

FSC コンサルテーションプラットフォームにおける回答方法

[こちらのリンク](https://consultation-platform.fsc.org/en/consultations/take/c9b5db01083e52) (https://consultation-platform.fsc.org/en/consultations/take/c9b5db01083e52) より、コンサルテーションプラットフォームにアクセスし、ログインすると、最初に下の画面が表示されます。 ※FSC コンサルテーションプラットフォームのアカウントがない方は、[こちらのニュース](#)に掲載しております「FSC コンサルテーションプラットフォームのアカウント作成方法」を参考に作成してください。

The screenshot shows the FSC Consultation Platform interface. At the top left is the FSC logo with the text "FORESTS FOR ALL FOREVER". To the right, it says "FSC CONSULTATION PLATFORM". Below this are navigation tabs: "CONSULTATIONS", "ABOUT", "MY PROFILE", and "LOG OUT". The main content area features a red-bordered box with the title "[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS". Below the title, there is a welcome message and a red annotation: "ここに今回のコンサルテーションのタイトルが表示されます". A section titled "Supporting documents" with a sub-header "関連文書 (英語のみ)" lists 13 PDF documents. At the bottom, there is a red-bordered button labeled "PARTICIPATE NOW" and a red annotation: "←ここをクリックして回答を開始します。".

なお、本プラットフォームでは締切日までは何度でもコメントを修正することができます。一度コメントを提出した後は、提出済み进行を意味する **SUBMITTED** の文字が現れ、右下のボタンが PARTICIPATE (参加する) から EDIT ANSWERS (回答を編集する) に変わります。

The screenshot shows the FSC Consultation Platform interface after submission. The title "[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS" is displayed. Below the title, there is a welcome message and a red-bordered button labeled "SUBMITTED". At the bottom, there is a red-bordered button labeled "EDIT ANSWERS" with a right-pointing arrow. The closing date is shown as "Closing date: 15th October 2024 23:59:59 CET".

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

Section content

YOUR FEEDBACK

Do you give your consent for being contacted by FSC via email?

- Yes **FSC からメールで連絡を受け取ることに同意しますか？**
 No

Do you give your consent to share your contact details with other FSC stakeholders to connect you for working together on this subject matter?

- No **FSC の他の利害関係者と連絡先を共有し、この件に関して協力することに同意しますか？**
 Yes

If you responded yes to any of the above, please provide your email address:

上記のいずれかに「はい」とお答えになった方は、メールアドレスをご記入ください：

Supporting documents:

[FSC-STD-40-004 V3-1 EN Chain of Custody Certification.pdf](#)

[FSC-STD-40-004 V3-1 ES Chain of Custody Certification.pdf](#)

[FSC-STD-40-003 V2-1 ES Certificación de Cadena de Custodia de sitios múltiples.pdf](#)

[FSC-STD-40-003-V2-1-EN-COC-certification-of-multiple-sites.pdf](#)

[FSC-STD-40-007 V2-0 EN Sourcing reclaimed material for use in FSC Product Groups or FSC Certified Projects.pdf](#)

[FSC-STD-40-007 V2-0 ES Estndar FSC para el Suministro de Material Recuperado para Su Uso en Grupos de Producto FSC o Proyectos Certificados FSC.pdf](#)

[FSC-PRO-40-003 V1-1 EN Development of National Group Chain of Custody Eligibility Criteria.pdf](#)

[FSC-PRO-40-003 V1-1 ES Desarrollo de Criterios de Elegibilidad Nacionales para Cadena de Custodia en Grupo.pdf](#)

[CoC Workshop-synopsis-report_Final_1482024.pdf](#)

[PSU Circularity report.pdf](#)

[CoC Conceptual-phase-Report_EN.pdf](#)

[CoC Conceptual-phase-Report_ES.pdf](#)

ここをクリックして次に進みます。↓

こちらのプルダウンメニューから直接関心のあるセクションに移動することもできます。

NEXT SECTION

Participant information

Save current progress

Save current progress and exit

現在までに入力したコメントを保存して、一度中断する
(コンサルテーション期間内であれば、後から何度でも戻れます)

コンサルテーションの各ページの構造

①左側に規格文書の一部が掲載されています。②スライドバーを使って、下まで確認することができます。③規格文書の日本語訳は、以下のページより「構想段階報告書（日本語版）」をダウンロードしてご確認いただけます。右側の④YOUR FEEDBACK の欄で、提案内容に関する賛成度、およびコメントを記入します。

<https://jp.fsc.org/jp-ja/newsfeed/webinar-for-COC-consultation>

CONSULTATIONS
ABOUT
MY PROFILE
LOG OUT

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

①

1. Structure of the Normative Document
1.1. Combining Standards

The revision process aims to merge the three standards applicable to certificate holders (CHs) which are under revision, following the structure presented in Table 2 below.

This approach, alongside introducing modularity (see Section 1.2 of the document), is expected to not only provide a one-off transition date, but also presents added benefit of streamlining the normative framework by reducing the number of standards and the repetition of requirements, e.g., Part IV in FSC-STD-40-004 V3-1 is equivalent to Part I in FSC-STD-40-003 V2-1. Following this approach, certain procedures will be phased out (e.g., FSC-PRO-40-003).

Table 2. Integration of standards under revision into a single standard.

Current normative code and title		Foreseen normative code and title	
FSC-STD-40-004 V3-1	Chain of Custody Certification	FSC-STD-40-004 V4-0	Chain of Custody Certification
FSC-STD-40-003 V2-1	Chain of Custody Certification of Multiple Sites		
FSC-PRO-40-003 V1-1	Development of National Group Chain of Custody Eligibility Criteria		
FSC-PRO-40-003a	List of Approved Group Chain of Custody Eligibility Criteria		

Supporting documents:
[FSC-STD-40-004 V3-1 EN Chain of Custody Certification.pdf](#)
[FSC-STD-40-004 V3-1 ES Chain of Custody Certification.pdf](#)
[FSC-STD-40-003 V2-1 ES Certificación de Cadena de Custodia de sitios múltiples.pdf](#)
[FSC-STD-40-003 V2-1 EN COC-certification-of-multiple-sites.pdf](#)
[FSC-STD-40-007 V2-0 EN Sourcing reclaimed material for use in FSC Product Groups or FSC](#)
[FSC-STD-40-007 V2-0 ES Estndar FSC para el Suministro de Material Recuperado para Su U](#)
[FSC-PRO-40-003 V1-1 EN Development of National Group Chain of Custody Eligibility Criteria](#)
[FSC-PRO-40-003 V1-1 ES Desarrollo de Criterios de Elegibilidad Nacionales para Cadena de](#)
[COC Workshop-synopsis-report_Final_1482024.pdf](#)
[PSU Circularity report.pdf](#)
[CoC Conceptual-phase-Report_EN.pdf](#)
[CoC Conceptual-phase-Report_ES.pdf](#)

YOUR FEEDBACK ④

1. To what extent do you agree with the proposal for combining standards.

1. STRUCTURE OF THE NORMATIVE DOCUMENT ③

規準文書の構造

1.1. Combining Standards

規格の統合

The revision process aims to merge the three standards applicable to certificate holders (CHs) which are under revision, following the structure presented in Table 2 below.

この改定プロセスは、以下の表2に示す構成に従って、認証取得者（CH）に適用される改定中の3つの規格を統合することを目的としている。

This approach, alongside introducing modularity (see Section 1.2 of this document below), is expected to not only provide a one-off transition date, but also presents added benefit of streamlining the normative framework by reducing the number of standards and the repetition of requirements, e.g., Part IV in FSC-STD-40-004 V3-1 is equivalent to Part I in FSC-STD-40-003 V2-1. Following this approach, certain procedures will be phased out (e.g., FSC-PRO-40-003).

この方法は、モジュール化（本文書の 下記1.2 項を参照）の導入と並んで、移行を一回で済ませるだけでなく、規格の数や要求事項の重複を減らすことによって、規準文書の枠組みを合理化するという追加

Please provide the rationale for your answer and/or any suggestions for

Table 2. Integration of standards under revision into a single standard.

表2: 改定中の規格の単一規格への統合

Current normative code and title		Foreseen normative code and title	
現在の規準文書コードとタイトル		想定される規範コードとタイトル	
FSC-STD-40-004 V3-1	Chain of Custody Certification CoC認証		
FSC-STD-40-003 V2-1	Chain of Custody Certification of Multiple Sites 複数サイトのCoC認証		
FSC-PRO-40-003 V1-1	Development of National Group Chain of Custody Eligibility Criteria 国内グループCoC資格基準の策定	FSC-STD-40-004 V4-0	Chain of Custody Certification CoC認証
FSC-PRO-40-003a	List of Approved Group Chain of Custody Eligibility Criteria 承認済みグループCoC資格基準の一覧		

PREVIOUS SECTION

前のセクションへ戻る
次のセクションへ進む

NEXT SECTION

1. Structure of the Normative Document

6% 回答の進捗度

Save current progress
Save current progress and exit

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

1. 規準文書の構造

1. Structure of the Normative Document
1.1. Combining Standards

The revision process aims to merge the three standards applicable to certificate holders (CHs) which are under revision, following the structure presented in Table 2 below.

This approach, alongside introducing modularity (see Section 1.2 of the document), is expected to not only provide a one-off transition date, but also presents added benefit of streamlining the normative framework by reducing the number of standards and the repetition of requirements, e.g., Part IV in FSC-STD-40-004 V3-1 is equivalent to Part I in FSC-STD-40-003 V2-1. Following this approach, certain procedures will be phased out (e.g., FSC-PRO-40-003).

Table 2. Integration of standards under revision into a single standard.

Current normative code and title		Foreseen normative code and title	
FSC-STD-40-004 V3-1	Chain of Custody Certification	FSC-STD-40-004 V4-0	Chain of Custody Certification
FSC-STD-40-003 V2-1	Chain of Custody Certification of Multiple Sites		
FSC-PRO-40-003 V1-1	Development of National Group Chain of Custody Eligibility Criteria		
FSC-PRO-40-003a	List of Approved Group Chain of Custody Eligibility Criteria		

YOUR FEEDBACK

1. 規格を統合するという提案にどの程度賛成ですか？
1. To what extent do you agree with the proposal for combining standards.

- Strongly agree **強く賛成**
- Agree **賛成**
- Neutral **中立**
- Disagree **反対**
- Strongly disagree **強く反対**

2. Please provide the rationale for your answer and/or any suggestions for improvement.

2. 回答の理由や改善案があればご記入ください。

3. CoC 要求事項のデジタル化にどの程度賛成しますか？

3. To what extent do you agree with the proposal for digitization of the CoC requirements.

- Strongly agree **強く賛成**
- Agree **賛成**
- Neutral **中立**
- Disagree **反対**
- Strongly disagree **強く反対**

Please provide the rationale for your answer and/or any suggestions for improvement.

回答の理由や改善案があればご記入ください。

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

2. FSC 表示

2. FSC Claims

2.1. Claiming 100% reclaimed products as FSC Mix

ADVICE-40-004-17 currently supersedes Clause 5.9 of FSC-STD-40-004, by allowing 100% reclaimed materials to be claimed as FSC Mix. Clause 5.9 of FSC-STD-40-004 (and the note in particular) originally attempted to address the risk of misinterpretation (and potentially of "greenwashing") by setting a boundary between 100% reclaimed materials and FSC Mix. In addition, an FSC Mix claim (and label) inherently implies that the product contains (at least some) virgin material (see Annex C of FSC-STD-50-001).

The concept of ADVICE-40-004-17 is largely supported by CHs, especially in cases where the use of a single claim optimizes the trading process (i.e., FSC Mix output claim regardless of whether the input is FSC 100%, FSC Mix or FSC Recycled). However, maintaining it does not address the risk of misinterpretation highlighted by some stakeholders, and would require FSC to change its messaging on FSC Mix related trademarks.

2.1.1 Downgrade FSC Recycled credit into FSC Recycled x%

Some stakeholders have requested clarification (via a normative reference) on the possibility to downgrade FSC Recycled Credit to FSC Recycled x%, similar to the case of FSC Mix (see Clause 5.9 of FSC-STD-40-004, Figure A). FSC will therefore work on such change (also considering the topic in Section 2.1).

2.2. FSC CW + FSC Recycled inputs in the transfer system

Under the current standard, organizations under the transfer system using a combination of FSC CW and FSC Recycled inputs cannot make an FSC claim (see Clause 5.9, Table D of FSC-STD-40-004). However, in V2-1 of FSC-STD-40-004, this combination of inputs was possible with a corresponding FSC CW output claim.

Feedback received highlighted that the current requirements have prevented organizations from procuring FSC-claimed material, especially procurement of FSC Recycled, and in situations where all inputs cannot be sourced with the same FSC claim. It has also affected the downstream supply chain, where further processing is required and the use of FSC-STD-40-005 and FSC-STD-40-007 is not feasible.

Proposal:

Under the transfer system, combining FSC Recycled and FSC CW will result in an FSC CW output claim.

2.3. FSC CFM with claim-contribution

Controlled Forest Management (FSC-STD-30-010 V3-0) has introduced a new output claim, FSC CFM, to incentivize controlled forest management, and to distinguish it from forest products sourced as controlled material or FSC Controlled Wood (CW) that conform to FSC-STD-40-005.

ADVICE-40-004-27 introduces this new claim in the CoC system and sets the minimum requirements for its control. It maintains the same restrictions as applies for FSC CW (e.g., products must be raw or semi-finished and sold only to CHs; no claim-contribution), with the exception that FSC CFM claimed materials are considered FSC certified unlike FSC CW.

A workshop open to all stakeholders was held on 27 September 2023 (see report here). The main objectives were to introduce the new claim and to engage in a discussion on a possible FSC CFM claim-contribution to the chain of custody certification. Most of the participants supported some percentage of claim-contribution, and out of the options provided, 70% was the preferred claim-contribution (e.g., in a credit system, if 10 kg are received, 7 kg count as claim-contributing input).

Adding a contribution to the FSC CFM claim could be an important incentive for CFM-CHs and a recognition of the efforts of moving towards forest management certification based on full set of requirements of the applicable locally adapted Forest Stewardship Standard (FSS).

YOUR FEEDBACK

5. ご希望のオプションをお選びください

5. Please select your preferred option

- Keep concept from ADVICE-40-004-17 **ADVICE-40-004-17 のコンセプトの継続**
- Reinstate restriction from Clause 5.9; **5.9 項の制限を復活させる**
- Other (please explain in question below) **その他(次の回答欄に理由をご記入ください)**

6. Please provide the rationale for your answer and/or any suggestion for improvement.

6. 回答の理由や改善案があればご記入ください。

7. FSC CW と FSC リサイクルインプットの組み合わせに対して、FSC CW アウトプット表示を適用することにどの程度賛成しますか？

7. To what extent do you agree with applying the FSC CW output claim for a combination of FSC CW and FSC Recycled inputs.

- Strongly agree **強く賛成**
- Agree **賛成**
- Neutral **中立**
- Disagree **反対**
- Strongly disagree **強く反対**

8. Please provide the rationale for your answer and/or any suggestions for improvement.

8. 回答の理由や改善案があればご記入ください。

9. FSC CFM の表示寄与案 (70%) にどの程度賛成しますか？

9. To what extent do you agree with the proposed claim-contribution for FSC CFM?

- Strongly agree **強く賛成**
- Agree **賛成**
- Neutral **中立**
- Disagree **反対**
- Strongly disagree **強く反対**

10. Please provide the rationale for your answer and/or any suggestions for improvement.

10. 回答の理由や改善案があればご記入ください。

11. FSC ミックス/リサイクルクレジットを FSC ミックス/リサイクル 100% に置き換える変更案にどの程度賛成しますか？

11. To what extent do you agree with the proposed change to FSC Mix/Recycled 100% to replace FSC Mix/Recycled Credit?

- Strongly agree **強く賛成**
- Agree **賛成**
- Neutral **中立**
- Disagree **反対**
- Strongly disagree **強く反対**

12. Please provide the rationale for your answer and/or any suggestions for improvement.

12. 回答の理由や改善案があればご記入ください。

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

3. 木材合法性についての要求事項

3. Timber legality Requirements

FSC has developed the FSC-STD-01-004 V1-0 FSC Regulatory Module (published and effective on 1 July 2024) to assist CHs in aligning their practices with the requirements of Regulation (EU) 2023/1115 (EUDR), as a complementary ('add-on') standard to the existing FSC requirements.

In order to maintain its global and general application, it is proposed not to change the current Section 6 (of FSC-STD-40-004). Country specific or regional legislations [e.g., Australian Illegal Logging Prohibition Act, Forest Risk Commodities ('UKDR'), US Lacey Act] can be specifically addressed in the FSC Regulatory Module (or similar process) and applied by CHs according to their scope of certification.

Minor changes to the wording of Section 6 may still apply, in order to maintain an up-to-date relevance.

Proposal:

Specific legality requirements will be kept in a complementary standard.

Supporting documents:

[FSC-STD-40-004 V3-1 EN Chain of Custody Certification.pdf](#)

[FSC-STD-40-004 V3-1 ES Chain of Custody Certification.pdf](#)

[FSC-STD-40-003 V2-1 ES Certificación de Cadena de Custodia de sitios múltiples.pdf](#)

[FSC-STD-40-003 V2-1 EN COC-certification-of-multiple-sites.pdf](#)

[FSC-STD-40-007 V2-0 EN Sourcing reclaimed material for use in FSC Product Groups or FSC Certified Projects.pdf](#)

[FSC-STD-40-007 V2-0 ES Estndar FSC para el Suministro de Material Recuperado para Su Uso en Grupos de Producto FSC o Proyectos Certificados FSC.pdf](#)

[FSC-PRO-40-003 V1-1 EN Development of National Group Chain of Custody Eligibility Criteria.pdf](#)

[FSC-PRO-40-003 V1-1 ES Desarrollo de Criterios de Elegibilidad Nacionales para Cadena de Custodia en Grupo.pdf](#)

[CoC Workshop-synopsis-report Final 1482024.pdf](#)

[PSU Circularity_report.pdf](#)

[CoC Conceptual-phase-Report_EN.pdf](#)

[CoC Conceptual-phase-Report_ES.pdf](#)

YOUR FEEDBACK

13. 具体的な合法性要求事項を、補完的な規格の中に留めることについてどの程度賛成しますか？

13. To what extent do you agree with keeping specific legality requirements in a complementary standard?

- Strongly agree **強く賛成**
- Agree **賛成**
- Neutral **中立**
- Disagree **反対**
- Strongly disagree **強く反対**

14. Please provide the rationale for your answer and/or any suggestions for improvement.

14. 回答の理由や改善案があればご記入ください。

PREVIOUS SECTION

NEXT SECTION

3. Timber legality Requirements

19%

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

4. 労働要求事項

4. Labour requirements

With understanding that the inclusion of the FSC Core Labour Requirements (CLR) presented major change for stakeholders in Version 3-1, changes to this section include only the implementation of motions that were voted for by membership, alignment with International Labour Organization's (ILO) [Fundamental Principles and Rights at Work](#) (adopted in 1998 and amended in 2022), and improvements based on recommendations from ASI reporting and in response to stakeholder enquiries.

4.1. Expanding the universal requirements

In the [Review Report](#), it was considered that any expansion to the requirements related to CLR should be conducted with caution, and therefore the following changes are presented to align and improve clarity. Any amendments for the certification standard requirements will ensure to be considered in changes to the evaluation standard (FSC-STD-20-011).

4.1.1. Child Labour

Based on recommendations from ASI ('Legal Framework and Country Risk Analysis Report', see related news item [here](#)), the current requirements do not provide any different requirements for developing countries, as provided in [ILO Convention No.138 on Minimum Age](#). The slight changes for developing countries mean that the minimum working age can be 14 years old, provided that the work is not hazardous, and they have completed compulsory education. This change has a knock-on effect on the definition of 'light work' where the age can be 12-13 years. This change will impact limited countries, where the legal working age is defined as less than 15-years old.

4.1.2. Forced and Compulsory Labour

The current provisions in clause 7.3 do not explicitly reference prison labour. As a topic of various enquiries in relation to activities provided in the scope of certification, in the context of both the organization itself and activities conducted via outsourcing agreement, this element would be clarified for both circumstances, with a relevant definition added in the Terms and Definitions section. This will also aim to clarify application in cases where prison labour is placed at the disposal of private enterprises (see [C029, Article 2.2c](#)).

Additionally, the report by ASI ('Legal Framework and Country Risk Analysis Report', see related news item [here](#)) noted that clause 7.3 does not include all indicators of forced labour. Although clause 7.3.2 caveats that the list provided is non-exclusive, further examples will be added e.g. 'abusive working and living conditions' to cover situations where accommodation is provided for workers (see [ILO publication](#) for reference).

4.1.3 Discrimination

To align with the ILO Conventions, and based on the report by ASI ('Legal Framework and Country Risk Analysis Report Summary of Project Outputs & Deliverables' see related news item [here](#)), the discrimination element will include reference to 'equal work, equal wage', with reference to the [ILO Convention on Equal Remuneration \(C100\)](#), which provides for 'equal pay for work of equal value'.

4.2. Incorporation of Members' Motions in the FSC Core Labour Requirements

4.2.1. Motion 50/2021 and the Right to Freedom of Association

The [member motion](#) provides for the right of access to be included, to ensure that trade unions can freely access workplaces to engage with workers, and is applicable to both CoC and FM. The objective is to ensure that worker organization/trade union representatives can access workers 'at first request', with management providing information on worker whereabouts and ensuring no interference with related meetings (full detail is available [here](#)).

Under Clause 7.5 of the FSC-STD-40-004, more clarity will be provided on the right of access for workers' organizations, in situations where either workers are already members of these organizations or not.

YOUR FEEDBACK

15. 提案されている強制労働、児童労働、差別に関する変更例について、特に懸念する点がありますか？

15. Do you have any specific concerns on any of the example changes on forced labour, child labour, and discrimination proposed?

- Yes はい
 No いいえ

16. Please detail these specific concerns.

16. 具体的な懸念事項を詳しく教えてください。

17. Are there other elements of the current CLR that should also be revised? Please include, for example, terms and definitions to be amended.

17. 具体的な懸念事項を詳しく教えてください。

18. OHAS に対する一般的なコミットメントをセクション 1 に残し、主な要求事項はセクション 7 に残すという提案に賛成しますか？

18. Do you agree with the proposed suggestion to retain a general commitment to OHAS within Section 1, while keeping the main new requirements in Section 7?

- Yes はい
 No いいえ

19. If you answered 'No' to Q18, please provide your rationale.

19. Q18 で「いいえ」の答えた方は、その理由をご記入ください。

20. Please provide any immediate concerns you have on the inclusion of OHAS within Section 7 (FSC CLR)?

20. セクション 7 (FSC 中核的要求事項) に OHAS が含まれることについて、差し迫った懸念があればご記入ください。

21. 定量的な情報 (労働者数、性別、タイプなど) を把握することは、利害関係者にとって大きな課題になると思いますか？

21. Do you consider the capture of quantitative information (e.g. worker number, gender, type) would present a major challenge for stakeholders?

- Yes はい
 No いいえ

22. If you answered 'Yes' to Q21, please provide your rationale, or suggest an alternative document or method to capture this data.

22. Q21 で「はい」と回答した場合、その理由を示すか、このデータを収集するための別の文書や方法を提案してください。

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

5. 製品グループと管理システム

5. Product Groups and Control systems

5.1. Species information within the CoC system

The identification of species (including scientific and common names) has been a key integrity topic for FSC (e.g., Clause 6.1 b) of FSC-STD-40-004, ADVICE-40-004-20 V2-0, FSC Wood ID program). FSC-ADVICE-40-004-19 superseded Clause 8.3 c) of FSC-STD-40-004, requiring the species information in all cases, except for reclaimed materials and paper components in assembled products (provided it didn't conflict with applicable timber legality legislation). The advice note was withdrawn in December 2020 due to implementation challenges, which were resulting in negative impacts on CHs.

Timber legality and anti-deforestation regulations are reinforcing the importance of transparency in species information. FSC is therefore re-opening this topic for consideration, on the basis that clear requirements for recording and storing the information should be established, relevant interpretations (i.e., INT-STD-40-004_40, INT-STD-40-004_41) are included, and the verification system for species information is improved. At minimum, the organization should be required to identify the species in its product groups, where this information is also required by applicable legislation.

Note: FSC Trace can facilitate the species identification between CHs in the supply chain, at a product-specific level.

Proposal:

One of the following scenarios is proposed for incorporation in the revision:

- Scenario A: All certificate holders are required to provide their species information; or
- Scenario B: Species information is only required when required by the legislation.

5.2. Cross- credit/ percentage systems

Clauses 10.4 c) and 11.3 c) of FSC-STD-40-004 V3-1 allow organizations to share credit/percentage volumes across multiple sites in the same country or in the Eurozone. Since 2021, FSC launched a pilot project to investigate the potential of expanding the requirements to organizations with a multisite certificate and physical sites in the following regions which share similar characteristics with the Eurozone, including:

- Canada and the United States of America (US) (North America);
- Non-Eurozone and Eurozone countries of the European Economic Area (EEA).

Each site participating in cross-site accounts shall contribute at least 10% of the input credit (and 50% of the input percentage). Pilot participants confirmed that the extension would contribute to the growth of the FSC system by offering several benefits, such as reducing transportation costs, better logistics and resource planning, efficient usage of FSC credits, and broadening of the FSC-certified products/offers on the marketplace. However, concerns about the across borders have been raised. Therefore, it is essential to engage further with interested stakeholders to address and alleviate their concerns and discover the growing opportunities for the FSC scheme.

For updated information, please see the process page of the pilot project.

YOUR FEEDBACK

23. CoC システム内の樹種情報について、ご希望の選択肢をお選びください。

23. Regarding species information within the CoC system, please select your preferred option.

- Specie **全てのケースにおいて樹種情報が求められる**
- Specie **法令で義務付けられている場合のみ樹種情報が求められる**
- Other (**その他(次の回答欄で詳細を説明して**

24. Please provide the rationale for your answer and/or any suggestions for improvement.

24. 回答の理由や改善案があればご記入ください。

25. 10.4 c)項、第 11.3 c)項の適用範囲をカナダ/米国地域またはまたは EEA に拡大することにどの程度賛成しますか？

25. To what extent do you agree with expanding the scope of clauses 10.4 c) and 11.3 c) to Canada/US/Eurozone/EEA?

- Strongly agree **強く賛成**
- Agree **賛成**
- Neutral **中立**
- Disagree **反対**
- Strongly disagree **強く反対**

26. 10.4 c)項、第 11.3 c)項の適用範囲をカナダ/米国地域またはまたは EEA に拡大するという案について、以下からご希望の選択肢を全てお選びください。

- クレジット/パーセンテージ管理システムのための国境を超えたモデルは FSC 認証材が希少であるったり、普及が遅れている地域での FSC 表示/商標の知名度を高める
- クレジット/パーセンテージ管理システムのための国境を超えたモデルはたとえ調達先がその全てを FSC ジョブ・オーダーに処理できなくてもより多くの原材料調達を容易にする。
- この提案は、遠隔にあり、現在 FSC 認証材が不足している地域における認証の普及促進に貢献するものである。
- 将来的に他の経済地域も参加できるよう、一定の基準を設けなければならない。

27. 10.4 c)項、第 11.3 c)項の適用範囲をカナダ/米国地域または他にご意見はありますか？

28. 貴社がユーロ圏で CoC 認証を保有している場合、10.4 c)項、および 11.3 c)項の要求事項の貴社の現在の実施状況に最も近い回答を選択してください。(該当するものすべて)

- 現在の要求事項を完全に支持する
- マルチサイト認証取得者は、ユーロ圏内の国境を超えて管理システムを設定し、システムを監視することができる。
- マルチサイト認証取得者は、ユーロ圏内の国境を超えて管理システムを設定することはできない。
- この質問は私の仕事の範囲とは関係ない。

質問 29

CONSULTATIONS **ABOUT** **MY PROFILE** **LOG OUT**

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

6. 複合材料

6. COMPOSITE MATERIALS
6.1. Exploring how neutral materials should be accounted for in FSC products

FSC products made of both neutral materials and FSC-certified components that cannot be distinguished shall only be labelled and claimed as FSC Mix (see ADVICE-40-004-15). For example, a garment made of 95% cotton and 5% FSC-certified viscose with an FSC 100% claim, can only carry an FSC Mix claim and label. This requirement was introduced to address the issue of misleading claims on FSC products with a potential risk to FSC's credibility.

The review Report with stakeholders revealed polarized opinions on this topic. However, there is a consensus that potentially misleading claims should be avoided, in line with upcoming national and regional 'anti-greenwashing claims' regulations, e.g., the EU Green Claims Directive.

Proposals:

In the revision, FSC proposes the following scenarios for consideration:

- Scenario A: Keep the concept from ADVICE-40-004-15; or
- Scenario B: ADVICE-40-004-15 is only mandatory where FSC content is below a defined threshold (e.g., <30%); or
- Scenario C: Specify the FSC content/percentage within a product (on sales documents and additional text to the FSC label – while maintaining the original claim/label, e.g., FSC 100%);

YOUR FEEDBACK

29. ご希望のオプションをお選びください

29. Please select your preferred option:

- Keep ADVICE-40-004-15 **ADVICE-40-004-15 を継続する**
- Define threshold for ADVICE-40-004-15 **ADVICE-40-004-15 の閾値を定める**
- Specify FSC content **FSC の含有率を指定する**
- Other (please explain in next question) **その他(次の回答欄に理由をご記入ください)**

30. Please provide the rationale for your answer and/or any suggestion for improvement.

30. 回答の理由や改善案があればご記入ください。

質問 31

CONSULTATIONS **ABOUT** **MY PROFILE** **LOG OUT**

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

7. 外部委託

7. Outsourcing
7.2. Evaluating disassociated organizations operating as outsourcing contractors

With the implementation of ADVICE-40-004-16 (Disassociated organizations operating as outsourcing contractors), Clause 13.4 e) is not currently applicable. FSC still considers the requirement relevant for its integrity and alignment with the FSC-POL-01-004 Policy for Association. Instead of a self-disclosure by the contractor, FSC will explore other mechanisms to enable the organization to identify these disassociated organizations, e.g., publicly available list by country, notification through FSC Trace.

As well as being relevant to Section 13, this suggestion links to the provisions of ADVICE-40-004-18 (V2-0) (Addressing Deliberate False Claims), which safeguard CHs from inadvertently developing business relations with organizations that have made false claims and/or have been blocked from the FSC system.

YOUR FEEDBACK

31. 外部委託に関する要求事項の方向性の変更にとどの程度賛成しますか？

31. To what extent do you agree with the directional changes to outsourcing requirements?

- Strongly agree **強く賛成**
- Agree **賛成**
- Neutral **中立**
- Disagree **反対**
- Strongly disagree **強く反対**

32. Please provide the rationale for your answer and/or any suggestions for improvement.

32. 回答の理由や改善案があればご記入ください。

質問 33~35 (この時点で終了までの到達率 50%)

CONSULTATIONS

ABOUT

MY PROFILE

LOG OUT

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

8. 「小規模企業」一動議 28

8. "SMALL-ENTERPRISES" – MOTION 28

8.1. Introducing a definition for "Small Enterprises"

Current chain of custody normative framework lacks provisions for small enterprises, specifically in the context of "single certification". The closest provision that currently exists for small enterprises is included in the context of group certification, where organizations shall conform to the specified threshold to be eligible for group certification. Therefore, the addition of a generic definition for small enterprises is considered potentially beneficial for the system.

A new definition for "Small Enterprises"

The proposed criteria for organizations to be eligible as "small enterprises" is:

- No more than 15 full-time equivalent employee; AND
- No more than 2 million USD total annual turnover

On provision of an agreed definition of "small enterprise", the following changes are proposed:

- Identification: Organizations can be identified as "small" and are indicated as such on FSC database (voluntary).
- Claim: Organizations that are classified as "small", can include this information in their claim and pass it along the supply chain using the following statement "[name of organization] is certified as a small enterprise by FSC"
- Labelling: An organization that is classified as a "small enterprise" and uses the FSC trademarks, may utilize the designated "small enterprises" label. FSC-STD-50-001 V2-1 provides 2 labels (FSC
- The 2 million USD threshold to be linked to the annual adjustments of AAF (i.e., annual increase rate in AAF to be applied to the 2 million threshold).
- Amended Definition of "community producer": Definition in FSC-STD-40-004 to be adjusted to refer to "small enterprises" in chain of custody system.

Note: Organizations are not required to source exclusively from SLIMF

YOUR FEEDBACK

33. 「小規模企業」に対する新たな規定を導入することにどの程度賛成しますか？

- Strongly agree 強く賛成
- Agree 賛成
- Neutral 中立
- Disagree 反対
- Strongly disagree 強く反対

34. Please provide the rationale for your answer and/or any suggestions for improvement.

34. 回答の理由や改善案があればご記入ください。

35. 「小規模企業」の基準はどうあるべきだと思いますか？

35. Please provide the criteria for "small enterprises"?

- 正社員数の上限のみ
- 年間総売上高の上限のみ
- 従業員数と年間総売上高両方についての上限
- その他

36. Please provide the rationale for your answer and/or any suggestions for improvement.

36. 回答の理由や改善案があればご記入ください。

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

9. グループおよびマルチサイト認証

9. Group and Multi-site Certification
9.1. Group Certification Requirements

Due to the concerns raised regarding the generic criteria on group certification and the need to align the requirements according to the current socio-economic aspects of the different value chains in different regions,

The current requirements for organizations to be eligible for group certification are:

1. No more than 15 employees (full time equivalent); or
2. No more than 25 employees (full time equivalent) and a maximum total annual turnover of US\$ 1,000,000.

For the revision, PSU propose the following two scenarios for group certification eligibility:

- Scenario A: Removing the thresholds and leaving it to organizations to decide to join groups or have a single CoC certification.
- Scenario B: Using the established classifications of AAF in FSC-POL-20-005. In this option, organizations falling under Class 2, would be eligible for group certification.

Table 3. AAF classes for different organizations (Source: FSC-POL-20-005)

Class	Forest Products Turnover	Processor Base (USD)	Processor Variable (USD)	Trader Base (USD)	Trader Variable (USD)
Class 1	0 – 1 Million	0.00	618.18	0.00	185.45
Class 2	> 1 – 5 Million	618.50	202.31	185.88	60.70
Class 3	> 5 – 25 Million	1428.32	84.30	429.37	25.29
Class 4	> 25 – 100 Million	3114.26	33.72	935.907	10.12
Class 5	> 100 – 500 Million	5643.70	20.23	1695.72	6.07
Class 6	> 500 – 2,000 Million	13735.33	16.86	4121.90	5.06
Class 7	> 2,000 Million	36024.38	14.05	11703.729	4.22

YOUR FEEDBACK

37. CoC グループ認証の改定には、どちらの選択肢がより適当だと考えますか？

- Scenario A シナリオ A
 Scenario B シナリオ B
 Other (Please elaborate) その他(次の回答欄で説明してください)

38. Please provide the rationale for your answer and/or any suggestions for improvement.

38. 回答の理由や改善案があればご記入ください。

39. In your view, should the cap on the number of participating sites be set at 500, or would a higher or lower threshold be more appropriate?

39. 参加サイト数の上限を500にすべきか、もっと高い、あるいはもっと低い閾値の方が適当か、ご意見をお聞かせください。

※質問 37 のシナリオは以下のとおり。(詳細は「構想段階報告書日本語参考訳」参照)

Scenario A: Removing the thresholds and leaving it to organizations to decide to join groups or have a single CoC certification.

シナリオA：閾値を撤廃し、グループに参加するか、単独のCoC認証を取得するかは組織の判断に任せる。

Scenario B: Using the established classifications of AAF in FSC-POL-20-005. In this option, organizations falling under Class 2, would be eligible for group certification.

シナリオ B：FSC-POL-20-005の既存のAAF分類を使用する。この選択肢では、クラス2に該当する組織がグループ認証の対象となる。

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

10. 回収原材料と循環性

10. RECLAIMED MATERIAL AND CIRCULARITY

10.1. Material Inspection and Supplier Audit Program

The material inspection and supplier audit program in FSC-STD-40-007 will be revised for clarity, with more detailed guidance to facilitate its application. The proposed changes aim to streamline the material inspection and audit process and reduce the resource needs. The proposals include specifying when on-site audits are required and, the feasibility and effectiveness of remote audits for traders or sales offices that do not take physical possession. A detailed non-normative guidance document for the Supplier Audit Program will also be considered.

10.2. Inclusion of New Circularity Concepts

A detailed report which examines the inclusion of circularity concepts in the FSC system can be found here ()

10.2.1. Leasing and Take-back Solutions

The growing emphasis on circular economy principles, driven by evolving legislation and consumer demand, has prompted stakeholders to propose the introduction of take-back and leasing of FSC-certified products within the Chain of Custody Certification scheme. These concepts are briefly explained below.

Leasing

The proposed leasing solutions seek to allow organisations to lease FSC-certified products to other parties (see also Section 7.1). The report suggests that certified products retain their original certification status while being leased to other parties. Therefore, no additional claim would be created for leased products, however organisations could use FSC trademarks to promote leased products (e.g., off-product statements). It is proposed that only solid products with constant shape, form, and unique identifiers be included in this model to prevent risk of mixing with non-certified products and undermining FSC's integrity.

Take-back

Take-back programs are a type of circular economy model, which, in the context of FSC, aim to recover unused FSC-certified products to ensure their reuse and integration into the FSC supply chain. Under this proposed system, customers would be able to return unused volumes or portions of products to the originating organization, with the products' certification status remaining valid. Take-back is a concept that is potentially or already being practiced by many organisations, however the current CoC standards do not address this practice. Thus, the inclusion of this concept presents the opportunity for FSC to set clear requirements to regulate the re-entry of unused certified product into FSC supply chains.

As the FSC CoC standards have been focusing primarily on the legal ownership transfer and therefore do not regulate the proposed circular business models, such as leasing or take-back, the revision presents the opportunity to promote these models in the FSC system. FSC is seeking stakeholders' opinions to ensure that the proposed take-back and leasing models align with sustainability goals and meet the needs of various stakeholders.

10.2.2. Circularity Concept for Further Consideration Repair and Reuse

Stakeholders have suggested for FSC to consider the potential inclusion of a repair and reuse circularity concept within its system. To realise this suggestion, it is recommended that FSC develops and creates a 'Reuse claim' for used FSC-certified products that can be repaired and reused.

However, stakeholders have raised concerns regarding the complexity of this proposal and the possible undermining of 'regular' FSC claims, if a 'Reuse claim' was added. Some stakeholders assert that used products could already be reclaimed as post-consumer material for FSC Recycled claims, and therefore creating a 'Reuse claim' may be redundant and not add much value. On the contrary, other stakeholders provide that post-consumer reclaimed material currently must undergo major transformations for inclusion into other products groups, while certain products can merely be repaired and used without major transformation or recycling process, and therefore the proposed claim could be useful.

YOUR FEEDBACK

40. 提案されている変更は、原材料受入検査・監査プロセスを合理化

40. the する上で、どの程度効果的であると考えますか？

- Very effective 非常に効果的
- Effective 効果的
- Neutral 中立
- Not effective 効果的ではない
- Not effective at all まったく効果的ではない

41. What specific challenges or opportunities do you foresee in implementing these proposed changes?

41. これらの変更案を実施するにあたり、具体的にどのような課題や機会があると思いますか？

42. FSC が循環概念に回収モデルを組み込むことにどの程度賛成ですか？

42. To what extent do you agree that FSC should incorporate take-back models into its circularity concepts?

- Strongly agree 強く賛成
- Agree 賛成
- Neutral 中立
- Disagree 反対
- Strongly disagree 強く反対

43. Please provide the rationale for your answer and/or any suggestions for improvement.

43. 回答の理由や改善案があればご記入ください。

44. FSC がリースモデルを循環概念に組み込むことにどの程度賛成

44. To what extent do you agree that FSC should incorporate leasing models into its circularity concepts? ですか？

- Strongly agree 強く賛成
- Agree 賛成
- Neutral 中立
- Disagree 反対
- Strongly disagree 強く反対

45. Please provide the rationale for your answer and/or any suggestions for improvement.

45. 回答の理由や改善案があればご記入ください。

46. 「再利用表示」が FSC の利害関係者の利益になることについて、

46. To what extent do you agree that a "reuse claim" would benefit FSC's stakeholders? どの程度賛成ですか？

- Strongly agree 強く賛成
- Agree 賛成
- Neutral 中立
- Disagree 反対
- Strongly disagree 強く反対

47. Please provide the rationale for your answer and/or any suggestions for improvement.

47. 回答の理由や改善案があればご記入ください。

質問 48～54

The proposed solution may require a consumer audit program to verify the composition and eligibility of each product for a 'Reuse claim' which could be a significant challenge for FSC.

Considering the complex nature of this proposal and the need for extended engagements, this proposal would not fit into this revision's timeline. However, FSC is open to consulting with various stakeholders on the demand, and benefits of granting a 'Reuse' claim for used products within the FSC system.

Co-Products

Co-products, such as sawdust and woodchips generated during primary manufacturing processes like lumber production, are currently sourced through FSC-STD-40-005. However, stakeholders recommend that some co-products (particularly sawdust) could be considered reclaimed material by including them in the requirements of FSC-STD-40-007, where mixing of inputs makes it unfeasible to apply FSC-STD-40-005. This suggestion could enable a valuable source of biomass to enter the FSC system. However, alongside this benefit are potential disadvantages, including potential regulatory challenges in the evaluation of these materials through the standard for sourcing reclaimed materials, as they are not classified as waste materials by certain legislations, such as the EU Directive 2008/98/EC. Additionally, there are potential risks associated with this proposal, such as compromising FSC integrity (unknown origin), incentivising the use of non-certified materials with risk of originating from unacceptable sources, misaligning with other international or national legislations and fewer environmental benefits.

Considering these risks and timeline of the revision process, the proposal to include co-products has been reviewed, including discussion in the CoC online workshop in September 2023, and FSC does not foresee that it will be included in the revision.

Salvaged Wood

Currently, salvaged wood (e.g., storm felled timber, logs washed onto beach shores) can only be sourced as a controlled material under FSC-STD-40-005. Because tracing the origin of salvaged wood is sometimes unfeasible, stakeholders have recommended it to be considered as a reclaimed material under FSC-STD-40-007.

The proposal to include salvaged wood as 'reclaimed material' could promote sustainable resource management and reduce landfill waste. Stakeholders also agreed that salvaged wood could be considered reclaimed, so long as this is in line with existing regulations (e.g., recognition of salvaged wood as waste material, collection rights granted by local authorities).

During the conceptual phase, the need for careful consideration of a risk-based approach to salvaged wood and alignment with regulatory requirements was highlighted. Therefore, as part of the revision process, FSC continues to seek stakeholder opinion in order to weigh up the potential benefits and risks to the FSC system.

Urban Waste Wood

Stakeholders suggested that FSC should consider the inclusion of certain urban trees (e.g., trees at the end of their life cycle, felled by natural occurrences and trees harvested due to risk to life and property) as reclaimed materials. This proposed change could reduce landfill waste streams and reduce the need for forest-based virgin materials. Stakeholders suggest that this would establish controls for urban waste wood sourcing, which currently may enter the supply chain unregulated.

However, consulted stakeholders caveated that materials should only be allowed if their origin can be traced with substantial proof that the materials would have ended up in a landfill. Additionally, they raised concerns about illegal logging and the social sensitivity of cutting down urban trees may attract negative public attention and therefore recommended that FSC develop a system to mitigate these risks.

Proposal:

FSC proposes to consider trees harvested in urban areas to be equivalent to 'post-consumer reclaimed material' with a system to

48. FSC の規格において、未使用回収木材を回収原材料として含める
48. To what extent do you agree that salvaged wood should be included as reclaimed material in the FSC standard?
ことにどの程度賛成ですか？

- Strongly agree 強く賛成
- Agree 賛成
- Neutral 中立
- Disagree 反対
- Strongly disagree 強く反対

49. Please provide the rationale for your answer and/or any suggestions for improvement.

49. 回答の理由や改善案があればご記入ください。

50. Do you foresee any risks for considering salvaged as reclaimed material?

50. 未使用回収木材を回収材として見なすことに何かリスクはありますか？

51. What measures should FSC implement to ensure the traceability and integrity of salvaged wood in the certification process?

51. 認証プロセスにおいて未使用回収木材のトレーサビリティと完全性を担保するために、FSC はどのような対策を実施すべきですか？

52. ポストコンシューマー回収原材料として都市部の木材を含めること
52. To what extent do you agree that FSC should include urban wood trees as post-consumer reclaimed material?
についてどの程度賛成しますか？

- Strongly agree 強く賛成
- Agree 賛成
- Neutral 中立
- Disagree 反対
- Strongly disagree 強く反対

53. Please provide the rationale for your answer and/or any suggestions for improvement.

53. 回答の理由や改善案があればご記入ください。

54. Do you foresee any regulatory and integrity risks associated with allowing urban waste trees as 'post-consumer reclaimed material'?

54. 都市部の廃棄樹木を「ポストコンシューマー回収原材料」として許可することに関して、法令上および FSC の完全性の上で何かリスクがあると思いますか？

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

11. FSC の取り組み

11. FSC INITIATIVES 11.1. CoC Procurement claims

Since 2020, FSC has initiated a pilot project to test the feasibility of enabling a verified procurement claim system within the scope of the FSC Chain of Custody. With verification from a certification body, an organization can make procurement claims for purchases of FSC raw materials, semi-finished products, and unlabelled finished products (which will be used for internal consumption and not further sold with a FSC claim) for chosen product categories.

The project aims to give extra recognition to the proportion of FSC-certified material that are is declassified in the market when they are distributed to companies that are not eligible for Promotional Use of FSC Trademark. During implementation, the project showed potential, such as recognising the use of FSC-certified materials in the market, raising awareness for the organization's staff, and providing better incentives to move to full CoC Certification.

Some requirements in the pilot project procedure are irrelevant to its objectives, preventing many organizations from participating e.g., a textile retailer buys rubber products from non-certified manufacturing factories. In this example, while its suppliers procure FSC-certified materials, they have low interest in pursuing FSC-CoC Certification. The retailer could not participate in the project because the current requirements do not permit such circumstances. Meanwhile, it has been discovered that the targeted users of the procurement claims are different from the users of the current Chain of Custody Certification. FSC is working on testing different approaches, such as applying procurement claim procedures separately or aligning the procedures with FSC-STD-40-004. Also, the requirements of the procurement claims would be made more flexible for changes to address the issues that arise.

For more information, please see the updated process page of the pilot project.

11.2. FSC IT Initiatives

The FSC Trace is currently being piloted and will be formally launched towards the end of 2024. The practical implementation will inform the revision process, aiming for a dedicated annex covering the requirements applicable for those CHs that opt for this tool (and CBs assessing those CHs, through FSC-STD-20-011). This technology brings the potential for CHs to automatically conform with some of the CoC requirements, such as Clauses 1.9, 2.1, 2.2, 4.2, 4.4, 5.6 (partially), of FSC-STD-40-004.

The revision process will also drive a few changes in the FSC certificate database, such as:

1. Improved visibility of the certification scope for the participating sites (in a multisite or group certification);
2. Provision of services expressed as an activity in the scope.

Currently, only FM certification requires a Digital Audit Report (DAR). For consistency and standardization, this should also be applied to CoC certification. However, FSC recognizes that before being implemented in the CoC system, the learnings from the DAR implementation should be considered for the creation a new generation of the DAR, before it can be prioritized in the revision process.

FSC is also proposing a modular approach with the digitization of requirements (see Section 1.2 for further information).

YOUR FEEDBACK

55. 検証済みの調達表示は、FSC 認証生産物の市場拡大に貢献する

55. To what extent do you agree that verified procurement claims will help increase the market for FSC-certified products? **という考え方にどの程度賛成ですか？**

- Strongly agree **強く賛成**
- Agree **賛成**
- Neutral **中立**
- Disagree **反対**
- Strongly disagree **強く反対**

56. Please provide the rationale for your answer and/or any suggestions for improvement.

56. 回答の理由や改善案があればご記入ください。

57. CoC についての FSC の IT 取り組み案についてどの程度

57. To what extent do you agree with the proposed FSC IT initiatives for CoC? **賛成しますか？**

- Strongly agree **強く賛成**
- Agree **賛成**
- Neutral **中立**
- Disagree **反対**
- Strongly disagree **強く反対**

58. Please provide the rationale for your answer and/or any suggestions for improvement.

58. 回答の理由や改善案があればご記入ください。

59. CoC の観点から優先すべき IT の取り組み事項を選択してください。

59. Please select the IT initiatives that should be prioritized from a CoC perspective

- FSC Trace requirements **FSC トレース要求事項**
- FSC database changes (e.g., improve) **FSC データベースの変更 (視認性向上等)**
- CoC Digital Audit Report **CoC デジタル監査報告**
- Modular approach **モジュラーアプローチ**
- Other (please elaborate in the next question) **その他(次の回答欄にご記入ください)**

60. Please provide the rationale for your answer and/or any suggestions for improvement.

60. 回答の理由や改善案があればご記入ください。

61. Regarding the 'automatic conformity' (exemption from applicability) of certain requirements through use of FSC Trace, please share any concerns and/or additional suggestions with the concept and examples provided.

61. FSC トレースの使用による特定の要求事項の「自然適合(適用除外)」について、懸念事項や追加提案等があれば、その概念および具体例と共にご共有ください。

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

13. FSC-STD-20-011 認定要求事項

13. FSC-STD-20-011: Accreditation requirements

13.2. Risk-based approach evaluations

13.2.1 Remote and hybrid evaluations

In line with the revision of FSC-STD-20-001 (see process page), there is an identified implementation need to review and revise the requirements for addressing extraordinary situations (e.g., pandemics, conflicts), considering the temporary derogations FSC issued in the past years. One such example is the , which allowed for CBs to conduct remote and hybrid evaluations based on risk scenarios. The implementation process of such policies provides the basis for consideration of an integrated risk-based approach to the evaluation method used (i.e., on-site, remote, hybrid); with this approach not restricted to application only in extraordinary situations. FSC will define the scenarios and risk factors where remote and hybrid audits can be carried out, with Annex A of the COVID-19 Policy Responses used as a starting point.

Note: New concepts such as 'low-intensity processing' may be considered as an additional activity type (in between trader and processor) when assessing the risk of mixing.

13.2.2 Waiving surveillance audits

Currently, Clause 3.3 of FSC-STD-20-011 V4-2 allows surveillance audits to be waived, however this waiver is restricted to no more than two consecutive evaluations in cases where the CH has not performed activities within the scope of certification. In practice, this means that out of the four surveillance audits, one or two surveillance audits must be conducted per certification cycle.

FSC proposes a change to allow only one surveillance audit to be waived, which would mean a default of at least two surveillance audits per certification cycle, with two as a minimum, depending on the specific surveillance audit being waived.

In addition, FSC may consider not granting a waiver for high-risk supply chains or species that pose a particular risk to FSC's integrity (see also section 11.2.3).

13.3. Evaluation of group and multisite chain of custody certificates

13.3.1 Changes to the sampling methodology of the participating sites

Currently CBs need to divide the participating sites into two groups, high-risk & low-risk, and then apply the formula for both groups. The example below is provided to highlight its current application.

Proposal:

Based on the integrity concern described in the background, the revision of the sampling methodology is proposed, with the modification to increase the audit sample size based on a risk-based approach. This entails:

- Revision of the risk factor for all CHs

To address identified integrity risks (including a score for high-risk countries in relation to CLR, organization with high-risk supply chains e.g., charcoal, in their scope or high-risk species with reference to ADVICE-40-004-20 V2-0);

- Percentage requirement for high-risk

Requiring 20% of high-risk participating sites/members to be included in the sample size for each evaluation or the use of the sampling formula, whichever is higher. This ensures that all high-risk members/sites have been evaluated at least once during a certificate cycle. As for the low-risk sites/members, CB can decide to use the formula or percentage threshold.

Table 7 Revised table A in FSC-STD-20-011 - Matrix for determination of risk [index](#)

Risk factor		Score	Score Given
Ownership	All participating sites have common ownership	0.1	
	Participating sites do not have common ownership	0.2	
Certificate size	0-20 participating sites	0.2	
	21-100 participating sites	0.3	
	101-250 participating sites	0.4	0.5
	> 251 participating sites	0.5	0.6
	> 400 participating sites	0.6	
Central office's performance	No CAR issued to the central office in the previous evaluation	0.1	
	Not applicable (there was no previous evaluation)	0.1	
	Only minor CARs in the previous evaluation	0.2	

YOUR FEEDBACK

62. 遠隔およびハイブリッド評価を含む一般的なリスクベースアプローチ 62. To what extent do you agree with a general risk-based approach to include remote and hybrid evaluations? にどの程度賛成ですか?

- Strongly agree 強く賛成
 Agree 賛成
 Neutral 中立
 Disagree 反対
 Strongly disagree 強く反対

63. Please provide the rationale for your answer and/or any suggestions for improvement.

63. 回答の理由や改善案があればご記入ください。

64. 年次監査を免除する(1サイクルにつき最大1回まで)という提案に 64. To what extent do you agree with the proposal for waiving surveillance audits (waiving a maximum of 0 どの程度賛成ですか?

- Strongly agree 強く賛成
 Agree 賛成
 Neutral 中立
 Disagree 反対
 Strongly disagree 強く反対

65. Please provide the rationale for your answer and/or any suggestions for improvement.

65. 回答の理由や改善案があればご記入ください。

66. 提案された新しいサンプリング方法にどの程度賛成ですか? 66. To what extent do you agree with the proposed new sampling methodology?

- Strongly agree 強く賛成
 Agree 賛成
 Neutral 中立
 Disagree 反対
 Strongly disagree 強く反対

67. Please provide the rationale for your answer and/or any suggestions for improvement.

67. 回答の理由や改善案があればご記入ください。

68. What other factors could be included to calculate the sample size of group members or multi-sites? 68. グループメンバーやマルチサイトのサンプル数を計算するために、他にどのような因子が考えられますか?

69. 評価規格内の各中核的労働要求事項に証拠要件を追加することは 69. Would you consider it beneficial to add evidence requirements for each core labour requirement within the evaluation standard? 有益だと思いますか?

- No いいえ
 Yes はい

70. How could the current Section 11 of FSC-STD-20-011 be improved? Please provide detail.

70. FSC-STD-20-011のセクション11はどのように改善できると思いますか?詳細をご記入ください。

質問 71～72

CONSULTATIONS	ABOUT	MY PROFILE	LOG OUT
---------------	-------	------------	---------

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

14. FSC-STD-20-001 V1-1: FSC の価値観および OHAS へのコミットメントに関する手順

FSC-PRO-20-001 V1-1: Procedure on Commitment to FSC Values and OHAS

14.1. Incorporation into other normative documents

14.1.1. Review

This procedure was made effective, with the aim to facilitate implementation of the 'new' requirements of commitment to the FSC Values (Policy for Association) and Occupational Health and Safety (OHAS). However, reviewing the procedure's continued validity, many elements of this Procedure were found to be already covered by other normative documents.

Since its publication in 2014, there have been subsequent changes to the CoC certification and evaluation standards, in addition to amendments to the related Policy for Association and License Agreements. For example, the commitment to FSC values is found in FSC trademark license agreement (TLA). For the CB, the auditable requirement in chain of custody is to check for this commitment, which is covered in clause 1.3 in FSC-STD-40-004.

Therefore, FSC proposes to 'withdraw' the Procedure (see section 14.1.2) and incorporate any outstanding elements into other chain of custody documents.

14.1.2. Recommendation for Incorporation

Review of this Procedure presents convincing argument for its

YOUR FEEDBACK

71. この手順 (FSC-STD-20-001 V1-1) を FSC-STD-20-011 に組み込むことを推奨する提案について、何か問題が起きると思いますか?

71. Do you foresee any issues with the proposed recommendation to incorporate this procedure (FSC-PRO-20-001 V1-1) into FSC-STD-20-011?

Yes はい

No いいえ

72. If you foresee any issues with proposed approach, please detail your concerns.

72. 問題があると思われる場合は、その懸念を詳しく記載してください。

質問 73～75

CONSULTATIONS	ABOUT	MY PROFILE	LOG OUT
---------------	-------	------------	---------

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

14. 付属書 I - CoC 規格改定の主な意図する成果

Annex 1 – Key intended outcomes for the revision of Chain of Custody Standards

As provided in the procedure on FSC-PRO-01-001 V4-0 The Development and Revision of FSC Requirements, during the conceptual phase, FSC members and stakeholders are encouraged to contribute to the key concepts and the formulation of key intended outcomes in the process being followed (see Section 5 of FSC-PRO-01-001 V4-0).

The topics outlined in the conceptual phase report for the revision of chain of custody standards are provided, in part, as result of the topics identified in the CoC Review Report, which gave the rationale for the revision and recommendations for what the revision process should include. Details, including two tables, are provided below to explain what have been identified as the key intended outcomes of the revision process, and how FSC can monitor their fulfilment. This section is currently a work in progress and will be further developed and expanded upon in the coming stages. We welcome your suggestions and feedback for improvement and encourage your input to help enhance the identified outcomes in part 1 and monitoring criteria in part 2.

Part 1 – Key Intended Outcomes

The recommended topics for inclusion in the revision have been grouped under the following three key intended outcomes:

Intended outcome 1: CoC integrity is enhanced

'System integrity' within the FSC context refers to the integrity, credibility, and transparency of the FSC system; ensuring FSC certification not only provides value but can be trusted. To safeguard integrity within the CoC

Supporting documents:

YOUR FEEDBACK

73. 意図する主な成果について、どの程度賛成しますか?

73. To what extent do you agree with the proposed key intended outcomes?

Strongly agree 強く賛成

Agree 賛成

Neutral 中立

Disagree 反対

Strongly disagree 強く反対

74. Please provide the rationale for your answer and/or any suggestions for improvement

74. 回答の根拠や改善案があればご記入ください。

75. In your opinion, what could be other indicators for addressing the key intended outcomes?

75. 主な意図する成果を達成するための指標として、他にどのようなものが考えられますか?

質問 76 (最後の質問です。)

CONSULTATIONS

ABOUT

MY PROFILE

LOG OUT

[ENGLISH/SPANISH] CONSULTATION ON CONCEPTUAL PHASE REPORT FOR THE REVISION OF CHAIN OF CUSTODY STANDARDS

DOCUMENT FOR REVIEW

Thank you so much for your participation in this consultation.

本コンサルテーションへのご参加、誠にありがとうございました。

YOUR FEEDBACK

76. Please share any additional comments on the conceptual phase report.

76. 構想段階報告書に関して、追加のコメントがございましたらご記入ください。

Supporting documents:

[FSC-STD-40-004 V3-1 EN Chain of Custody Certification.pdf](#)

[FSC-STD-40-004 V3-1 ES Chain of Custody Certification.pdf](#)

[FSC-STD-40-003 V2-1 ES Certificación de Cadena de Custodia de sitios múltiples.pdf](#)

[FSC-STD-40-003-V2-1-EN-COC-certification-of-multiple-sites.pdf](#)

[FSC-STD-40-007 V2-0 EN Sourcing reclaimed material for use in FSC Product Groups or FSC Certified Projects.pdf](#)

[FSC-STD-40-007 V2-0 ES Estndar FSC para el Suministro de Material Recuperado para Su Uso en Grupos de Producto FSC o Proyectos Certificados FSC.pdf](#)

[FSC-PRO-40-003 V1-1 EN Development of National Group Chain of Custody Eligibility Criteria.pdf](#)

[FSC-PRO-40-003 V1-1 ES Desarrollo de Criterios de Elegibilidad Nacionales para Cadena de Custodia en Grupo.pdf](#)

[CoC_Workshop-synopsis-report_Final_1482024.pdf](#)

[PSU_Circularity_report.pdf](#)

[CoC_Conceptual-phase-Report_EN.pdf](#)

[CoC_Conceptual-phase-Report_ES.pdf](#)

PREVIOUS SECTION

このボタンをクリックし、提出完了です。

SUBMIT

General comments

94%

Save current progress

Save current progress and exit