



- FSC CONSULTATION PLATFORM -

RESULTS

PROJECT CERTIFICATION: STANDARD FOR CERTIFICATE HOLDERS

GENERATED: 14/01/2019 | USERS PARTICIPATING IN THIS CONSULTATION: 32

Country

United Kingdom

16%

United States

16%

Netherlands

6%

South Africa

6%

Japan

6%

India

6%

Italy

6%

Zimbabwe

3%

Argentina

3%

Portugal

3%

Kenya

3%

France

3%

Germany

3%

Brazil

3%

Finland

3%

Cameroon

3%

Switzerland

3%

Mexico

3%

Russia

3%

Which of the following best describes you?

FSC Member

31%

FSC Network Partner staff

22%

Certification body/auditor

22%

Certificate holder

16%

Consultant

9%

If you're a member, please specify your chamber

I am not an FSC member

38%

None

28%

Environmental South

9%

Social South

9%

Economic South

6%

Economic North

6%

Environmental North

3%

Do you have any comments on this section of the standard?

Responses: 14

I feel comfortable with the entire content

-- "the organization may choose to only become certified for the duration of the project or to retain certification for managing future projects": What is the key difference? Does this mean that a single certificate issued to an organization can be applied to several projects without a specific project being audited? What does this mean for the assessment cycle if an organization chooses to remain certified instead of for just the project? -- "Full project certification applies to projects where 100% of the forest-based inputs used come from FSC Certified and/or post-consumer reclaimed inputs": So projects that include "FSC Controlled Wood" inputs cannot be considered for full project certification. What is the value of making this distinction? This may end up in fewer full project certifications.

1. I don't think 'object' is a good word to use here, although I do not have an ideal alternative - perhaps 'structure' would be better, and make it clear that objects such as furniture or musical instruments (however unique) are not intended to be included - unless these type of items are considered. When we mention boats and carved sculptures, there is little difference. 2. Retained for managing future projects: does this need to specify a time factor? I am coming back to the idea of one-off certification although this can be for a group of for example housing developments on different sites. For completely different projects with undefined time intervals, there are so many possible variables in terms of suppliers, type of project, different project members and their training needs, that it is just as easy to consider it a new project.

No comment

The distinction between certification to this standard and certification to FSC-STD-40-004 is not clear. The proposed change from the current situation, where it is the project that is certified, to the proposal that the organisation is certified is confusing. This is an issue throughout the document. The research undertaken by FSC UK for PSU in 2015 did not establish a demand for such a change and we are unclear of the rationale behind it. The feedback received from those that have experience of project certification (in the UK and in other countries) was that the existing standard is relatively straightforward and that any revision should ensure that the standard remains brief, concise and straightforward. FSC's global plan also calls for simplification. The draft under consultation seems more complicated. Unless there is a clear demand for "ongoing" project certification, which cannot be fulfilled by the current CoC standard

(FSC-STD-40-004), we would suggest that we revert to a standard for certification of "one-off" projects rather than the options proposed in this draft. There are construction companies that are certified to FSC-STD-40-004 and it may be preferable to add an annex to FSC-STD-40-004 to address any specific issues for such companies rather than changing the project certification standard to accommodate them. Specific comments: Define "set of similar or related objects". Paragraph 2 indicates that the standard may be used for a one-off project (as currently) but this is not reflected in the full standard (or associated accreditation standard draft). Paragraph 3 implies only two routes (full or partial) whereas three routes are described later. No reference to pre-consumer material (although it is mentioned elsewhere). No reference to other use of the trademarks (beyond "specific promotional claims") Is it the case that compliance with standard may provide the basis for independent, third-party verification to demonstrate compliance with Green Building specifications. Do we have any examples of this being the case? Is it appropriate to include this sentence? Objective: Presumably it should state "percentage or proportion" rather than "part"

how will it be possible to understand if a certificate is issued for the individual project or for the possibility managing future projects?

I support it

Certification may be for individual project & not for groups of projects.

Thank you for the opportunity to provide comments on the revised Chain of Custody Standard for Project Certification. There are currently very few projects in the US that are certified under the current 40-006 standard. There is a lack of demand for project certification and some of the current requirements are onerous. Some of the proposed revisions, specifically clause 4.3, will ease some of the barriers to project certification. I have a number of outstanding questions and concerns that should be addressed before the standard is finalized.

- Introduction, Paragraph 2 (in downloaded document) – This needs additional clarification or an example. This new requirement could deter organizations that do not want to maintain a certificate for five years. If a company chooses not to renew their certificate can they still make claims about the project? What is the difference between Chain of Custody certification with a project in the scope and Project certification? For example, FSC US has certified two projects and has a third in the works. Would our office need to maintain a certificate for five years in order to continue to claim these projects as certified? It seems like the original intent of project certification was to simply be a way for an organization to work with FSC-certified materials on a one-time project, call it a certified project and that is it. We recommend leaving the option for a company to make claims on a one-time project without the need to maintain a certificate.
- Part B, Scope: Could a company that is Chain of Custody certified to 40-004 expand the scope of their certificate to include project certification? There are some instances where this would be helpful to companies toward companies that manage building projects.
- Clause 4.1 – This assessment of claim-contributing inputs is inaccurate. Claim-contributing inputs is a defined term, it does not need quotes, and we cannot modify the definition as is proposed in clause 4.1 and the definition.
 - o Change FSC Mix >70% and FSC Recycled >70% to say FSC Mix x% and FSC Recycled x%. It doesn't matter what the percentage – FSC Claim-contributing inputs includes FSC Mix x% and FSC Recycled x% of any percentage level. This is not limited to percentage claims over 70%, that is the threshold requirement for labelling. The definition includes the following clarification: 'The amount of input materials received with an FSC Mix x% or FSC Recycled x% claims that count as claim-contributing input is proportional to the percentage stated on the supplier's sales documents (e.g. if 10 kg are received with an FSC Mix 70% claim, only 7 kg counts as claim-contributing input).'
- Clause 4.2.a – given the accurate definition of claim-contributing inputs, please reconsider the wording for what constitutes 'full project certification' – we suggest adding a clarification that all FSC Mix x% and FSC Recycled x% claims must be >70% in addition to is proposed. Suggestion: "...are claim-contributing inputs and all FSC Mix x% and FSC Recycled x% claims are >70%.
- Clause 4.3: Additional clarification should be added to this clause. Add a Note to define 'visible' and 'valuable' and how this will be verified. Additionally, more clarification is needed around the term 'average.' Is it the average of the entire project? Or the norm for the country, state, or region?
- If an organization contacts FSC to get a trademark license for promotional purposes about procurement for their building project, are we able to issue a license? Or would they be required to go through project certification? We highly recommend that they still have access to the trademark licensing program as long as they can provide proof that they are procuring FSC-certified materials.
- Definition of claim-contributing input – The proposed definition here is different than the one in the COC standard. That doesn't seem appropriate and will cause confusion. If there needs to be clarification that for project certification only percentage claims above 70% are accepted, then we need a new term or just to clarify that (see suggestions for clause 4.2.). I don't believe that these changes will drastically change the number of FSC certified projects without some other market push. Are there any other activities that FSC is planning that could help

drive value for project certification? Please contact FSC US with any questions about our comments. Thank you, FSC US Policy & Standards Team

En el tercer párrafo, después del primer punto y seguido dice: La corresponde a proyectos en los que el 100% ... Me parece que falta una palabra después de "La", quizá se referían a la "certificación total"

"...forest-based inputs used come from FSC Certified and/or post-consumer reclaimed inputs..." - it is not clear if Controlled inputs are considered as well. Later on in the standard it seems that they are considered, but why this is not mentioned in the Introduction explicitly? This phrase repeats later on in the standard. If corrected it shall be corrected through out the entire text.

No

no, although it seems too much focused on building sector

I would encourage being more explicit in defining what can be considered a "project" in FSC. E.g. the example of the standard not covering a batch run of furniture production, is not completely clear nor does it necessarily make a 100% sense. For example, for a small furniture producing company, whether it is a family owned business or a community project, a test run of what FSC certification would mean for them might be a good idea. Project certification could provide a needed platform for a test run. In the long-run, project certification for many batch runs does not make any sense because of the costs. If the current text implies that project certification is non applicable to only industrial scale batch runs, then it makes more sense. Nonetheless, I would encourage more detailed description for the definition of eligibility for project certification. Is sub-contracting still possible under the definition of the suppliers and service providers? I would want to see more detailed description for a industrial manufacturer of products. In many construction projects, there are company that operate on an "industrial" scale that provide specialized services. For example, there might be a company that normally manufactures wooden doors, cabinets, window frames etc. that are not FSC certified. They might also provide special laser cutting services on the side for construction projects. Would these kind of companies that physically modify the products in the construction project value be required to get CoC certified as per 40-004 or could they be included as project members to the scope of the project certificate?

The current version of FSC-STD-40-006 only applies to certification of single projects. The new draft standard allows not only the certification of a project, but also the certification of the organization that manages projects. This means that the certificate is issued to the organization that can opt to maintain the certification only for the duration of a specific project construction or to maintain it for several years. Also, the organization is allowed to manage and certify several projects. Do you support these changes?

Responses: 30

Yes

66%



No

22%

I don't know

6%

[Did not reply]

6%

The new draft standard can be applied by Participating Sites of Group or Multi-site CoC certificates. Do you support this change?

Responses: 30

Yes

66%

No

19%

I don't know

9%

[Did not reply]

6%

Do you have any other comments about this section of the standard?

Responses: 17

Re 'no' reply to ongoing certification - see response to previous question above, it is a conditional not absolute 'no'. There needs to be some similarity and continuity between the projects to enable ongoing certification - e.g. a chain of coffee shops. 1. 'Last entity in supply chain' - this needs to be re-worded to make clear that they are the last entity up to the point of constructing the project, so it is clear that houses etc. may be sold after they are certified. 2. Paragraphs starting 'This standard does not apply...' and 'Project members are not required...' - suggest reversing the order of these and changing the second to say 'Traders or manufacturers of standard production items (even if specially ordered for the project) are not eligible to be project members and are required to be certified according to FSC-STD-40-004'. Remove reference to customised or bespoke items as these should be eligible. There is otherwise not a clear auditable distinction between 'industrial' suppliers and (for example) joinery companies who are likely to be the main category of project member. 'Industrial' could mean anything - it sounds something like windows for factories as against windows for houses!

These are important positive additional elements which will be welcomed by the construction industry in the UK.

The difference between the usual CoC CHs would be complicated.

The difference between project certification and "normal" chain of custody certification is confusing, e.g. through terminology such as "want to become FSC Chain of Custody certified...." It is not clear to us why an organisation wanting ongoing certification could not do this under FSC-STD-40-004 if they wished (is it because they would like to include project members within the scope?) It is difficult to distinguish between what can be considered a project, e.g. a set of similar objects, and what cannot, e.g. a batch of furniture produced according to a customer's specification. How is ownership of a project defined? How is "last entity in the supply chain" defined? The organisations will, inevitably, be selling the "product" and the definition of "Chain of Custody" indicates that there is a change of ownership. Define "industrial" and "traders". It is unclear what is within the scope and what is not. Suppliers and service providers: The first sentence is unclear: is it only for customised/ bespoke material, regardless of whether it is purchased, produced or installed? This, along with the restriction for traders, is unclear. How do we define "customised/ bespoke"? The term "on site" is confusing as this could, presumably, not be on the main site (i.e. off-site). Graphic 1: It is confusing to call this "CoC certification" - should use different terminology. There is no graphic covering one-off project certification (as is currently the case). Have the implications on the AAF policy been considered? It should be made clear that current applicant projects do not need to transition to this standard. Why is FSC-STD-40-003 referenced in Table A?

NO

it should be better specified in which cases an object can be certified for project certification. For example, in Italy we have a design certification for a guitar. This project certification is valid because the person who requested it is the owner. This does not mean that all guitars can have the project certification. In fact, those who produce guitars could be certified for the COC, just like a carpenter who makes custom furniture.

I support it

Giving blanket certificate to organisation for all its projects may lead to fall in quality.

Could a company that is Chain of Custody certified to 40-004 expand the scope of their certificate to include project certification? There are some instances where this would be helpful to companies toward companies that manage building projects. Also see comments on Introduction.

These changes make the project certification very complicated. It should be kept as simple as possible. Project certification is usually for those which do not CoC certificate. They do not want any complexity in the standard.

The difference between a project member and a supplier is not clear to me.

1. "... managing projects that use FSC-certified and/or reclaimed material/products..." why Controlled inputs are not explicitly mentioned? Please include them as well, because not mentioning it in the beginning of the standard implies that they are not used at all, which is a significant difference compared to the previous version of the standard. 2. It will be very useful to include more information about suppliers and service providers that shall (or shouldn't) be included in the scope, with more examples (e.g. if they assemble, transport, paint and etc. shall they all be included?) 3. What if the applicant goes to a retailer and buy an FSC cert. material in a box with FSC label, but the retailer is not certified. Is this possible? Or shall the applicant purchase materials only (!) from certificate holders, while purchase from a retailer of a given end product is not acceptable? This might be a case for construction of a single house, when an interested person would like to build a certified house for personal needs. Some items might be purchased in a regular shop. Please specify it in the standard. 4. The pictures do not seem to be very explanatory and relevant on this page. Acronym "CoC" is not explained anywhere in the text.

Clause The suppliers and service providers: It would be great, when our suppliers and subcontractors, like the carpentry or staircase factories, would be able to certify to this standard. They experience the same amount of administration as we do. A lot of our suppliers/subcontractors consider for this reason a STIP-certification.

There is already considerable confusion regarding certification in the supply chain - a construction company could theoretically hold both CofC and Project Certification, and an Architect could hold Project Certification - this raises expectations from a client that they are working with an FSC Certified Company. Many consumers believe that when they buy timber from a company

that holds FSC CofC certification, that all the timber that that companies sells is certified. It will be the same with Project Certification, an organisation will hold the FSC accreditation but only a small % of the output will be certified.. This will damage the reputation of FSC and will weaken the "brand" image.

The definition in the standard is clear but in the standard for certification bodies was less clear. The definition in the evaluation standard should be clarified to mimic the project certification standard.

Even though I already like the graphics, I would want to see a more thorough description of various options for using the project certification standard. Construction projects are the most common place to use this standard and they might be certified according to a pull from the owner of the project or as a push from the developer or construction company. I would want to see a more specific breakdown of different scenarios of how project certification could be obtained as per the driver for certification. I would also include an example of a non-construction related project certification case.

Perhaps limited the use of such certificates only to organizations that are engaged in the certification of several projects

Clause 1.6 does not require formal training to personnel of project members and participating sites, but only instructions to be provided. Do you agree with this requirement?

Responses: 28

Yes, but it remains important to ensure mechanisms of control of the performance and adequateness of those instructions

Yes.

No, 'instructed' should be changed to 'trained'.

Yes, in our experience the training should be tailored to match the needs of the trainees.

Maybe this would be the reality. If the project draw much attention, the members's awaress would increases as well?!

This is in line with FSC-STD-40-004

No. Formal training is required.

yes, I agree. It would be better specified what "instructed" means directly in the point 1.6.

yes

Yes

No estoy de acuerdo, me parece que la organización si debe asegurar que su personal esté capacitado

Yes

yes

Yes

Yes

Yes

Yes

Instructions should be adapted according to the complexity of the work of the personnel and the size of project. STD text: ... add "appropriate" instructions should be provided. Auditors should verify that the personnel have achieved the relevant competence and experience according to the size and complexity of the work/projects.

Yes

No - the issue is whether the relevant people are competent and have adequate knowledge. FSC continues to be focused on the process NOT the outcome. . Simply rewrite the requirement - The organisation shall ensure that relevant personnel are competent in implementing the applicable COFC requirements.

Yes, where no skills certification is applicable

yes - given that project management is different than chain of custody certificates this makes complete sense and it should be acknowledged that the ability to impact with both project checks and instructions is enough to impact a certified project.

Yes, I agree, this aligns better with the reality of how the projects are organized and given the nature of the business transaction (e.g. material sourcing is likely controlled by the project manager and not the project members) there is low risk of mixing. However, FSC might consider adding a requirement for the project mgr. to have procedures to control leakage and mixing during all critical points of material handling.

I agree with this clause, as it intends to allow more flexibility in how and what is deemed necessary for the personnel.

Yes

No,some basic training is recommended

Yes, as long as this instruction contains sufficient detail to ensure certified timber is delivered.

No, a minimum of training on FSC politics and main requirements should be mandatory

Clause 1.7 specifies all the records that shall be maintained and audited by certification bodies to confirm that materials used in projects are certified or reclaimed. Do you agree with these requirements?

Responses: 28

Yes

Yes.

Yes, but no need to specify 5 years, only until the project is completed. Just from a practical point of view, we as CB are not going to be asking for records after completion. And here it mentions training records, suggesting that 1.6 should say 'training'.

The way the clause is worded would suggest that the company does not need to keep a record of all FSC certified inputs but instead could hand hundreds of invoices to the CB for them to calculate the percentage. We suggest that it is made clear in the clause that the certificate manager can or should maintain a database of all eligible inputs which can then be audited by the CB by cross-referencing to corresponding documentation. Most of our clients would choose this option as they have invested in and already operate sophisticated raw material monitoring databases covering all material arriving at site, not just timber. We also disagree with the use of cost as an indicator of compliance no other FSC standard uses this as a unit of measurement. Why the exception here? it seems a bit inconsistent with other FSC standards.

Yes.

FSC-STD-40-004 does not require the retention of the trademark licence agreement. No reference to non-confirming products. Not all projects will have records on reclaimed/controlled material.

Yes

yes. If formal training is no longer mandatory, I would remove "training records" as documents to be archived.

yes

Yes

Si estoy de acuerdo

Yes

no

Yes

In my opinion can be excluded: 1) "signed copy of Trademark License Agreement" - it can be managed by CBs; 2) "complaints" - see below 3) in the phrase "due diligence program for controlled material and FSC Controlled Wood" I'm not understanding why DDS is necessary if a material is FSC CW claimed. Should be just if controlled material.

Yes

Yes

In general: Suppliers invoice AND delivery documents must be kept Exemptions: if outsourcing agreements are applied, only delivery documents and no invoices are required

yes

Yes

yes

yes

Generally, yes. The 5 year timeline seems a bit arbitrary, but I understand why FSC has chosen this timeline. It is not clear if this question is implying all records need to be audited (as opposed to the approach of document sampling), but this could be burdensome for larger projects.

Completely agree.

Yes

Strongly agree with the content of the clause

Yes, but is it necessary for these records to be kept for 5 years. Once the project is complete and certified, they should not be required?

Yes for sure

Do you have any additional comments about this section of the standard? Please indicate the clause or sub-clause you are referring to, otherwise we may not be able to consider your comment in this consultation.

Responses: 18

No

Add a clause 1.9 that states for organizations that manage multiple projects, where the CB samples projects to assess for conformance, the organization should be required to internally audit each project.

Do we have to include 1.8 for compliance reasons? It is highly unlikely to be relevant at the end user stage of a project and it just looks rather offputting for users of the standard.

No further comment

1. Title should be "Administrative requirements of the organisation" 1.1. 1.1c) Needs a comma after unique identifier to make it clear that the address is always required. Note - it is unclear how extensive these changes can be. Is it a requirement or an option to extend the project scope? Clause 1.3 refers to Clause 2.3, which does not exist. Clause 1.7 refers to Clause 2.1 but presumably this means Clause 1.1 Clause 1.8 include definition for "transaction verification" and "transaction data". How would you provide samples if already installed?

All references to clauses 2.1 and 2.3 are wrong. Forsi refers to exclauses 1.1 and 1.3.

its a bit wordy, but its good

FSc should not underatake resposibility of traing. All species are important from the point of biodiversity.

N/A

Note in clause 1.3 refers to clause 2.3. It looks like the reference should be made to 1.3. Clause 1.7 refers to clause 2.1. It looks like the reference should be made to 1.1.

1.2: In the case of an multi-site certificate, the signing of one self-declaration of the overall organization should be enough;

I know that 1.1.a) only list the standards as examples but for clarity I would include 40-006 the main standard.

1.2 - nowadays TLA includes the POA, can be removed; 1.3 - could include something about "legal work" - very important in construction scenario 1.4 - remove or include a kind of "mandatory public complaint channel"

Clause 1.1 a): there is a reference to FSC-STD-40-007 which in fact can be used only by certificate holders certified according to FSC-STD-40-004. FSC-STD-40-006 does not require certification according to FSC-STD-40-004. How does FSC-STD-40-007 shall be used in this case then? Please specify this in the standard. Clause 1.3, NOTE to the clause: please correct reference to clause 2.3. Clause 2.3 does not exist, it seems it shall be clause 1.3. 1.4 "applicable to the scope of the organization's CoC certificate" it seems that this wording refers to certificates obtained according to FSC-STD-40-004. It will help a lot if somewhere earlier in the standard it's explained what is meant -> does it refer to 40-004 or not.

Clause 1.5: I don't like, that in this version it is possible to buy materials at non-FSC-certified members. It's a lot of work to ensure, that a non-FSC-certified company is well instructed in the FSC-procedures, and it is a risk, that the procedures aren't followed properly. We will only use FSC-certified subcontractors.

Whenever possible, requirements should be as straightforward as possible as project managers are already managing a lot of different compliance and regulatory requirements. Perhaps FSC can consider rolling out a "handbook" along with this standard that includes everything a project mgr. needs documentation wise and helps them organize the documents for an audit.

No

Point 1.5 and 1.6 The organization shall also verified that the FSC-certified project members are compliant with the requirements : proof for documented procedures end competencies of their workers

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

Responses: 18

Nothing significant

2.1 "The project manager shall have demonstrated professional experience..." do you mean "certificate manager" here and "not project manager"? Are there different qualifications for project managers versus certificate managers? If so, this needs to be clarified.

this is fine.

2.1 What is the difference between the Certificate manager and the Project Manager - are they the same person? this section needs some clarity.

This is fine.

Need to define project manager

In the case of company or corporate a Corporate Social Responsibility (CSR) Manager should also be appointed by the organisation specifically for these project.

I support this

Only one person should be responsible for a particular project. Cos may appoint the same person for more that one project.

The title of Section 2 in the contents table is not the same as the actual title. In the contents table, it says "project manager". 2.1: It talks about "Certificate Manager" but a phrase "Project Manager" is also used here. It is very confusing. If project manager is the same as certificate manager, then the phrase "project manager" should be replaced by "certificate manager". If theya are different, then "Project manager" must be explained and defined. 2.2: If project manager is the same as certificate manager, then the phrase "project manager" should be replaced by "certificate manager". If theya are different, then "Project manager" must be explained and defined. 2.2: it is not clear if project managers are needed for each project or if one project manager can oversee all projects. Clarification is needed.

no

2.1 Solo se debería requerir competencia y conocimiento. No así experiencia en el manejo de certificados.

2.1 Appointed person must also have clearly demonstrated and documented, responsibility and authority to implement the requirements of certification

Clause 2.1: Could the clause simply state the project manager shall demonstrate knowledge and competence of managing the certificate and implement the requirements of the applicable FSC standards to the CB prior to the project acquiring a project certification applicant status?

No.

Clause 2.1 and 2.2 are agreeable to me

No

Ok, and also competencies in the field of the project (e.g. Buildings)

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

Responses: 16

No

No Comments.

this is fine as it is.

No comment

Fine.

3.1 Would an agreement also be required with a certified project member? 3.1c) The outsourcing criteria is unclear. Perhaps delete the second sentence or reword for clarity? 3.1e) Would the records also be shared with the CB? Perhaps good to clarify

I am good with this

NO

3.1 d-e - if FSC certified material is purchased in the retail store or if its quantity is rather small it might be very complicated to make the supplier (i.e. the project member) to accept this clause and sign an agreement. Thus a lot of FSC certified projects might never happen. Only big projects will have the possibility to survive. Please comment if this is an intention of the standard. If smaller projects are considered as well this clause shall be reconsidered.

Yes, please see my answer at clause 1.5. Using non-FSC-certified members will increase the costs, because of the possibility of an audit by our certification body.

Depending on the business relationships within a project, some of these requirements will be very difficult to comply with and may impinge anti-trust legislation.

3.1e: Wouldn't a requirement stating that the "project member shall share with the organization (or project manager) records of inputs, outputs, and delivery documentation associated with all materials covered by the agreement" be sufficient here.

No.

The content of clause 3.1 are okay

No

OK, no comment

Clause 4.2 specifies the possible claims on projects. Do you support this proposal?

Responses: 27

Yes

56%



No

22%

I don't know

6%

[Did not reply]

16%

Do you have any comments or suggestions for the improvement of the project claims specified in clause 4.2?

Responses: 23

Nothing significant

4.2 a: why are temporary construction materials included? If the material is no longer included as integrated material at the end of the project, then it should NOT have to be considered as a claim-contributing input in order for a project to reach full project certification. In addition, this could be very difficult to audit for organizations that manage and certify their own projects. Controlled Wood/controlled material should be allowed as a claim contributing input for full project certification.

Yes to a) and b), with reservations about c). However a) must make clear that only temporary timber that is actually purchased is considered here. I am unsure about the note due to the difficulty of calculating volume - e.g. timber is bought to make floors, cut to length and there are all sorts of offcuts and leftovers so although the volume bought can be recorded, the volume in the actual building would not be reasonable to be calculated. It's OK if we are talking about calculating based on inputs but not on final content. Suggest simplify, all FSC Mix %, Mix Credit or Recycled certified material counts equally for full certification. As in the UK at least, so much timber is downgraded by the supplier to FSC Mix 70%, it would make full certification impossible to achieve even with the best of efforts and intentions. It's not clear if the note applies to a, b and c, perhaps it should be divided amongst the claims as applicable.

We think the Note will cause some confusion. If product supplied with an FSC Mix % claim can only contribute its equivalent percentage towards the certified volume, this will mean that a project cannot ever achieve Full Project certification. In fact, under this definition this will only be possible if the project uses entirely FSC 100%, FSC Mix Credit or Recycled inputs. Since the vast majority of construction products in the UK are supplied with an FSC Mix70% claim this rule might need some clarification.

Research undertaken by FSC UK in 2015 for PSU indicated that there was little support for partial certification. There is a risk of FSC being used to "green-wash" particularly if the percentage is low (under 4.2c) or if the specific components (under 4.2b)) only make up a small proportion of the project. Recommend to only allow a) with a requirement for 70%, in line with FSC-STD-40-004 and b) (if there is sufficient demand for this) and to remove c). 4.2a) requires all forest-based material/products to be claim-contributing. Could you not have controlled wood as an input or FSC Mix as long as the 70% threshold was met? 4.2 c) Should reference pre-consumer wood?

Do you have to choose one between a), b) e c). b) and c) are only for parzial certification? To avoid confusion it is better that there is congruence between this clause and 8.3c. As specified in the NOTE "if 10 kg are received with an FSC Mix 70% claim, only 70% of the volume or cost count as claim contributing input", to have a Full Project Certification I must have input >99%? In this case is not true that FSC MIX and RECYCLED \geq 70% are a fully claim-contributing inputs, as instead can be deduced from clause 4.1

I am good

Consumers look only for FSC certificate. Prociding large categories of caerticates confuses him

Clause 4.2.a - given the accurate definition of claim-contributing inputs, please reconsider the wording for what constitutes 'full project certification' - we suggest adding a clarification that all FSC Mix x% and FSC Recycled x% claims must be >70% in addition to is proposed. Suggestion: "...are claim-contributing inputs and all FSC Mix x% and FSC Recycled x% claims are >70%.

Clarification on c) is needed. Does the percentage always have to be rounded down to a whole number? What should the percentage claim be if the actual calculation shows the percentage as 72.5%? Can organization claim smaller percentage than actual calculation if they wish? (e.g. 70% instead of 71% as it looks simpler).

In case of partial project certification for certain components there should not be an obligation to mention all the specific claims for the specific components as long as these are claim contributing inputs.

I suggest just 2 claims: Specific components and Percentage claims that can achieve "100%" if full project. Another idea is make it easier and substitute the percentage calculation considering all FSC certified material as "FSC" and allowing claims like "X% of all wood materials are from FSC or recovered sources". A percentage calculation will be almost impossible in a complex project with different components like windows and furniture;

In general I support the idea, but it is not clear how exactly this claims sound like and when they will be used? If this is for press and promotion then the wording is very much important and thus examples of these claims are needed in the standard. It's not clear who the % claim will look like - "this house is 70% FSC certified"? On one hand it give more freedom for the organization, but from the other side I/m not sure this message is clear and does not really weight that much, since the project is "incomplete" -> only 70%, not 100%. Please clarify what is the intention.

No

A maximum up 4% is acceptable. Will it be measured in "volume" or "weight"? And what was the reason to choose "value" as one criterion?

Un numero alto de opciones o categorías deterioran el valor de fsc100% cuando no existe una conciencia clara entre los clientes del significado de las diferencias. Las opciones reducidas y claramente diferenciadas ayudan a valorizar el esfuerzo de las certificaciones 100%

As with Mix there should be a minimum % for FSC Project certification.

Post consumer and preconsumer reclaimed are listed and in reality this standard is nearly impossible to follow for a project manager. It should be considered that these are removed from the project certification scope. This section needs to align closer with the current chain of custody standard and the facts that reclaimed manufacturing audits do not actually visit the source of reclamation at all times.

This clause explains how claims can be made, but not what the claims are. In the case of full project certification, for example, can the clam "FSC Certified building" be made? Or is it FSC Certified Project? With a tad more creativity there is an opportunity to construct claims that would resonate better withe consumer audience.

4.2b: Is the intention of the claims to be inline with normal FSC claims? In the example at the moment, there is a notion of FSC Mix 80%.

No.

The majority of timber arriving on construction sites in the U.K. will have a mix claim (usually FSC Mix 70%), so it is very unlikely a UK project will receive full project certification. Would prefer to see full project certification as being a minimum of 70% claim-contributing material. Also where a percentage claim is made there needs to be an option to allow other certification schemes (e.g. PEFC) to be accepted as part of the due diligence process to streamline the evidence gathering and auditing process.

The distinction between Credit and % is not understandable by a lot of people except FSC specialists or auditors. It's a source of confusion for the public. What is important is to distinguish 100%, Mix, recycled Quite the same for pre or post consumer ... if you want it to work, keep it simple

Do you agree with the proposal of allowing a maximum of 2% of non-certified and non-controlled components under the conditions specified in Clause 4.3?

Responses: 28

Yes

56%

No

19%

I don't know

13%

[Did not reply]

13%

Do you have any additional comments about this section of the standard? Please indicate the clause or sub-clause you are referring to, otherwise we may not be able to consider your comment in this consultation.

Responses: 21

No

4.3: clarify the basis on which the 2% is determined. Is this 2% of the total amount of wood/fiber used, or of that specific component? 4.3: how to assess conformance that the non-certified components "are not more valuable" than the average forest based materials? 4.3: please provide an exact list of components that could be allowed, not just examples. This could lead to a wide-range of components allowed across different CBs. -- Why is uncertified material allowed in full project certification, but controlled material/controlled wood is not? At least Controlled Wood is controlled, and it was previously allowed in full project certification.

4.3 Remove 'visibility' requirement as unreasonable. Not sure what 'wood nails' are - dowels? If they are wooden pegs as used in traditional wood framing, they are often visible as a design feature.

4.6: why only non-FSC certified members? Surely all members needs to do supplier validation? Note: Does this mean that FSC Controlled Wood CAN be supplied to projects? This needs more clarity to make this absolutely clear.

We've been hearing discontent from constructors regarding the inconsistent rule on making promotional claim between CoC certification and partial project certification. CoC certification does not allow FSC claims to be made for parts of a building (such as pillars, flooring, beam etc.), but such a claim can be done for a partial project certification. Ironically current CoC rule makes it very difficult for CoC certified constructors to claim the use of FSC wood, as the whole building (house) needs to satisfy the CoC requirements in order to make a claim. It is not allowed to make a claim for just a pillar of a house. However, it is allowed with a partial project certification.

4.1 As above, could you not have FSC Mix less than 70% as claim-contributing? 4.3 this is not in line with current FSC requirements and may damage the reputation of FSC. Requirement that these be "not visible" makes it seem underhand. Value is subjective and open to abuse. 4.4 Unclear 4.5 Remove reference to OCP and state "FSC" trademark portal. 4.5 First sentence is not in line with previous statement that non-certified project members can purchase. For the certification of the London Olympic Park there was an approved supplier list and all material was

sourced from these suppliers. It has been suggested that the standard could include a recommendation to develop such a list. 4.6 Could the current criteria for outsourcing within 40-004 not be used here (with amendments). This section is for non-certified companies and e) and f) imply that these companies can source non-certified material and assess this according to FSC-STD-40-007 or FSC-STD-40-005 - is this the intention? 4.6 Note: Is the purpose of this note to allow sale of FSC controlled wood by those certified against 40-004 to uncertified organisations? If so, this needs to be made much clearer – at the moment it is implied – please state clearly. Also, existing normative framework (i.e. 40-004) will need to be updated in line with above. 4.6 a) Eligible materials needs defining.

2% of what? Volume?

I would like 0 non controlled wood, and more controlled wood

A consumer does not understand these fine distinctions.

Clause 4.1 – This assessment of claim-contributing inputs is inaccurate. Claim-contributing inputs is a defined term, it does not need quotes, and we cannot modify the definition as is proposed in clause 4.1 and the definition. -Change FSC Mix >70% and FSC Recycled >70% to say FSC Mix x% and FSC Recycled x%. It doesn't matter what the percentage – FSC Claim-contributing inputs includes FSC Mix x% and FSC Recycled x% of any percentage level. This is not limited to percentage claims over 70%, that is the threshold requirement for labelling. The definition includes the following clarification: 'The amount of input materials received with an FSC Mix x% or FSC Recycled x% claims that count as claim-contributing input is proportional to the percentage stated on the supplier's sales documents (e.g. if 10 kg are received with an FSC Mix 70% claim, only 7 kg counts as claim-contributing input).' This means that technically a company could produce an FSC Mix 10% product, this product couldn't be labeled, but it still could have a claim and the buyer of this product could consider 10% of that product claim-contributing. 4.3: Additional clarification should be added to this clause. Add a Note to define 'visible' and 'valuable' and how this will be verified. Additionally, more clarification is needed around the term 'average.' Is it the average of the entire project? Or the norm for the country, state, or region?

4.6 note: The texts "it is acceptable that FSC-certified suppliers sell FSC-certified materials and products to project members under the scope of the certificate of FSC-certified projects" should be changed to " it is acceptable that FSC-certified suppliers sell FSC Controlled Wood materials and products to non-FSC certified project members under the scope of the certificate of FSC-certified projects."

Needs clarification 2% of mass/volume/value. visibility criterion should be canceled.

4.2 C: The difference between controlled material and controlled wood is not clear. The note in 4.2 contradicts with 4.1 where all FSC MIX x% and FSC Recycled x% is claim contributing. The consequence is that a project with FSC MIX X% can never have a full project certificate!

4.3 - 100% of inputs must be at least CW or recovered; exceptions like that will bring more complexity and in few years FSC will suffer pressure to remove it, like minor components in 40-004; 4.4 - If "under the scope of FSC certification" means just if Full project, can be a problem because recovered material will be not easy to prove legality from the origin. For all the other materials FSC (100%, Mix or CW) must cover legality. Considering POA must be applicable including in percentage projects, but is really impossible to check. I suggest to remove. 4.5 - must include the invoices FSC identification when receiving materials, like in 40-004 Req 2.3

4.2.a "including temporary construction applications" - does it mean that even during the construction process ALL the wood on the construction site shall be FSC (+2% of uncertified as stated in clause 4.3)? This is a rather strong requirement. How it will be monitored by auditors? This temporary structures/objects might not be on the place during the auditor inspections and information might be in the documents. It seems that this requirement is excessive and unverifiable. clause 4.6 NOTE: the note is not clear. "In the context of project certification, it is acceptable that FSC-certified suppliers sell FSC-certified materials and products to project members under the scope of the certificate of FSC-certified projects" - was it meant "sell FSC-certified and FSC controlled materials and products with FSC claims"? If so, then the wording needs to be changed.

I like the possibility to add a small percentage of non-certified components, because sometimes materials can't be delivered with a FSC-claim. It's however rather difficult to calculate this percentage used in a house with a lot of different carpentry. (roofs, stairs, windows....)

In regards to Clause 4.3, I agree with the 2% threshold of non-certified inputs, however, I also suggest that the project manager should be able to demonstrate due diligence that these components were not available as certified or that to obtain them as certified would place undue burden on the project. In regards to 4.5, as a project may take several months or years to construct, it is unreasonable to expect a project manager will monitor supplier certificate validity regularly. Rather the responsibility should be to ensure the certificate is valid at the time of purchase of the material. Perhaps this is what is intended by indicating "active suppliers" and if so, this phrasing could be improved for clarity.

4.3: I would suspect many of the FSC stakeholders find this clause disturbing. Non-certified I can understand, but there should be at least some control measures for non-certified material if not controlled wood requirements fully in place.

I would suggest 5%

No

I agree to limit but i am not able to judge the level 2, 3, or 5 % Did you conduct a study on the project that have already been certified to secure this % ?

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

Responses: 15

Non comment

No comments

this is fine as it is.

We would prefer the word "mixed" instead of "contaminated". This is an unfortunate term to use in the context of a construction site. Also you might need to provide a definition for "temporal separation of materials". Many group members will be unfamiliar with FSC terminology and won't know what this means.

5.2 in the event that quarantined material proves to be eligible, can it re-enter the project and likewise, if not, what do you do with it? Could 3.1 Material handling from 40-004 not be used here as it is succinct and generally well understood. Also would ensure consistency. Feedback from the research undertaken by FSC UK in 2015 indicated that further guidance on material handling/accounting would be welcomed.

this is good

b should be done away with. Two options are enough for quality control.

5.2 can be excluded. in case of doubt the material shouldn't be used.

No

Promover identification of material por sobre las demas opciones

5 - There should be greater clarity and confirmation that the eligibility of certified materials can be demonstrated via invoice or other paper work, rather than simply physically identifying the material.

No.

None

No

OK, no comments

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

Responses: 13

No comment

Section 6: the requirements under section 6 are mis-labeled as 7.1 and 7.2 Also Section 7 is missing in the downloadable version of the draft.

6.2 - it's not so much if FSC trademarks are to be used, but if they want the certificate renewed.

No comments

Numbering error in pdf version of the draft. 6.1 Newly purchased needs to be clearly defined. 6.2 the note under 1.1 c) needs to be referenced.

No

6.1 should consider a scenario where forest-based material/products are provided for free (i.e. no purchasing). Proposal for improvement: change newly purchased to newly purchased/provided

in the PDF document in english itens 6.1 and 6.2 are named as 7.1 and 7.2;

Renovation projects are not so different from new buildings. In the definition in Annex 1 Renovation projects are included. Is this clause necessary? A separate clause for maintenance jobs is more important. It would be nice, when it is possible to put all maintenance jobs in a year for 1 client on 1 certificate.

6 - Agreed

No.

No

Perhaps, it needs to establish the list of the "old" materials that are not FSC certified in the documentation of the project

Do you agree with the proposed requirements on how organizations can claim and promote projects as being FSC-certified? If not, do you have any suggestions or comments to provide?

Responses: 18

Yes

Should include possibility of using other wording if it is equivalent.

AGREE

7.3a) reference the standard (FSC-STD-50-001) to avoid any ambiguity. 7.3c) Can they state 100% as certified if the project includes up to 2% non-certified? 7.4 Can they make a percentage claim in relation to the Small and Community Label inputs or can they only make a claim if it is 100% SCLO?

Yes

there should be an award for the best project of the year

Yes

I suggest allow the trademark use since the project beginning in promotional materials like flyers and website (7.2/7.3) because in construction sector the sale is made before the building, and the FSC as a differential is more important in the sale moment. After done it is not a differential any more;

Yes

Yes

no

YES

It's not very clear how this would work: organizations may use the FSC on-product label to identify a full project. Which label? FSC Mix?

I agree.

Yes.

I AGREE ON THE REQUIREMENTS

As per previous answer, the majority of timber arriving on construction sites in the U.K. will have a mix claim (usually FSC Mix 70%), so it is very unlikely a UK project will receive full project certification. Would prefer to see full project certification as being 100% of the timber as FSC certified with a minimum of 70% claim-contributing FSC material.

7.1 Participant should be authorized to claim their participation in an FSC project with explicit reference of their status of NON FSC contractor (if so) to avoid any confusion

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

Responses: 11

No comment

No comment

Ensure alignment here with FSC-STD-50-001 requirements 7.2 Statements should include reference to FSC. Is this list of statements exhaustive? 7.3a) reference the standard (FSC-STD-50-001) to avoid any ambiguity. 7.3 b) reference to "in the signage" here is confusing. 7.3 b) only allow an on-product label for full project certification. 7.3 c) Cost, if partial certification is allowed (see previous comments), should be stated as a percentage of total cost. 7.4 needs further clarification. This section needs further guidance for the receiving organisation/clients/owner of the project in terms of promotion/TM use e.g. via TLA. It is possible for a project to gain full certification (based on the FSC status of the temporary timber) with little/no timber in the actual "product". Would such projects be eligible to make claims on the FSC status of the project?

To avoid confusion it is better that there is congruence between the clause 8.3c and 4.2.

sound good to me

No

If an organization contacts FSC to get a trademark license for promotional purposes about procurement for their building project, are we able to issue a license? Or would they be required to go through project certification? We highly recommend that they still have access to the trademark licensing program as long as they can provide proof that they are procuring FSC-certified materials.

7.3a) now called FSC Trademark Use Guide for Promotional Licence Holders 7.3 c) should be "Partial project certification with percentage claims: organizations may refer to the overall percentage (calculated based on volume or cost) of FSC-certified inputs used in the project."

No

No.

For a percentage claim the change to no minimum percentage is welcome.

According to the draft standard, the certificate for the project is no longer issued by the certification

body. Instead, the certified organization is allowed to issue project statements. Do you agree with this proposal?

Responses: 28

Yes

44%

No

28%

I don't know

16%

[Did not reply]

13%

Do you have any additional comments about this section of the standard? Please indicate the clause or sub-clause you are referring to, otherwise we may not be able to consider your comment in this consultation.

Responses: 18

No specific comment

Section 8: Can a CB revoke/suspend a certificate issued by an organization if it was found to be non-conforming after an audit is completed?

They can issue statements based on the certificate as required by any national or local scheme, but there must be a project certificate as under the current version which includes the listed information a - g in the certificate and its attached schedule. It's not the CB's or FSC's function to provide statements that conform to other schemes. Regarding invoices - unlikely to exist in the construction sector, the ownership of the project should be clear without one.

Not sure we understand the use of the word "may" in this context. Is this optional?

9.1 We do not agree with the organisation effectively self-certifying and we do not understand the rationale for the proposed change. How would a "project certificate statement" be verified by another party? Would this mean that FSC would no longer have data on completed projects and that this data would not be publicly available - this seems like a retrograde step and we do not agree with this. 9.2 We are worried that the individual projects will no longer be identifiable via a unique code issued by FSC (and may not be identifiable at all!)

F) please allow invoice amounts to be removed from invoice

Permitting COs may lead to dilution of certification

8.2 comma in red. 8.2 c) name of the organization is covered by a). Only contact detail is needed in c). 8.2 e) there are cases where a project itself does not have any address (such as a boat). So it should be "e) Project name and address (if applicable);"

I'm not understanding how the society, FSC and CBs will be able to check if a project is FSC certified in the info.fsc if the organization will issue this project statement. I think should exist something like the multi-site list public in the FSC database.

This is not clear at all. After reading the standard only in this question I got this understanding "the certificate for the project is no longer issued by the certification body. Instead, the certified organization is allowed to issue project statements". This is a totally new approach. It shall be explained in the Introduction.

It would be nice if it is possible to put PEFC-components on the certificate too. For our clients it's more clear to have all components on 1 certificate than to have a certificate for the FSC-components and a list of PEFC-components.

What is the intention of the project statement? Compared to the claims? What is the reason behind asking for the invoice no. A statement should be used for communication but not for any control or auditing requirements

Project certificates should only be issued to projects with a minimum of (say) 75% certified material.

I am unsure if it is wise to allow self declarations that are not audited?

Section 8 - it's not clear why this has changed and why the CB wouldn't issue the statement?

8.1: It would be very helpful if this section of the standard would be covered in a way that would imply that there are various ways of applying for project certificates and e.g. this section of the standard illustrates the procedure for cases where the construction company/developer has obtained project certification and manages multiple construction projects. At the moment, this section of the standard implies a significant difference to the previous one and there is not enough description on to which circumstances this is applicable.

No.

f) not useful in the certificate, there is a lot of invoices related to such project in Building For certification bodies, it could be interesting to have a document in the project who list all the invoices related to FSC materials

Do you have any comments about any terms or definitions of the standard? Please indicate the term or definition you are referring to, otherwise we may not be able to consider your comment in this consultation.

Responses: 14

No comment on this definition section

No comments

no.

Add a definition for "temporal separation".

Chain of Custody - different definitions exist in 40-004, 20-011, Glossary of terms. Claim contributing input - different from 40-004 Eligible input - different from 40-004 Please make above consistent in all standards. Finalized project - needs to allow for project scope that doesn't include whole of the project and needs to also reference clause 1.1 allow additional changes under extension. Full project certification - cost is included here, whereas in the standard cost is only applicable under percentage project claims. This definition is not line with the proposal that 2% can be omitted. Non-conforming products - definitions/guidance/requirements need to be included here or at least referencing. Partial project certification - unclear definition Project - definition needs to either be general, and overarching or deal with specific examples. At the moment the definition is neither generic or specific in terms of examples. Project manager - this needs to be defined. Project site - does this definition cover the sites of project members where production may be taking place? If so, needs to be made clearer. Promotional - it is unclear what promotional claims the organisation can make about itself. 8.1 states that the promotion shall refer to a project and the organisation. But, can the organisation promote it's status as a project certified organisation, not in relation to a specific project. Sales document - please align to 40-004

looks standard

Nil

Definition of claim-contributing input - The proposed definition here is different than the one in the COC standard. That doesn't seem appropriate and will cause confusion. If there needs to be clarification that for project certification only percentage claims above 70% are accepted, then we need a new term or just to clarify that (see suggestions for clause 4.2.).

Partial project certification: (i.e. the percentage can vary from 1 to 100%): Is the minimum percentage 1%? 0.5 % possible? Clarification needed.

No

No

No.

No

Before validation of this annex, please give it to neophytes