



Forest Stewardship Council®



COVID-19 Policy Responses

Collection of derogations, interpretations and frequently asked questions

18 June 2020



This document contains the collection of requirements and FAQs related to the pandemic of novel coronavirus COVID-19.

Please note that the requirements are originally published individually, e.g. as an interpretation or derogation. All provisions are compiled in this document to offer a central source of information to FSC stakeholders.

The information is provided by thematic topics:

[PART I POLICY RESPONSES TO CB AUDITING REQUIREMENTS](#)

[PART II POLICY RESPONSES TO CB AUDITOR REQUIREMENTS](#)

[PART III POLICY RESPONSES TO FM CERTIFICATION REQUIREMENTS](#)

[PART IV POLICY RESPONSES TO COC CERTIFICATION REQUIREMENTS](#)

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PART I – POLICY RESPONSES TO CB AUDITING REQUIREMENTS

Generic derogations

Conducting certification audits remotely

Code	FSC-DER-2020-001	
Requirement (s)	As indicated below	
Request by CB	All FSC accredited certification bodies (CBs)	
Rationale as provided by CB	Due to the pandemic of novel coronavirus (COVID-19), vast areas of the world are subject to travel restrictions. INT-STD-20-011_04 foresees a case by case application for derogation by CBs in case of a demonstrated risk to the life or health of auditors, to replace an on-site audit with a desk audit. PSU is requested to give guidance on how CBs shall handle upcoming audits.	
PSU conclusion	Scenarios for applying this derogation	<p>This derogation applies to audits in situations where:</p> <ul style="list-style-type: none"> – CBs assess there is a health risk involved in implementing an on-site audit; <p>or</p> <ul style="list-style-type: none"> – auditors are prevented from conducting an on-site audit due to travel restrictions.
	Preconditions for conducting desk audits	<p>1. CBs shall have a documented policy, procedure, or both, outlining the process to be implemented in case an audit is affected by the novel coronavirus (COVID-19) pandemic. This shall include:</p> <ul style="list-style-type: none"> - A method for assessing whether an on-site audit can be replaced with a desk audit, and - A description of the desk audit methods to be applied in the case of FM and CoC, and - A process to implement the reporting and record keeping requirements of this derogation. <p>2. CBs and certificate holders shall:</p> <ul style="list-style-type: none"> - have the technical and operational capacity to conduct audits remotely, and - agree on a secure and confidential data transmission, and - ensure the availability of key staff. <p>3. CBs shall utilize information and communication technology (ICT) to evaluate all requirements from the annual audit plan to the extent possible.</p> <p>4. Desk audits should be conducted on the basis of:</p> <ul style="list-style-type: none"> - virtual video meetings / virtual company tour, - interviews with relevant people of the certificate holder and stakeholders, - relevant documents and records, - satellite images (where possible), and other best available information.

	Forest Management Pre-evaluations FSC-STD-20-007 V3-0 Definition Pre-evaluation	Pre-evaluation audits may be conducted as desk audits if it is concluded that a desk audit can credibly be conducted.
	Forest Management main audits (initial certification) FSC-STD-20-007 V3-0 Clause 5.4.2	Main audits shall not be replaced by desk audits and should be postponed.
	Chain of Custody main audits (initial certification)	Regulated in FSC-DER-2020-005
	Surveillance audits FSC-STD-20-001 V4-0 Clause 4.7.1 FSC-STD-20-007 V3-0 Clause 6.1.1; INT-STD-20-007_37 FSC-STD-20-011 V4-0 Clauses 2.6 e), 9.2; INT-STD-20-011_04; Clause 9.2 and 9.3	CBs may apply either option below. CBs can apply either option below individually, or both options sequentially if needed. A. Surveillance audits may be postponed for a period not exceeding six (6) months beyond the maximum audit cycle of 15 months (in the case of CoC audits), but not beyond the end of 2020. FM audits can already flexibly be (re-) scheduled within a calendar year. B. Surveillance audits may be conducted as desk audits, when based on an assessment of the scale, intensity and risk of the Organization’s activities it is concluded that a desk audit can credibly be conducted. Examples of the above that would prevent a desk audit include: <ul style="list-style-type: none"> • Certificate holders with open major CARs that require on-site verification, • Certificate holders with purchase/sales mismatches proven through supply chain investigations conducted by the CB, ASI or FSC, • Certificate holders who fail to report purchase/sales when requested through a supply chain investigation, • Certificate holders with unresolved complaints. Where audits cannot be conducted according to these options, the certificate shall be suspended.
	Recertification audits FSC-STD-20-001 V4-0 Clause 1.4.2 and 1.4.3	If a certificate is due to expire in 2020 it may be extended for up to twelve (12) months beyond its original expiry date, if by performing a surveillance audit (which may be conducted remotely in line with this derogation). A recertification audit shall then be performed before the maximum 12-month extension expires in order to renew certification.
	Scope change audits FSC-STD-20-001 V4-0 Clause 4.8.3	Changes in the scope of certification shall be handled in line with FSC requirements and in accordance with operational procedures of CBs. Where on-site audits are required, these audits need to be postponed as necessary before a change of scope may be granted.
	Transfer audits FSC-PRO-20-003 V1-0 Clause 3.2.f)	FM: on-site audits shall not be replaced by desk audits in case of voluntary transfer of certificates to a new CB. CoC: in case of voluntary transfer of certificates to a new CB, on-site audits may be replaced by desk audits for low

		risk scenarios and by a two-stage audit for medium risk scenarios as described in FSC-DER-2020-005.
	On-site internal audits of bodies providing outsourced services FSC-STD-20-001 V4-0 Clause 2.5.5	Where 3-yearly on-site audits of bodies providing outsourced services to CBs are due in 2020, the annual on-site audit may be replaced by a desk audit.
	General	1. CBs shall retain documented evidence for each case where flexibility offered by this derogation has been applied, and document the justification in the audit report (as applicable). 2. CBs shall submit an aggregated quarterly report to FSC on audits conducted according to this derogation. The first report shall be submitted by the end of June 2020 (FSC will provide the report template).
Scope of derogation	<input checked="" type="checkbox"/> Generic (applicable by all certification bodies) <input type="checkbox"/> Specific (applicable only upon individual request and PSU confirmation)	
References	IAF ID 3: 2011: Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations IAF MD 4: 2018: The Use of Information and Communication Technology (ICT) for Auditing/ Assessment Purposes	
Approval date	30 January 2020; last amended 07 May 2020	
Period of validity	Until 31 of December 2020, or until withdrawn. This derogation will be updated as necessary.	

Conducting COC main evaluation audits remotely

Code	FSC-DER-2020-005
Requirements	FSC-STD-20-011 Part 1, FSC-STD-40-003 V2-1
Rationale	<p>Due to the pandemic of novel coronavirus (COVID-19), vast areas of the world are subject to travel restrictions and many certification bodies have not been able to undertake physical onsite audits for main evaluations.</p> <p>There have been multiple requests from certification bodies for the possibility to undertake the main (initial) evaluation audits of new applicants remotely. Simultaneously, there have also been requests from group/multi-site certificate managers to permit remote internal audits for new applicants. This is expected to be a short-term measure till the COVID-19 situation improves and the related health risks and travel restrictions/social distancing restrictions are no longer applicable.</p>
PSU conclusion	<p>Scenarios for applying this derogation:</p> <ol style="list-style-type: none"> 1. Main evaluations by CBs in situations where: <ol style="list-style-type: none"> a. CBs assess there is a health risk involved in implementing an on-site audit; <i>or</i> b. auditors are prevented from conducting an on-site audit due to travel restrictions. 2. Central Office internal audits for new applicant sites for group/multi-site certificates where: <ol style="list-style-type: none"> a. the Participating Site is in an area with a health risk (demonstrated through verifiable public sources, e.g. official travel warnings or restrictions) due to coronavirus, <i>or</i> b. Central Office auditors are prevented from conducting an on-site audit due to travel restrictions imposed by organizational (certificate holder/Central Office) health and safety policies or public authorities.
	<p>Preconditions for conducting desk audits for main evaluations:</p> <ol style="list-style-type: none"> 1. CBs shall have a documented policy, procedure, or both, outlining the process to be implemented in case an audit is affected by the novel coronavirus (COVID-19) pandemic. This shall include: <ul style="list-style-type: none"> - A method for assessing whether an on-site audit can be replaced with a desk audit, <i>and</i> - A description of the desk audit methods to be applied, <i>and</i> - A process to implement the reporting and record keeping requirements of this derogation. 2. CBs and certificate holders shall: <ul style="list-style-type: none"> - have the technical and operational capacity to conduct audits remotely, <i>and</i> - agree on a secure and confidential data transmission <i>and</i> - ensure the availability of key staff. <p>NOTE: This requirement shall include all sites/group members covered in the application, and any contractors who are physically handling the material.</p> 3. CBs shall utilize information and communication technology (ICT) to evaluate the applicant. 4. Desk audits should be conducted on the basis of: <ul style="list-style-type: none"> - virtual video meetings / virtual company tour, - interviews with relevant people of the certificate holder and stakeholders,

	<ul style="list-style-type: none"> - relevant documents and records, - other best available information.
	<p>Certification bodies may conduct desk audits for main evaluations of Chain of Custody and Project certification applicants according to the following requirements:</p> <ol style="list-style-type: none"> 1. Prior to conducting a main evaluation, the information obtained by the CB from the applicant shall be sufficient to conduct the risk assessment according to the requirements in this derogation (see FSC-STD-20-001 V4-0 Clause 4.1.3). 2. The certification body can demonstrate that the full scope of the audit can be covered remotely, and it is possible to evaluate with adequate assurance the conformity of the applicant to the normative requirements. 3. CBs shall conduct a risk assessment of each applicant according to the scenarios/ factors provided in Annex A to determine the option of conducting a fully remote audit (low risk), a partially remote audit (medium risk), or if a mandatory on-site audit is required (high risk). The risk assessment is to be undertaken at the level of a single site and not at the certificate level. For multi-site certificates, the risk assessment shall be undertaken for each participating site (or for each site selected by sampling) during the evaluation audit. 4. When an applicant falls into more than one risk category, the CB shall adopt the precautionary approach and apply the audit type of the higher category. 5. Applicants with medium risk shall be audited in a two-stage audit process: A Stage 1 initial desk audit which can lead to certificate issuance, followed by a Stage 2 on-site audit, to be undertaken when the related health risks have abated and/or travel restrictions are no longer applicable or at the first surveillance evaluation (see Clause 7 below), whichever is earlier. A certificate can be issued on successful completion of Stage 1. Stage 2 audit shall cover the factors which lead to the medium risk categorization and include requirements whose compliance cannot be verified though a remote audit or which require an on-site follow-up to verify compliance once processing of FSC material starts. 6. In case the Stage 2 audit cannot be undertaken until the time of the first surveillance evaluation (due to health risks and/or travel restrictions), the stage 2 audit shall be replaced by the full surveillance evaluation, which shall be conducted as an on-site audit. 7. The first surveillance evaluation after certification shall be conducted within twelve (12) months after the date of the desk audit. Failure shall lead to the suspension of the certificate. 8. Any scenario not covered in Annex A shall be considered as 'high-risk'. In such cases, CBs may approach PSU to provide further instructions. <p>NOTE: This derogation may be modified/ updated based on additional information regarding risk levels categories.</p>

	<p>9. CBs shall retain documented evidence for each case where this derogation has been applied and document the justification in the audit report.</p> <p>10. CBs shall submit an aggregated quarterly report to FSC on audits conducted according to this derogation. The first report shall be submitted by the end of June 2020 (FSC will provide the report template).</p> <p>Central offices of Group/Multi-site certificates may replace the initial internal audits for new applicant sites/members by desk audits according to the following requirements:</p> <p>11. The new applicant site meets the requirements of clause 5.3.5 of FSC-STD-40-003 V2-1 <i>or</i></p> <p>12. The Central Office shall conduct a risk assessment of each applicant according to the scenarios/ factors provided in Annex A to determine the option of conducting a fully remote audit (low risk), a partially remote audit (medium risk), or if a mandatory on-site audit is required (high risk).The risk assessment is to be undertaken at the level of each new applicant site.</p> <p>13. When an applicant falls into more than one risk category, the Central Office shall adopt the precautionary approach and apply the audit type of the higher category.</p> <p>14. The risk assessment by the Central Office shall be approved by their certification body prior to conducting remote audits.</p> <p>15. Applicants with medium risk shall be audited in a two-stage audit process: A Stage 1 initial desk audit which can lead to inclusion in the FSC group/multi-site certificate, followed by a Stage 2 on-site audit, to be undertaken when the related health risks have abated and/or travel restrictions are no longer applicable or at the first annual audit (see Clause 16, below), whichever is earlier. Stage 2 audit shall cover the factors which lead to the medium risk categorization and include requirements whose compliance cannot be verified through a remote audit or which require an on-site follow-up to verify compliance once processing of FSC material starts.</p> <p>16. In case the Stage 2 audit cannot be undertaken until the time of the first annual audit (due to health risks and/or travel restrictions), the stage 2 audit shall be replaced by the full annual audit, which shall be conducted as an on-site audit.</p> <p>17. Central office and applicant sites shall:</p> <ul style="list-style-type: none"> - have the technical and operational capacity to conduct audits remotely, <i>and</i> - agree on a secure and confidential data transmission <i>and</i> - ensure the availability of key staff. <p>18. The Central Office shall retain documented evidence for each applicant where this derogation has been applied.</p> <p>19. CBs shall submit an aggregated quarterly report to FSC on instances where their certificate holders have undertaken remote evaluation</p>
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	audits for new applicants according to this derogation. The first report shall be submitted by the end of June 2020 (FSC will provide the report template).
Scope of derogation	<input checked="" type="checkbox"/> Generic (applicable by all certification bodies and certificate holders) <input type="checkbox"/> Specific (applicable only upon individual request and PSU confirmation)
Approval date	08 May 2020. Amended on 14 June 2020
Effective date	15 June 2020
Period of validity	Until 31 December 2020. This derogation will be regularly reviewed prior to the end of the validity date and updated and possibly extended as necessary.

Annex A: Risk determination for undertaking remote main evaluation audits

Scenario	Low risk	Medium risk	High risk
Traders	<ul style="list-style-type: none"> without physical possession with physical possession, but restricted to storage/trading in finished and labelled products 	<ul style="list-style-type: none"> With physical possession and trading in unfinished/non-labelled products 	
Primary and secondary producers/processors/printers and related services	<ul style="list-style-type: none"> Exclusively handling certified products made of single input material (e.g., whole site deals with FSC 100%) All inputs to production are eligible inputs according to Table B in FSC-STD-40-004, only transfer system is used and physical segregation is not required 	<ul style="list-style-type: none"> Use of either percentage or credit system with/without multiple product groups 	<ul style="list-style-type: none"> High complexity with management and uses of all control systems.
Non-eligible input entering the supply chain	<ul style="list-style-type: none"> Risk mitigated by temporal separation of material 	<ul style="list-style-type: none"> Risk mitigated by identification of material Risk mitigated by physical separation of materials if mitigation can be verified by real time video 	<ul style="list-style-type: none"> Risk mitigated by physical separation of materials
Contractors/outsourcing activities	<ul style="list-style-type: none"> Low risk contractors or High-risk contractors with low risk categorization as per Clause 	<ul style="list-style-type: none"> Low risk contractors but with identified risk of improper additions or mixing by the contractors at 	<ul style="list-style-type: none"> High risk contractors as defined in Clause 9.2 of FSC-STD-20-011

	9.3 of FSC-STD-20-011	the contracting facility	
Sourcing reclaimed materials	<ul style="list-style-type: none"> • Supplier audit program undertaken by another FSC accredited CB 	<ul style="list-style-type: none"> • Reclaimed material classification can be demonstrated through objective evidence upon receipt. 	<ul style="list-style-type: none"> • Supplier audit program undertaken by applicant organization <i>and</i> reclaimed material classification through objective evidence not possible.
Sourcing CW through implementation DDS as per requirements of FSC-STD-40-005 standard	<ul style="list-style-type: none"> • Low risk of origin, <i>and</i> • Low risk of mixing 	<ul style="list-style-type: none"> • Specified risk for origin (mitigation measures do not require field level verification) <i>and</i> • Low risk of mixing 	<ul style="list-style-type: none"> • Specified risk for origin (mitigation measures require field level verification) <i>or</i> • Specified risk of mixing that can be mitigated only by physical separation.
Group and multi-site certification (Central office requirements may be evaluated in the same manner as a single site)	<ul style="list-style-type: none"> • Normal risk** participating site 	<ul style="list-style-type: none"> • High risk participating site* which meets remote audit requirements for reclaimed materials sourcing, CW sourcing and for contractors 	<ul style="list-style-type: none"> • High risk participating site*.
Other risk factors		<ul style="list-style-type: none"> • Custom manufactured products with individual conversion factors • Project certification 	<ul style="list-style-type: none"> • Unresolved complaints/disputes regarding the organization's conformity to the requirements of FSC standards

***High-risk participating site:** A participating site operating a controlled wood verification program or due diligence system according to FSC-STD-40-005, a supplier audit program for reclaimed materials according to FSC-STD-40-007, or high-risk outsourcing to a non-FSC-certified contractor.

****Normal risk participating site:** A participating site that does not conduct any of the activities considered 'high risk' above.

Interpretations

Extending transfer audit date

Code	INT-PRO-20-003_09
Requirement (s)	FSC-PRO-20-003 V1-0, Clause 3.2.f) FSC-DER-2020-001
Publication date	26 May 2020 Effective from the date of publication until 31 December 2020, or until withdrawn. This interpretation will be updated as necessary.
As a transfer audit is supposed to be conducted according to the requirements for a surveillance evaluation, can this transfer audit for CoC also be postponed in accordance with FSC-DER-2020-001?	
Yes, the transfer audit for CoC can be postponed, but shall be conducted within (6) six months of the agreed transfer date. In case of medium risk, this timeline refers to the Stage 1 audit.	

Frequently Asked Questions

FAQ I-1	FSC-DER-2020-001: Recertification
Question	Is it required to complete the surveillance audit before the certificate expires?
Answer	The surveillance audit required to extend the certificate should be completed before the certificate expires, but under the COVID-19 scenario the certificate may be extended for up to 6 months according to FSC-STD-20-001 V4-0 Clause 1.4.4 in order to permit the surveillance audit to be completed. Upon successful completion of the surveillance audit, the certificate may then be extended for 12 months beyond its original expiry date. Please note that both timelines refer to the original expiry date and cannot be added up (thus, no extension for 6 months + 12 months).

FAQ I-2	FSC-DER-2020-001: Recertification
Question	Do CBs need to issue physical certificates for extended validity periods or is it sufficient to extend the validity in the FSC Database?
Answer	Issuing physical certificates is voluntary as of V4-0 of FSC-STD-20 001. It is therefore not required to re-issue a certificate with a new expiry date, unless the CB decides it's necessary to do so. It is however required that the database entry is updated accordingly.

FAQ I-3	FSC-DER-2020-001: Recertification
Question	When a certificate has been extended based on a surveillance audit as per FSC-DER-2020-001, shall the CB then conduct both the recertification audit and the first surveillance in 2021?
Answer	No, in 2021 the CB shall conduct the recertification audit, based on which a new 5-year certificate may be issued. The first surveillance would then be due in 2022.

FAQ I-4	FSC-DER-2020-005: COC main evaluation
Question	Can a printer who is buying FSC and PEFC paper, and therefore has to segregate their paper stocks, be audited remotely?
Answer	A printer who is buying and using both FSC and PEFC paper does not qualify for 'low risk' designation, since they need to segregate their paper stocks. However, they could be audited remotely with a 2 stage audit process as provided for scenarios with medium risk.

PART II – POLICY RESPONSES TO CB AUDITOR REQUIREMENTS

Generic derogation

Code	FSC-DER-2020-004	
Requirement (s)	As indicated below	
Request by	FSC accredited CBs and (independent) training providers	
Rationale as provided by CBs / and (independent) training providers	Due to the pandemic of novel coronavirus (COVID-19), vast areas of the world are subject to travel restrictions. This results in difficulties for CBs and (independent) training providers to ensure conformity with FSC requirements with regards to auditor qualification and other requirements specifically related to auditors.	
PSU conclusion	Scenarios for applying this derogation	This derogation applies in situations where: – CBs assess there is a health risk involved in allowing auditors to travel to conform with FSC training and (continuous) qualification requirements; or –auditor candidates, qualified auditors, supervising auditors, training providers, trainers and trainees are prevented from conducting and participating in trainings and audits due to travel restrictions.
	Qualification of auditor candidates FSC-STD-20-001 V4-0 Annex 2, Table 2, 1.1, #5 Annex 2, Table 3, 2.1, #5	It is not possible to qualify FM auditor candidates by replacing on-site audits by desk audits. CoC auditor candidates that participated in at least two on-site audits may conduct CoC desk audits, if they otherwise successfully completed their training program in accordance with FSC requirements. Prior to conducting any on-site audits on their own, such auditors are required to complete the remaining on-site audits.
	Continuous qualification FSC-STD-20-001 V4-0 Annex 2, Table 2, 1.2, #2 Annex 2, Table 3, 2.2, #2	The number of days conducted as desk-based audits during 2020 may count as auditing days for retaining auditor status and shall be recorded accordingly.
	Continuous qualification FSC-STD-20-001 V4-0 Annex 2, Table 2, 1.2, #3 Annex 2, Table 3, 2.2, #3	All 3-yearly witness audits that are due in 2020 may be postponed for up to twelve (12) months.
	Training courses FSC-PRO-20-004 V2-1 Clause 3.3.5	Training Providers may replace classroom (in-person) training by remote trainings until 31 December 2020, based on the following specifications: - travel restrictions are in place for any of the registered trainees or the trainer(s). - the training provider shall document all cases of travel restrictions;

		<p>- trainings should offer similar opportunities as in-person trainings to conduct practical exercises and allow for interaction of trainer(s) and trainees (as far as technology allows),</p> <p>- decisions about replacing in-person trainings by remote trainings may be based on travel restrictions that are in place up to two months before the scheduled in-person course.</p> <p>This derogation may be retroactively applied to training courses that were cancelled due to coronavirus prior to the publication of the derogation.</p> <p>Note: Clause 1.2 specifying that 'two hours of in-person training are seen as equivalent to one hour of online training' may also be applied to this derogation.</p>
	<p>Auditor rotation FSC-STD-20-001 V4-0 Clause 4.3.7 Clause 4.3.8</p>	<p>For audits due in 2020 and where auditor rotation is required, the rotation period may be extended by one (1) audit.</p>
Scope of derogation	<p><input checked="" type="checkbox"/> Generic (applicable by all certification bodies and (independent) training providers)</p> <p><input type="checkbox"/> Specific (applicable only upon individual request and PSU confirmation)</p>	
References	<p>IAF ID 3: 2011: Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations</p> <p>IAF MD 4: 2018: The Use of Information and Communication Technology (ICT) for Auditing/ Assessment Purposes</p>	
Approval date	<p>23 April 2020</p>	
Period of validity	<p>Until 31 of December 2020, or until withdrawn. This derogation will be updated as necessary.</p>	

PART III – POLICY RESPONSES TO FM CERTIFICATION REQUIREMENTS

Interpretations

Monitoring visits of Group Members

Code	INT-STD-30-005_13
Requirement (s)	Section 8 Monitoring requirements
Publication date	03. April 2020 Effective from the date of publication until 31 of December 2020, or until withdrawn. This interpretation will be updated as necessary.
<p>Clause 8.1 requires that regular (at least annual) monitoring visits to a sample of Group Members to confirm continued compliance with all the requirements of the applicable Forest Stewardship Standard, and with any additional requirements for membership of the Group.</p> <p>Due to the coronavirus (COVID-19) pandemic, that places travel restrictions on many areas of the world, can these monitoring visits be replaced by remote desk audits?</p> <p>1. Yes, the coronavirus (COVID-19) pandemic does justify conducting desk audits (remote audits) in situations where:</p> <ul style="list-style-type: none"> a. the Group Member is in an area with security risk (demonstrated through verifiable public sources, e.g. official travel warnings or restrictions) due to coronavirus, or b. the Group Entity is prevented from conducting an on-site monitoring visits due to travel restrictions imposed by organizational (certificate holder/Group entity) health and safety policies or public authorities. <p>2. Where the initial onsite audit of a new Group applicant is required, that audit shall not be replaced by desk audits (remote audits) and should be rescheduled.</p> <p>3. In addition to the option of conducting the monitoring visits as desk audits (remote audits), the Group Entity may also consider postponing the monitoring visits, but not beyond the end of 2020.</p> <p>4. The Group Entity shall retain documented evidence for each case where this interpretation has been applied.</p> <p>NOTE: As soon as travel restrictions have been lifted, monitoring visits shall be conducted as per regular procedures.</p>	

PART IV – POLICY RESPONSES TO COC CERTIFICATION REQUIREMENTS

Generic derogations

Use of Virgin Fibre in FSC Recycled Products

Code	FSC-DER-2020-003
Requirements	FSC-STD-40-004 V3-0 Clauses 2.4, 4.2, 5.1, 10.8, 10.9, 11.1
Rationale	<p>There is an increased demand for tissue and hygiene products on account of the COVID-19 pandemic situation. A significant amount of these products contains recycled paper using the FSC Mix and FSC Recycled labels. We are now beginning to see a shortage of recycled fibre to use in these products due to supply constraints and travel restrictions in many areas of the world arising out of the COVID-19 situation.</p> <p>Due to the logistical and practical difficulties that do not permit changing of packaging material at short notice, there are requests from organizations to allow substitution of recycled fibre with virgin fibre in products carrying the FSC Recycled label. This is expected to be a short-term measure till the COVID-19 situation improves and relevant supply chains and volumes can be re-established.</p>
PSU conclusion	<p>Organizations may use virgin fibre for tissue and hygiene products carrying the FSC Recycled label under the following conditions:</p> <p>NOTE: Organizations that are producing FSC Recycled products but are not using the FSC Recycled label on the product should move these products to a new 'FSC Mix' product group with recycled and virgin material inputs and sell them with the corresponding claim on the invoice.</p> <ol style="list-style-type: none"> 1. The organization demonstrates that there is a scarcity of recycled fibre due to the COVID-19 pandemic. 2. The organization demonstrates that it is logistically not viable to change the FSC Recycled label to FSC Mix on the product packaging for the period of the derogation. <p>NOTE: Organizations which are able to update their packaging labels in time should establish a new FSC Mix product group and provide the product with 'FSC Mix' claims accordingly.</p> <ol style="list-style-type: none"> 3. The virgin fibre used in place of recycled fibre is either FSC 100%, FSC Mix, controlled material or FSC Controlled Wood. <p>NOTE: Use of virgin fibre as controlled material requires the organization to be certified against FSC-STD-40-005.</p> <ol style="list-style-type: none"> 4. The proportion of virgin fibre in any given product labelled as FSC Recycled is below 50%. 5. The organization <ol style="list-style-type: none"> a. has FSC Recycled credits covering the corresponding volume of virgin fibre: <p>NOTE: Unused FSC Recycled credits from other product groups can be transferred if the relevant material generating these credits can be considered equivalent according to the Note under Clause 7.2 of FSC-STD-40-004.</p>

	<p>i. the corresponding volume of virgin fibre is deducted from the Recycled credits;</p> <p>NOTE: The claim on sales documents continues to be FSC Recycled Credit and the products can have the corresponding labels.</p> <p>or</p> <p>b. has not enough FSC Recycled credits covering the corresponding volume of virgin fibre:</p> <p>i. the corresponding volume of virgin fibre is put into the FSC Recycled credit account as a negative balance;</p> <p>ii. the negative credit balance is evened out within 12 months from the end of the validity period of this derogation, based on an agreed recovery plan with the certification body.</p> <p>NOTE: The claim on sales documents continues to be FSC Recycled Credit and the products can have the corresponding labels.</p> <p>6. The organization maintains up to date records regarding volumes, material sourcing and accounting of both virgin and recycled fibre and agrees to share it with FSC/ASI upon request for any project aimed at tracking/managing such issues.</p>
Scope of derogation	<input checked="" type="checkbox"/> Generic (applicable by all certification bodies) <input type="checkbox"/> Specific (applicable only upon individual request and PSU confirmation)
Approval date	16 April 2020
Period of validity	Until 30 June 2020. This derogation will be regularly reviewed prior to the end of the validity date and updated and possibly extended as necessary.

Reducing the labelling threshold for FSC Mix Percentage products in the timber, furniture and construction industry

Code	FSC-DER-2020-006
Requirements	FSC-STD-40-004 V3-0 Clause 11.1
Requested by	FSC accredited certification bodies (CBs)
Rationale	<p>The timber, furniture, and construction industry are currently facing disruptions in supply lines due to both supply constraints and travel restrictions in many areas of the world due to the COVID-19 pandemic situation.</p> <p>Many of the products sold by the industry carry the FSC Mix Percentage claim and FSC Mix label, which requires a minimum of 70% of FSC material in the product by weight/volume. However, supply restrictions are making it challenging for organizations to meet this 70% threshold in this situation.</p> <p>Due to the logistical, contractual and practical difficulties that do not permit changing of packaging material and labels at short notice, there are requests from organizations to allow a temporary relaxation in the labelling threshold for FSC Mix percentage claims for products carrying the FSC Mix label. This is expected to be a short-term measure until the COVID-19 situation improves, and relevant supply chains and volumes can be re-established.</p>

<p>PSU conclusion</p>	<p>Organizations in the timber, furniture, and construction industry that use the FSC Mix label on their products may reduce the percentage of FSC material in products with the FSC Mix percentage down to 51% under the following conditions:</p> <ol style="list-style-type: none"> 7. The organization demonstrates that it has been achieving a consistent share of FSC percentage (minimum 70%) in their products over a significant period (at least 1 certification cycle) and regularly sold products with the FSC Mix label. 8. The organization demonstrates that there is a scarcity of eligible input in their supply chains due to the COVID-19 pandemic. 9. The organization demonstrates that it is logistically, practically or contractually not viable or potentially business critical to: <ol style="list-style-type: none"> a. remove the FSC Mix label from the product packaging for the period of the derogation. <i>or</i> b. switch to a credit system and use the FSC Mix label only for the corresponding part of their products. 10. The organization demonstrates that it has secure FSC supply lines in place (long-term purchase agreements etc.) which can be verified by the CB. 11. The organization ensures that the proportion of FSC material in the product group does not fall below the 51% threshold in labelled products during the validity period of this derogation. 12. The organization shall: <ol style="list-style-type: none"> a. Have a clear and documented plan for recovery of the volumes of FSC material that was not used in FSC labelled products on account of going below the 70% threshold ('negative balance'). b. Pay back the "overdraft" or "negative balance" in the mix % as calculated in 6 a) no later than December 31, 2021. c. Report to the CB monthly with the average 12-month rolling average and provides up to date records regarding volumes, material sourcing, and 'negative balance' recovery. 13. CBs shall inform the FSC Chain of Custody program when they have information on their certificate holders making use of this derogation. This information shall include, at a minimum the following aspects and would need to be updated at the end of the derogation period: <ol style="list-style-type: none"> a. Product groups for which this derogation is to be applied; b. Duration for which the derogation is going to be applied; c. The total volume of 'negative balance' created over the period; d. The plan to recover the 'negative balance' and when the recovery is expected to be completed.
<p>Scope of derogation</p>	<p><input checked="" type="checkbox"/> Generic (applicable by all certification bodies) <input type="checkbox"/> Specific (applicable only upon individual request and PSU confirmation)</p>
<p>Approval date</p>	<p>30 April 2020</p>
<p>Period of validity</p>	<p>Effective upon publication until 31 October 2020. This derogation will be regularly reviewed prior to the end of the validity date and updated and possibly extended as necessary.</p>

Interpretations

Internal audits of Participating Sites

Code	INT-STD-40-003_05
Requirement (s)	FSC-STD-40-003 V2-1 Clause 5.3.5
Publication date	20 March 2020, updated 07 May 2020, updated 15 June 2020 Effective from the date of publication until 31 December 2020, or until withdrawn. This interpretation will be updated as necessary.
<p>Clause 5.3.5 offers the option that Central Offices may conduct internal audits of Participating Sites as desk audits (remote audits) under certain circumstances. Would the coronavirus (COVID-19) pandemic, that places travel restrictions on many areas of the world, also be considered a circumstance in which desk audits (remote audits) would be justifiable?</p> <p>Yes, the coronavirus (COVID-19) pandemic does justify applying the option of desk audits (remote audits) as per Clause 5.3.5 for all types of participating sites, provided that:</p> <ol style="list-style-type: none"> a. the Participating Site is in an area with a health risk (demonstrated through verifiable public sources, e.g. official travel warnings or restrictions) due to coronavirus, or b. Central Office auditors are prevented from conducting an on-site audit due to travel restrictions imposed by organizational (certificate holder/Central Office) health and safety policies or public authorities. <ol style="list-style-type: none"> 2. In addition to the option of conducting the internal audit as desk audits (remote audits), the Central Office may also consider postponing the internal audit, but not beyond the end of 2020. 3. For new applicant sites, the initial internal audit may be replaced by desk (remote) audits in cases: <ol style="list-style-type: none"> a. the new applicant sites are already meeting the existing requirements of Clause 5.3.5, <i>or</i> b. the Central Office and the applicant sites meet the requirements specified in FSC-DER-2020-005 then the initial internal audit may be replaced by desk (remote) audits. 4. The Central Office shall retain documented evidence for each case where this interpretation has been applied. 5. As soon as travel restrictions have been lifted, internal audits shall be conducted as per regular audit procedures. 	