



# - FSC CONSULTATION PLATFORM -

## RESULTS

**PROJECT CERTIFICATION: STANDARD FOR CERTIFICATION BODIES**

**GENERATED: 14/01/2019 | USERS PARTICIPATING IN THIS CONSULTATION: 10**

## Country

United States

30%

Russia

10%

Switzerland

10%

Germany

10%

United Kingdom

10%

Brazil

10%

Peru

10%

France

10%

## Which of the following best describes you?

Certificate holder

30%

Certification body/auditor

30%

FSC Network Partner staff

20%

FSC Member

10%

Consultant

10%

## If you're a member, please specify your chamber

I am not an FSC member

40%

None

30%

Economic North

20%

Social South

10%

**Do you have any comments about this section of the standard? Please provide a reference (indicate the paragraph, line, clause or sub-clause you are referring to), otherwise we may not be able to consider your comment in this consultation.**

Responses: 2

no

It is all OK! Very good

**Do you have any comments about this section of the standard? Please provide a reference (indicate the paragraph, line, clause or sub-clause you are referring to), otherwise we may not be able to consider your comment in this consultation.**

Responses: 2

no

Ninguna

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Responses: 1

I am good with this

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Responses: 1

this is ok

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Responses: 1

ok

**Do you have any comments about this section of the**

**standard? Please provide a reference (indicate the paragraph, line, clause or sub-clause you are referring to), otherwise we may not be able to consider your comment in this consultation.**

Responses: 2

CoC definition is inconsistent with other documents, it is also potentially misleading as ownership can be transferred prior to harvest. 'Chain of Custody certificate' - are there 4 types or 6?

I am in favor

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Responses: 3

'False claim' / 'Fraud' - mislabelling now not covered - should be added in its own right or included in the definition of a false claim. 'FSC controlled wood' - should be more widely consulted upon with relevant stakeholders, introducing this change as part of the project consultation is not transparent.

FSC Controlled wood: should be considered Certified, but in business to business discussions only

I'm curious why fraud was removed, though I can see how false claim covers all categories, without implicating intention.

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Responses: 3

'Project' and 'project member' see comments under project certification standard and note that this will need adapting for 20-011 from 40-006.

I would allow single production batches

Project definition - The definition uses the standard as a reference. I think it would make more sense to change this sentence to read. "the term project does not apply to single production

batches in industrial manufacturing of forest based products (example) as these are covered under a normal chain of custody certification.

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Responses: 1

no changes

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Responses: 2

1.1. b - Control system/ management system is not adequately explained in project standard (in order to be assessed by CB under this standard)

c) you ban controlled wood from the process, but an interview is good enough to prove scope. That seems out of sorts

**Do you have any comments about this section of the standard? Please provide a reference (indicate the paragraph, line, clause or sub-clause you are referring to), otherwise we may not be able to consider your comment in this consultation.**

Responses: 3

2.2 b - missing 'project type'. 2.4 - define 'management system'

ok

No comments

**Do you have any comments about this section of the standard? Please provide a reference (indicate the paragraph, line, clause or sub-clause you are referring to), otherwise we may not be able to consider your comment in this consultation.**

Responses: 4

2.6 - 'critical control points' and 'corrective action requests' are not terms used in project standard.

good

Own sites for storing are currently treated differently compared to a storage which is run by a subcontractor. If a subcontractor runs a storage for finished and labelled products, it would result in low risk and no on-site audit would be required and take place. Comment: Align the requirements for on-site audits, no matter if the storage is company owned or is run by a subcontractor.

Does the certification body select a sample of sites in a multi-certification projects or does the CB shall perform audit on each site ?

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Responses: 4

2.6 h - not relevant to project certification. 2.6 h i - no mention of 'outputs' is this correct?. 3 - how does this relate to projects?

ok

Clause 3.2: could you specify if project certification requires surveillance evaluations and if the project certification is valid for 5 years? It seems to me that 5-year period does not apply in case of a project certification. If it applies please indicate if it's relevant for all cases (e.g. probably it's excessive for a booth or a boat) or only for some (e.g. for a building). But anyway this requirement might influence the demand for project certification, because paying every year for a surveillance audit is definitely a burden for small-project certificate applicants (e.g. private houses, booths, boats, musical instruments etc). This shall be spelled out in the FSC-STD-40-006 as well.

FSC itself says constantly that they are highly concerned about empty certificates. This revision of the standard is the perfect option to delete clauses 3.3 3.4 and 3.5 from the standard, the waiving of audits. The current clauses leave many resulting questions and options unanswered and constitute the opposite of what is said by FSC officials for years. If companies have indeed no FSC business they can always cancel their certificate and again enter the system as soon as FSC job orders are in sight. Today, FSC has no overview how many and which audits are waived. Comment: Delete clauses 3.3 3.4 and 3.5

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Responses: 2

3.6 a - change to 'in their due diligence system, if applicable' and confirm if this means CW, PfA or other DDS. 4 - how does this relate to projects?

I would remove this statement based on the fact that some subsystem change rapidly and often. by the time a certification body sees one change and reviews, 2 more may have happened.

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Responses: 2

Box 1 a - for projects, whose responsibility is this? 4.6 note - why change this? What about projects?

ok

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Responses: 2

Section 5 only relates to project certificates covering more than one project. What are the requirements for a single project? Given the claims that can be made, surely each project should be audited? Is it appropriate to sample projects at all? Graphic 1 - see project standard comments.



looks good

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Responses: 2

As previously stated. Each project should be audited. 5.2 - how can this be both random and specific? 5.5 - is this ok for projects? Isn't the main evaluation at the end for projects?

d) deemed relevant by the certification body & the project manager. I am thinking safety, If a certification body or auditor decides they want to see a site, the project manager should make sure the auditors safety is not at risk.

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Responses: 2

ok

A coc certified builder is contracted by a project certified organization(s) for multiple projects. Pre-fabrication of building elements is done at the builder`s premises, installation/assembly is done at the projects` sites. Will the builder`s CAB have to visit a sample of project sites or is it enough to assess the coc conformity of the pre-fabrication processes at the builder`s premises, since the project certified organization`s CAB will audit the installation process? If not, how can double auditing of the installation process be avoided?

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## **comment in this consultation.**

Responses: 2

6 - fundamental changes such as these should be more widely consulted upon (not just under project consultation). Note - is this correct and reflected in CW standard? 6.1 a - NPs don't get this. 6.1b - where are consultations advertised?

ok

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Responses: 1

ok

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Responses: 1

ok

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Responses: 1

good

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Responses: 2

6.15 note – send to who at FSC - PSU?

good

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Responses: 2

7 - How does this apply to projects? How or why is it different to clause 5?

good

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Responses: 1

ok

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Responses: 1

ok

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Responses: 2

8 - Make clear who is being evaluated e.g. in project scenario. 9 - How does this relate to projects?

good

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Responses: 1

good

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Responses: 2

10.18 b - small but significant change which should be more widely consulted upon

ok

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Responses: 2

11.4 - should this be deleted? Is it in line with requirements elsewhere?

looks good

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Responses: 2

2 e iv - current AAF policy will need revision in line with new project requirements

ok

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Responses: 1

very good

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Responses: 2

Table B - what about outsourcing under project certification?

remove f.

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Responses: 1

ok

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Responses: 1

ok

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Responses: 1

ok

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Responses: 1

ok

Responses: 0

Responses: 0

Responses: 0

Responses: 0

Responses: 0

Responses: 0