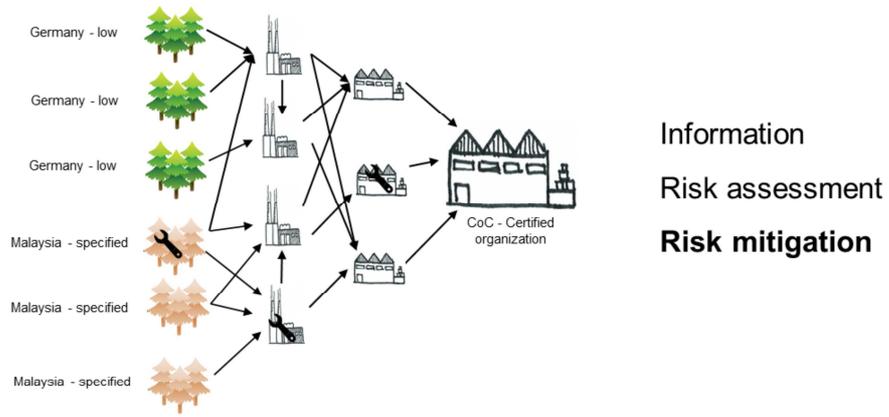
Performing a risk assessment involves designating low or specified risk for a number of indicators, as provided in FSC standards and procedures.

It is a study, where designation of risk is done based on publicly available information and expert input, ideally verified by national consultation. Typically the risk assessment is done by FSC, and usually it covers the whole country.

When risk is identified, extra effort is needed to source controlled wood from such an area. This is part of the third component of the due diligence, namely risk mitigation.

Mitigating risk may involve interventions both within the supply chains and at the level of supplying forests. In the latter case, exact location of those forests must be known.

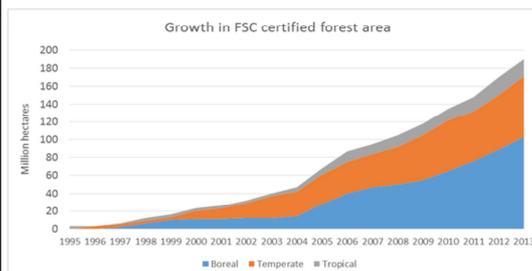
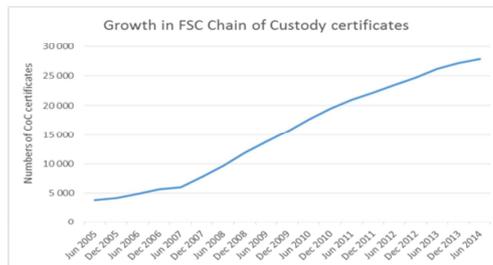
What is due diligence?



If the mitigation is successful, material can be used as controlled.

Why are mixing and controlled wood important?

According to many certificate holders, controlled wood or mixing creates demand for certified material



FSC Mix products currently generate large part of FSC income

(Estimated value of FSC Mix claims in 2014 was 250 Billion USD, and the value of FSC Controlled Wood claims 110 Billion USD).

The value of FSC 100% was only 30 Billions USD).

You may be asking yourself, “Why is controlled wood important for FSC?”

According to many certificate holders, mixing and controlled wood creates demand for certified material which in turn increases the area of certified forests.

Certificate holders in paper/pulp industry state that mixing is the only thing that allows them to participate in FSC at all. This is because they could not otherwise keep FSC 100% material separated due to significant logistical costs, as we heard from Lucia earlier. At the same time there is not enough certified material on the market to fully utilize the available controlled material supply.

This situation creates a special condition for those industries, because anything that is uncertified should be entirely FSC controlled wood to avoid segregation. If it is not, FSC certified material is contaminated and the whole production loses certified status. This is how certificate holders explain that allowance for mixing increases their demand for FSC certified material.

While we do not have direct data about volumes of controlled wood and we can only operate on estimates, the most recent study in 2014 shows the value of FSC mix and FSC controlled wood claims is significant and generate large part of FSC income.

Given the importance of the for maintaining the scale of FSC operations, as well as polarized views on what shall be allowed as controlled wood or not, there are many challenges related to the performance of the system on the ground. The credibility of controlled wood, and therefore

FSC Mix label, is being strongly challenged by many.

Therefore, there are number of processes and activities related to controlled wood taking place, to address past and current challenges.

What's going on around controlled wood?

- Controlled wood strategy being developed
- New standard is being implemented
- FSC works on risk assessments



Mixing allowed FSC to grow, but now, how are we going to proceed?

To answer this strategic question, among others, the controlled wood strategy process is taking place. The process looks beyond the current system, and aims at establishing strategic direction for FSC Mix products in the short-, medium-, and long-term.

Apart from the strategy process, the current system implementation continues, as work by FSC on risk assessments. Both of these are directly related to and relevant for the current mixing model.

Controlled wood strategy being developed (1)

- Long term future (2035)
- Should mixing be kept in FSC? → Whether or how to phase out controlled wood?
- How to get more certified forests and enable access for smallholders?
- How to enable sourcing by paper or pulp industry?
- How to ensure growth of FSC?
- More details [HERE*](http://ic.fsc.org/en/what-is-fsc-certification/controlled-wood/controlled-wood-strategy)



*<http://ic.fsc.org/en/what-is-fsc-certification/controlled-wood/controlled-wood-strategy>

First, the strategy aims to determine whether we still need mixing to achieve the ambition from the global strategic plan. Furthermore, it aims to determine how to increase certified area, and how to address smallholder access to the system and others.

Controlled wood strategy being developed (2)

- 2013: Decision to develop the strategy after finalizing M51
- 2015: CW strategy embedded in the global Strategic Plan (by the end of 2016)
M51 finalized
- 2016: Formulating key questions to the strategy
6 Regional meetings with Members
Online survey
- 2017: Global meeting (February/March)
Public consultation
General Assembly
- 2018: Future Search for Controlled wood



<http://ic.fsc.org/en/what-is-fsc-certification/controlled-wood/controlled-wood-strategy>

The strategy process has been decided upon in 2013, but only started in 2016. So far it has included a series of engagement events for Members, and an online survey and public consultation open to all parties.

The process looks at the system as a whole, not only focusing on controlled wood. To ensure that all perspectives are considered, FSC will apply a special methodology at the final meeting planned in the process next year, called Future Search. The key principle of the methodology is to ensure representation from all stakeholder groups affected by mixing. This means not only FSC Members and network partners, but also non certified suppliers, representatives from governments, or global policy makers.

During the upcoming General Assembly (GA), we will hold a side event on this process in the form of a fish bowl discussion. Meanwhile, we encourage you to visit our website for more educational materials and details on the process.

New standard is being implemented

- Result of Motion 51 (2011) „Strengthening the controlled wood system“
- Approved in November 2015
- Transition period until end of 2017



While controlled wood strategy looks into the future, there has been lot going on in the past years, to deal with the credibility of controlled wood.

A number of controlled wood standards and procedures were revised between 2013 and 2015, including the key controlled wood standard for chain of custody (FSC-STD-40-005).

These revisions were the result of Motion 51 from the 2011 GA asking for strengthening of the controlled wood system, including replacing risk assessments done by certificate holders with FSC risk assessments.

From its publication in December 2015 until the end of 2017, the certificate holders have time to implement the new standard. Many certificate holders were postponing the implementation and are only now are in the transition phase.

The new standard introduced major changes, which increase implementation efforts. It also requires greater stakeholder engagement in the certification process. Due diligence components described earlier (collecting information, risk assessment, and risk mitigation) are directly reflected in the standard.

FSC works on risk assessments

- 7 approved, 51 ongoing processes by the end of 2018
- Either national risk assessment (NRA) or centralized national risk assessment (CNRA)
- Different levels of engagement with national stakeholders
- Detailed timelines for each process established with network partners and/or consultants
- Details on progress and risk designations [HERE](#)

(<https://ic.fsc.org/en/what-is-fsc-certification/controlled-wood/risk-assessments>)



While certificate holders are implementing the new standard, FSC is working on providing risk assessments to phase out risk assessments developed by certificate holders.

FSC is conducting risk assessments for a total of 58 countries.

7 of these assessments have been approved in 2017, while 51 processes are still ongoing. There are two different types of risk assessments: national risk assessments (NRAs) and centralized national risk assessments (CNRAs).

Network Partners, where present, were given the opportunity to choose between three different engagement scenarios to conduct these assessments. Where network partners are not present, FSC conducts a CNRA on its own.

All processes need to be finalized and risk assessments approved by the end of 2018.

To obtain a progress overview per country, update on approved and upcoming risk designations, or to download approved or draft risk assessments, please visit our websites.

FSC works on risk assessments (2)

CNRAs approved for: Belgium, Bulgaria, Denmark, Ireland, Lithuania, Slovakia, Viet Nam

	By end 2017	By mid 2018	By end 2018
NRA	Ukraine	Austria, <u>Brazil</u> , <u>China</u> , <u>France</u> , Georgia, <u>Germany</u> , Italy, Japan, Norway, Portugal, <u>Russia</u> , South Africa, Spain, Uruguay, <u>USA</u>	<u>Canada</u> , Ecuador, Luxembourg, Netherlands, United Kingdom
CNRA with network partner engagement	Belarus, Estonia, <u>India</u> , Romania,	<u>Chile</u> , Czech Republic, Finland, Guatemala, Indonesia, New Zealand, <u>Sweden</u> , Switzerland	<u>Australia</u>
CNRA without network partner engagement	Laos, Latvia, Republic of Korea	Malaysia, Myanmar, Poland, Swaziland, Turkey	Argentina, Bolivia, Colombia, Honduras, Hungary, Mexico, Papua New Guinea, Peru, Slovenia

* priority countries are underlined

This overview shows that, so far, centralized national risk assessments for the following seven countries have been approved: Belgium, Bulgaria, Denmark, Ireland, Lithuania, Slovakia, Viet Nam.

Still ongoing are 51 risk assessment processes captured in the table below. We have separated these processes by risk assessment type: NRAs in the top row, CNRAs with network partner engagement in the middle row, and CNRAs without network partner engagement in the bottom row.

For each of these assessment types, we have grouped the countries by planned approval time: this year, mid-2018, or the end of 2018. The underlined countries are the 13 priority countries which received funds explicitly dedicated to the development of risk assessments.

As you can see, roughly 25% of the risk assessments are expected to be approved in 2017, almost 50% are scheduled for approval in the first half of 2018 and the remaining will be approved in the last two quarters of 2018.



Wrapping up

Forest Stewardship Council®

- Webinar has been recorded
- Please enter questions you may have in the webinar software now, and we will answer as many of them as possible
- Join us at the GA!
 - Controlled Wood strategy – Tuesday, 10th October, 9:00-10:30
 - FSC risk assessments and the standard – Tuesday, 10th October, 16:00-18:00
 - Communicating about mixing of materials in a product – Wednesday, 11th October, 9:00-10:30

Our contact details:

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- Joanna Nowakowska (Controlled wood) j.nowakowska@fsc.org



Thank you for attending the webinar on the rules behind FSC Mix and Controlled Wood.

This webinar has been recorded and will be available on the Membership portal, the controlled wood website, and the chain of custody website soon. Please join us at the GA during the side events on the slide.

We'll now take your questions and begin answering them in the order in which they are received. If you have questions afterwards, you are also invited to send them to us via e-mail.



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