

FSC REGULATORY MODULE INFORMATION BOOKLET FOR CHAIN OF CUSTODY

The purpose of this booklet is to provide information on how FSC® can support compliance with the latest EU regulations, as well as aligning with global sustainability best practices for chain of custody users.

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As we embark on this journey toward harmonizing forest management certification with the demands of the EUDR, this add-on module serves as a bridge, further connecting FSC’s rigorous responsible forestry practices with regulatory expectations. By adopting this module, FSC certificate holders not only strengthen their commitment to environmental and social responsibility but also contribute to the overarching goal of eradicating illegal timber trade into and within the European Union.

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WELCOME TO THE INFORMATION BOOKLET



This information booklet is designed to help you navigate the process of gaining compliance with **REGULATION (EU) 2023/1115** (known as the European Union Regulation on Deforestation-free Products, EUDR) by using FSC Regulatory Module. It is an overview of the standard and should help you get started but for complete information please refer to the standard itself.

<https://connect.fsc.org/document-centre/documents/resource/1951>



Through this document, we will explain the benefits of this add-on, and the steps to support demonstrating EUDR compliance through the FSC Regulatory Module for **Chain of Custody** users.

INFORMATION BOOKLET



The structure of this booklet is as follows:

-
- 1** Abbreviations

 - 2** Introduction

 - 3** Part 1: Additional Requirements for Forest Management Certification

 - 4** Part 2: Additional Requirements for Chain of Custody Certification

 - 5** Part 3: Use of FSC Trademarks

 - 6** Definitions

 - 7** Reference documents

ABBREVIATIONS



Before getting into the content, we recommend that you familiarize yourself with the most important abbreviations that have been used across this document.

EUDR	European Union Regulation on Deforestation free Products
FSC	Forest Stewardship Council
FSS	Forest Stewardship Standard
DDS	Due Diligence System
FLEGT	Forest Law Enforcement, Governance and Trade

INTRODUCTION

WHAT'S HAPPENING?

- FSC has developed solutions to facilitate FSC certificate holders' efforts in demonstrating compliance with EU Regulations as well as global sustainability best practices.
- One solution is the development of this **FSC Regulatory Module** as an **add-on standard** to be used in addition to current FSC certification requirements for forest management, chain of custody, and controlled wood.
- This FSC Regulatory Module comprises new requirements to support compliance with legislation such as **EUDR**.



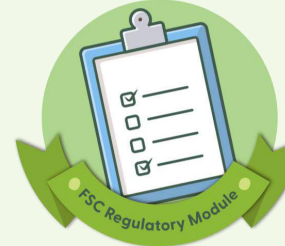
WHY DO IT?



1. Certificate holders who decide to get certified against this additional module will have a tool and additional independent assurance to support their efforts in demonstrating **compliance with EUDR requirements** as they can show competent authorities and other companies that relevant information has been gathered and due diligence exercised.



3. Certificate holders certified against this module are walked through risk assessment, mitigation and information collection requirements and have access to complementary templates and tools.



2. Companies who make use of the FSC Regulatory Module will be entitled to use a **'Regulatory Claim'** for their certified products.



4. Where the full supply chain is certified with the FSC Regulatory Module they can make deforestation-free promotional statements.

While certification bodies will check conformity with this module, the ultimate decision as to whether a company is compliant with EUDR remains with the relevant competent authorities.

WHAT'S THE BENEFIT?



The EUDR is a pivotal EU initiative to limit deforestation and degradation caused by forestry and agricultural activities all over the world and to promote the responsible sourcing of timber and timber products. Recognizing the significance of aligning due diligence practices with this regulatory landscape, FSC has developed the FSC Regulatory Module – a comprehensive and adaptive extension to existing standards.

The Regulatory Module is here to demystify complicated requirements of the EUDR and make the process simpler for all users by translating them into FSC Certification requirements.

The FSC Regulatory Module sets the framework and requirements to:

- introduce a due diligence system to support EUDR compliance, including information collection, risk assessment and risk mitigation
- gather and transmit precise information on the origin of products (geolocation and time of production), and
- ensure that only deforestation-free materials enter into FSC chain of custody.



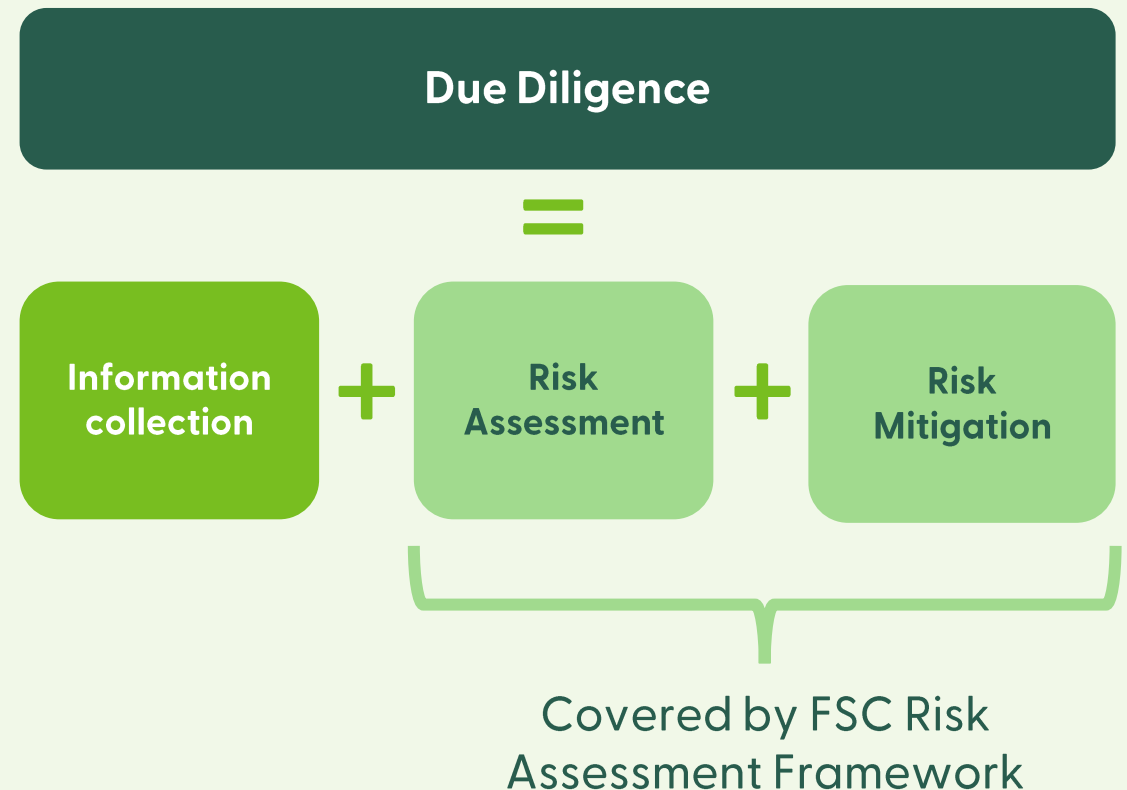


The EUDR places stringent requirements on operators placing timber and timber products in the EU market. By incorporating EUDR-specific criteria, definitions, documentation, and verification processes, this module ensures that certified forests not only meet ecological and social sustainability benchmarks but also adhere to the legal requirements outlined by the EUDR.

The due diligence systems in the FSC Regulatory Module are supported by FSC's Risk Assessments. The FSC Risk Assessments are based on the next generation of FSC's existing controlled wood risk assessment framework.

These Risk Assessments are a great benefit to companies but also a key tool for all stakeholders to ensure environmental and social values are included. FSC has extensive experience based on existing Controlled Wood Risk Assessments and are now introducing EUDR-aligned Risk Assessments through PRO-60-006b Risk Assessment Framework.

REGULATORY MODULE REQUIREMENTS





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VOLUNTARY ADD-ON MODULE

The FSC Regulatory Module is a complementary standard to add on to existing FSC certification requirements for forest management, chain of custody, project certification and controlled wood.

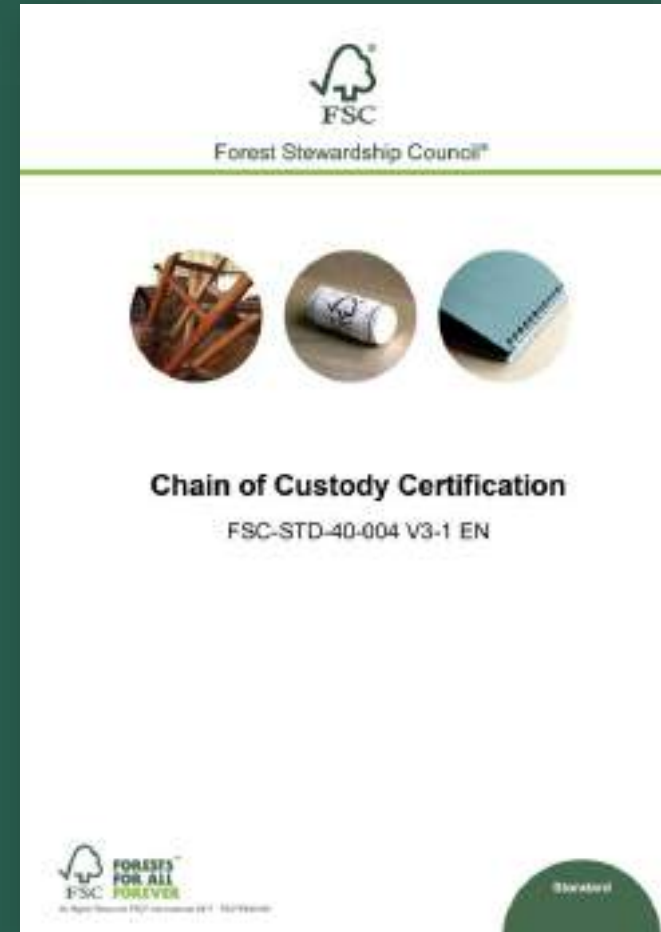
This standard is for **voluntary** use by organizations applying for or holding FSC certification to extend their certification scope in order to **align with EUDR**.

ADDITIONAL REQUIREMENTS FOR CHAIN OF CUSTODY CERTIFICATION



Let's get into **Chain of Custody Certification**.

In addition to the requirements established in FSC-STD-40-004 *Chain of Custody Certification* (<https://connect.fsc.org/document-centre/documents/resource/302>) you will need to meet the requirements outlined in the FSC Regulatory Module.



OVERVIEW OF DEFINITIONS OF USERS

SME (MICRO-, SMALL- AND MEDIUM-SIZED ENTERPRISE)

MICRO

In applying one or more of the options in Article 36, Member States shall define micro-undertakings as undertakings which on their balance sheet dates do not exceed the limits of at least two of the three following criteria:

- **balance sheet total:** EUR 350 000
- **net turnover:** EUR 700 000
- **average number of employees during the financial year:** 10

SMALL

Small undertakings shall be undertakings which on their balance sheet dates do not exceed the limits of at least two of the three following criteria:

- **balance sheet total:** EUR 4 000 000;
- **net turnover:** EUR 8 000 000;
- **average number of employees during the financial year:** 50.

Member States may define thresholds exceeding the thresholds in the first two points. However, the thresholds shall not exceed EUR 6 000 000 for the balance sheet total and EUR 12 000 000 for the net turnover.

MEDIUM-SIZED

Medium-sized undertakings shall be undertakings that are not micro-undertakings or small undertakings and which on their balance sheet dates do not exceed the limits of at least two of the three following criteria:

- **balance sheet total:** EUR 20 000 000
- **net turnover:** EUR 40 000 000
- **average number of employees during the financial year:** 250

OVERVIEW OF DEFINITIONS OF USERS

REGULATORY TRADER

Any person in the supply chain other than the operator who, in the course of a commercial activity, makes relevant products available on the market.



OVERVIEW OF DEFINITIONS OF USERS

OPERATOR

The Organization who, in the course of a commercial activity, places relevant products on the EU market or exports them. Also the organization that changes the Harmonized System code within the EU; for example when transforming products from rubber into a tire or converting panels into wooden furniture



CHAIN OF CUSTODY (COC) MANAGEMENT SYSTEM

All organizations are to confirm the following:

- The organization must maintain the records demonstrating conformity with the applicable requirements of the FSC Regulatory Module.
- The organization must ensure that new information that it obtains or is made aware of, including substantiated concerns, that would point to a risk that products do not conform with this standard, is adequately considered.
- The organization shall not place non-conforming products on the EU market or export them. Where non-conforming products are detected, the organization shall immediately inform the relevant competent authorities.
- The organization must notify the relevant competent authority in case of suspension of the FSC Regulatory module from its certification scope. The notification shall include the organization's certification body conclusion that led to suspension.
- The organization must upon request, provide all necessary assistance to the competent authorities, including access to premises and making documentation and records available.



COMPLIANCE WITH TIMBER LEGALITY LEGISLATION



On request, you may need to provide information on the following:

- Species
- Plot of land geolocation
- Time of production
- All complementary information to operators and regulatory traders further down the supply chain

This information supports the conclusion of negligible risk under their DDS, and therefore comply with timber legality legislation.



ESTABLISHMENT OF PRODUCT GROUPS FOR THE CONTROL OF FSC CLAIMS

FSC has much more detailed product groups in comparison to the Harmonized System (HS), nonetheless there needs to be an alignment. To learn more, visit the [HS information here](#).

FSC has developed a guidance document to help navigate and compare FSC product groups with Harmonized System codes.



DOWNLOAD CROSSWALK DOCUMENT

YOU NEED TO PREPARE FOLLOWING ADDITIONAL INFORMATION:

- a) Product group for the Regulatory Module
- b) Regulatory claim for output products
- c) Species (common and full scientific name of each species);
- d) Harmonized System code(s), with a minimum of six digits

DUE DILIGENCE FOR CHAIN OF CUSTODY CERTIFICATION

The objective of due diligence for the relevant products in the FSC Regulatory Module is to demonstrate that the following conditions are met:

- a) they are deforestation-free;
- b) they have been produced in accordance with the relevant legislation of the country of production;
- c) They are covered by a due diligence statement.

Evidence that a given material is not conforming with the above, shall qualify the material as **non-conforming products**.

NOTE: Wood products which fall within the scope of Regulation (EC) No 2173/2005 and covered by a valid FLEGT license from an operational licensing scheme are deemed to conform with b above.



DUE DILIGENCE SYSTEM (DDS) – GENERAL REQUIREMENTS



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CAN I BE EXEMPTED FROM CONDUCTING A DUE DILIGENCE? YES... IF:

- 1. [SME operators]:**
the material/product is already covered by a due diligence statement (issued by a supplier/sub-supplier and submitted to the competent authorities; and
- 2. [non-SME operators/non-SME traders]:**
only having ascertained that the due diligence was exercised according to the provisions of the Regulation.

The organization shall verify the due diligence statement (see page 13!)

DUE DILIGENCE SYSTEM (DDS) – GENERAL REQUIREMENTS

WHAT DO YOU, AS THE ORGANIZATION NEED TO DO?



Engage with the relevant suppliers and sub-suppliers to obtain clear and convincing evidence of conformance.



Verify the due diligence statement.



Provide the competent authorities with the reference number of the due diligence reference number(s) upon request.



DUE DILIGENCE - IMPLEMENTATION AND MAINTENANCE OF THE DUE DILIGENCE SYSTEM

HOW DO YOU DO THIS?

As the organization you need to implement, and maintain a documented Due Diligence System for material to be included in the FSC product groups within the scope of the FSC Regulatory Module.

You can choose to develop **your own DDS** or **apply a DDS developed by an external party**.



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WHY IS THIS DDS SO IMPORTANT?

You can only use material in FSC product groups in the scope of the FSC Regulatory Module and sell material with the Regulatory claim if it is in conformity with the requirements of this standard.

All suppliers and sub-suppliers of the material assessed according to this standard must also be included in your DDS.

NOTE: Suppliers and sub-suppliers are not expected to implement this standard, and it is the responsibility of the organization to ensure conformity. The organization may request suppliers to follow part(s) of this standard to achieve conformity.

This is an ongoing process...

Review, and if necessary, revise the due diligence system (DDS) at least annually and prior to the annual surveillance by the certification body, whenever changes occur that affect the relevance, effectiveness, or adequacy of the DDS.

3 NOTES TO CONSIDER...



Means to verify the relevance, effectiveness, or adequacy of the DDS may include, but are not limited to, stakeholder consultation, field verification and document verification, all of which may be included in internal audits.



Field verification may be conducted at the supply unit level or supplier/sub-supplier's site. When/if applied, the frequency and scope of field verification will depend on the risk identified by the organization in its DDS.



Stakeholder consultation, field verification, and document verification may also be implemented as control measures.

And that's not all...



Implement internal audits of its DDS at least annually to ensure that it is being implemented correctly.



Document all cases of the DDS being evaluated as ineffective during the internal audit and ensure that all relevant issues are addressed and corrected within 12 months of their detection.



Upon request, provide the due diligence statement and supporting information used to complete the due diligence statement, to users of the FSC Regulatory Module further down the supply chain.



Due Diligence steps for Chain of Custody Certification



DUE DILIGENCE THROUGH SUPPLY CHAIN

DDS

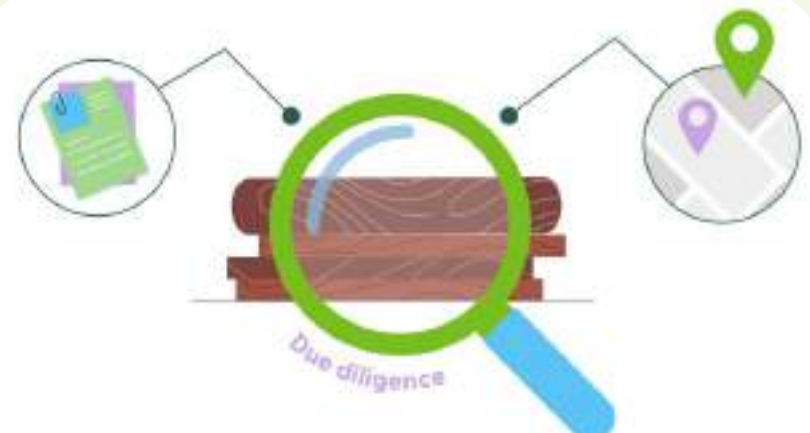


1



The Regulatory Module outlines due diligence for users throughout the supply chain

2



Including information gathering and geolocation

3



Which helps the supply chain to align with EUDR requirements

4




And receive a Regulatory claim

THE ORGANIZATION CAN CONDUCT A SIMPLIFIED DUE DILIGENCE IF:

- a) products have been produced in countries or parts thereof classified as low risk in accordance with the EUDR three-tier risk system; and
- b) the applicable FSC Risk Assessment has a negligible risk designation; and
- c) there is no available information, including substantiated concerns, that may affect the conformity of certification requirements.

This means that the organization is exempt from the application of the risk assessment and risk mitigation processes, provided the risk of mixing is addressed.



 In addition to the material sourcing requirement, the following information is required...

- a) the species (common and full scientific name of each species);
- b) the country of harvest and, where relevant, parts thereof;
- c) the geolocation of all plots of land where the material originates from;
- d) the date or time range of harvest (period defined by a start date and end date);
- e) applicable risk assessment (see slide 16);
- f) information about supply chains, [according to clause 4.10.7];
- g) reference to the respective FSC-certified Management Unit (if applicable).

The organization shall have access to information on its supply chains to a level that allows it to confirm and document:

- a) the origin of the material to the level of the plot of land;
- b) the risk related to the origin, and the risk related to mixing with non-eligible inputs in the supply chain (according to Clause 4.10 of this standard); and
- c) the mitigation of these risks (according to Clause 4.11 of this standard), if applicable.

Do your products contain species listed in Appendices 1, 2, or 3 of CITES? You will also need to include their certificate.



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Review and analyse the information collected in the steps above and conduct a risk assessment to determine whether there is a risk of sourcing material from non-eligible sources, covering the **risk of origin** and the **risk of mixing**.

The risk assessment will result in the classification of material into ‘negligible’ or ‘non-negligible’ risk category, and the organization shall only use input material if there’s a conclusion of a negligible risk.

FSC RISK ASSESSMENTS

RA

FSC Risk Assessments are based on FSC-PRO-60-006b *Risk Assessment Framework*. This framework contains the requirements for assessing the risk of sourcing from supply areas.

FSC-PRO-60-006b *Risk Assessment Framework* outlines how standard developers are to develop and revise risk assessments for a geographical area. This framework covers 64 indicators to assess risks based on compliance with applicable legislation and even going beyond to conform with global sustainability best practices.

These indicators cover the assessment of key topics such as existence of child labor, identification and protection of HCVs, degradation, conversion, respect of human rights and more.

This framework includes complementary annexes containing a template for assessment, list of recommended sources of information, and guidance material.



[Learn more about FSC Risk Assessments](#)

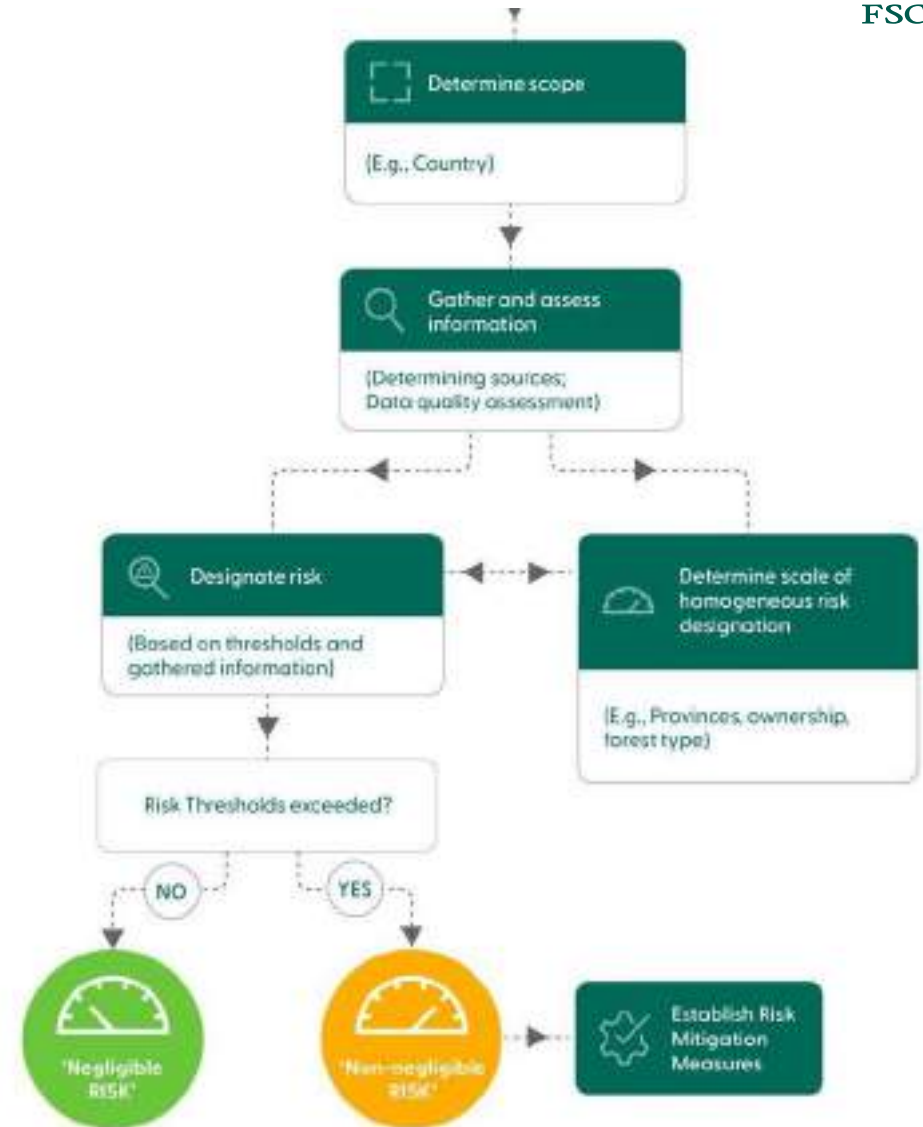


HOW TO USE

When there is an FSC Risk Assessment use the results and identify the designation of risk per indicator considering scale and type of risk. Where there is a non-negligible risk designation, check the proposed mitigation measures within the risk assessment.

Coming soon: Risk Hub for FSC users for easy access for available regions and countries to see and understand the assessment of risk within that area and proposed mitigation measures.

Where an FSC Risk Assessment doesn't exist organizations can develop an extended company risk assessment using existing template provided by FSC available as established in FSC-PRO-60-006b.



The risk assessment can result in either **no risk**, **negligible risk** or **non-negligible risk**. In instances where a risk assessment results in a non-negligible risk, the forest manager is required to implement risk mitigation measures to lower the risk level into negligible risk before selling the products.

Negligible risk: A conclusion, following a risk assessment, that either there is no cause for concern that material from a specific geographic area originates from unacceptable sources, or that material is mixed with non-eligible inputs or material with a different origin in such a way that would not allow the level of risk related to origin to be confirmed as negligible.

Non-negligible risk: A conclusion, following a risk assessment, that there is cause for concern that material from unacceptable sources may have been sourced or entered the supply chain from a specific geographic area. The nature and extent of this risk is specified to define efficient mitigation measures.

RISK OF ORIGIN

RA

FSC 100%: conduct the risk assessment using the 'simplified risk assessment template' provided by FSC.

FSC Mix and FSC Controlled Wood: use the applicable FSC Risk Assessment.

Not available? Conduct your own company risk assessment, according to the full set of indicators under FSC-PRO-60-006b Risk Assessment Framework.

1. Company risk assessment: ensure you have the approval from your certification body before you can use the risk designations.

For additional guidance on how to develop a risk assessment click here:





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The aim is to avoid mixing with materials of unknown origin or produced in areas where deforestation or forest degradation has occurred or is occurring. Therefore, the organization needs to assess the complexity of its supply chains and the stage of processing. The organization shall assess the risk of non-eligible inputs entering FSC product groups included in the FSC Regulatory Module. The risk of mixing includes the stages of transport, processing, and storage.

The risk assessment must take into account the conclusions of the meetings of the Commission expert groups as published in the European Commission's expert group register.



Did the risk assessment identify any non-negligible risk (at origin or mixing level)? Then, you must establish and implement effective mitigation measures.



Need examples and guidance on mitigation measures? Check FSC-PRO-60-006b Risk Assessment Framework.



Implement adequate and proportionate policies, controls and procedures to mitigate and manage effectively the risks, including: model risk management practices, reporting, record-keeping, internal control and compliance management.

How to be sure they are being implemented correctly: Implement an annual independent audit.

You may deem the risk negligible (no further mitigation required) if you are sourcing:

1. FSC 100% (sourced through FSC-certified supply chain); or
2. Material with a Regulatory claim and through a 'fully verified supply chain'.

But this **does not exempt you** from conducting further risk mitigation measures in the case of new information received or made aware, including substantiated concerns, that may affect the conformity of certification requirements.

DDS – ELEMENTS OF A DUE DILIGENCE STATEMENT

DDS



Information to be included in the due diligence statement in accordance with Article 4(2) as provided in Annex II of EUDR:

1

Operator's name, address and, in the event of relevant commodities and relevant products entering or leaving the market, the Economic Operators Registration and Identification (EORI) number in accordance with Article 9 of Regulation (EU) No 952/2013.

2

Harmonized System code, free-text description, including the trade name as well as, where applicable, the full scientific name, and quantity of the relevant product that the operator intends to place on the market or export. For relevant products entering or leaving the market, the quantity is to be expressed in kilograms of net mass and, where applicable, in the supplementary unit set out in Annex I to Regulation (EEC) No 2658/87 against the indicated Harmonized System code or, in all other cases, expressed in net mass specifying a percentage estimate or deviation or, where applicable, volume or number of items. A supplementary unit is applicable where it is defined consistently for all possible subheadings under the Harmonized System code referred to in the due diligence statement.

3

Country of production and the geolocation of all plots of land where the relevant commodities were produced. Where the relevant product contains or has been made using commodities produced in different plots of land, the geolocation of all plots of land shall be included in accordance with Article 9(1), point (d).

4

For operators referring to an existing due diligence statement pursuant to Article 4(8) and (9), the reference number of such due diligence statement.

5

The text: 'By submitting this due diligence statement the operator confirms that due diligence in accordance with Regulation (EU) 2023/1115 was carried out and that no or only a negligible risk was found that the relevant products do not comply with Article 3, point (a) or (b), of that Regulation.'

6

Signature in the following format: | 'Signed for and on behalf of: | Date: | Name and function: Signature:'

DDS – PUBLICLY AVAILABLE INFORMATION

DDS



Non-SMEs must also provide a written summary of its DDS to the certification body. As a minimum, it shall include the following information:

a description of the supply area(s), including the country and respective risk designation(s);



a description of the product groups, including the product types, trade names (if applicable), common and full scientific name of each species;



the annual quantity sold per product group;



reference to the applicable FSC risk assessment;



the organization's own risk assessment (excluding confidential information);



the conclusions of the risk assessment and risk mitigation measures, including sources of evidence;



where applicable, a description of the process of consultation of indigenous peoples, local communities and other customary tenure rights holders or of the civil society organisations that are present in the area of production of the relevant products.



the procedure for filing complaints; and



contact information of the person or position responsible for addressing complaints.



technology to support

A FEW OTHER THINGS TO NOTE:



Language: The summary of the DDS is not required to be in one of the official languages of FSC (English, Spanish or French).



The description of the consultation process may be obtained through engagement with suppliers/sub-suppliers who were responsible for this process. The organization is responsible for obtaining the information and for checking its plausibility.



Public: The organization shall make the written summary publicly available, as widely as possible, including via the internet.



Review: The organization shall review and revise the written summary of its DDS on an annual basis.

The organization need to prepare following information with regards to FSC product groups

1. name, registered trade name or registered trademark of the supplier;
2. Postal address, email address and (if available) a web address of the supplier

For record keeping, you need to maintain up-to-date records of the products with FSC Regulatory Module that should include:

- a) **inputs:** (if applicable) due diligence statement reference number(s) and the Regulatory claim
- b) **outputs:** due diligence statement reference number(s) and the Regulatory claim

Make sure to verify your suppliers' sales and delivery documentation to confirm:

- a) the Regulatory claim is specified
- b) the supplied material description is in conformity with the supplied documentation, including the trade name and type of product;
- c) the quantity is expressed in:
 - i. kilograms of net mass and, where applicable, in the supplementary unit set out in indicated in Harmonized System code, or
 - ii. net mass, or
 - iii. where applicable, volume or number of items

What is a supplementary unit?

This is another unit of measure and can be used. It is used consistently for all product groups that have been designated with the same Harmonized System Code subheading/code

The standard units of quantity expressed are:

WEIGHT – kilogrammes (kg) – Carat (carat)

LENGTH – metres (m)

AREA – square metres (m²)

VOLUME – cubic metres (m³) – litres (l)

ELECTRICAL POWER – 1,000 kilowatt hours (1,000 kWh)

NUMBER (units) – pieces/items (u) – pairs (2u) – thousands of pieces/items (1,000u) – packs (u(jeu/pack))

NOTE 1: A supplementary unit is applicable where it is defined consistently for all possible subheadings under the Harmonized System code referred to in the due diligence statement



What if you are receiving material from a supplier who is outside the EU or not applying the FSC Regulatory Module?

– Your organization is responsible for obtaining all the required information regardless of the location of your supplier

NOTE 2: FSC claims may be followed by a ‘Regulatory’ claim. This does not apply to ‘FSC Recycled’ claims.

MATERIAL HANDLING

Where there is the risk of mixing non-eligible material with the materials supplied with the FSC Regulatory claim, separation of material should be implemented.



IN YOUR SALES DOCUMENTS, PLEASE INCLUDE THE FOLLOWING TOO:

- a) due diligence statement(s), reference number(s)
- b) a clear indication of the FSC claim followed by the Regulatory claim, for each product item or the total products.

DO YOU KNOW ABOUT REG?

As an alternative to the full description of the Regulatory claim, the organization may use the abbreviation 'REG' in sales documentation in case of space constraints, provided that the abbreviation is clearly defined in the organization's documented procedures.

You can refer to a due diligence statement issued by a supplier/sub-supplier, provided that there is evidence of due diligence conducted in accordance with requirements of the FSC Regulatory Module.

You must maintain the information on all customers to whom the material with regulatory claim is supplied, including:

- name,
- registered trade name or registered trademark;
- postal address,
- email address and (if available) a web address

Chain of Custody: Regulatory claim

WHAT IS THE REGULATORY CLAIM?

A claim made on sales and delivery documents used in combination with the FSC claim (excluding FSC Recycled), for products based on inputs exclusively of material which has been assessed to be in conformity with the requirements of FSC Regulatory Module.

Products exclusively made of input materials from a fully verified supply chain can add a plus symbol to the Regulatory claim, i.e., Regulatory+ or REG+



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Regulatory output claim	Eligible inputs	FSC control system		
		Transfer	Percentage	Credit
Regulatory+ or REG+	Regulatory+	✓	N/A	N/A
Regulatory or REG	Regulatory+, Regulatory, material in conformity with the FSC Regulatory Module	✓	✓	✓

Fully verified supply chain

Supply chain where every certificate holder has applied the FSC Regulatory Module and establishes a product group for the purpose of controlling the Regulatory+ output claim.

This claim can be passed on along the supply chain by certificate holders according to the requirements of this standard.



USE OF THE FSC TRADEMARKS

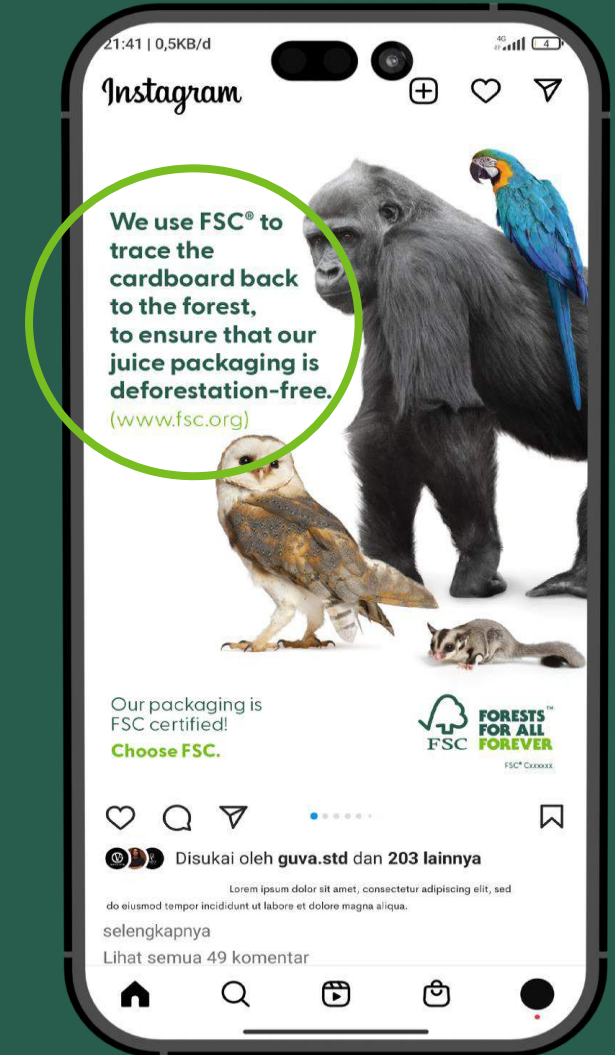
Organizations may promote FSC-certified products in the scope of the FSC Regulatory Module with the FSC trademarks.

Dedicated webpage to provide an overview to these claims at [fsc.org/reg](https://www.fsc.org/reg).

Example promotions:

‘We conduct the EUDR-required due diligence for our [products/projects], with support from FSC®'s robust system ([fsc.org/reg](https://www.fsc.org/reg)).’

‘We use FSC® to trace the [forest-based material] back to the forest, to ensure that our [products/projects] are deforestation-free ([fsc.org/reg](https://www.fsc.org/reg)).’



FSC-STD-40-006 V 2-0 – STANDARD FOR PROJECT CERTIFICATION



In addition to the requirements established in [FSC-STD-40-006 FSC Standard for Project Certification](#) key areas of focus include the appointment of a management representative to act as a compliance officer, the maintenance of records, and a procedure for the collection of new information that it obtains or is made aware, including substantiated concerns.

When applying the FSC Regulatory Module, other substantial changes include a complete restriction on the use of non-certified and non-controlled components of the project. There are specific details that need to be added to the Product Groups and adherence to the compliance with timber legality legislation.

Project's purchasing and sales documents needs to be reviewed to ensure the 'Regulatory' claim is listed, a reference number of their supplier's due diligence statement is visible on purchasing documents, and the organization's due diligence statement number is listed on sales documents.

You cannot use non-certified and non-controlled components for projects that are under the FSC Regulatory Module.

Controlled Wood additional requirements



Controlled Wood already based on EUDR and risk-based system



No additional requirements beyond those outlined in the module for chain of custody



TRACEABILITY



FSC is working on a digital traceability solution through blockchain to support delivery of due diligence statements and other information. Stay informed at www.fsc.org/fsctrace



HOW CAN I GET CERTIFIED TO THE FSC REGULATORY MODULE?

Certificate holders will need to request for a scope extension from their certification bodies to include the Regulatory Module and at minimum a desk-based audit will need to be done either during the next surveillance audit or as agreed with the certification body from 1 July 2024 (so not only from 1 January 2025).

Learn more at fsc.org/STARTEUDR



Thank you

