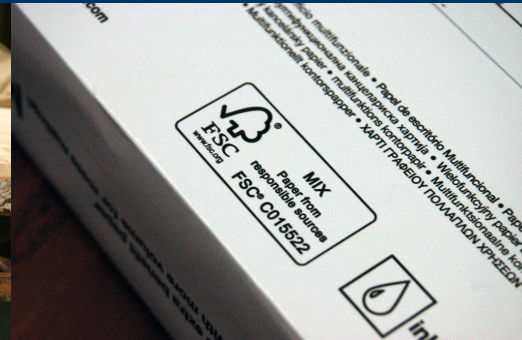


## FSC® STANDARD

### Requirements for sourcing Controlled Wood

FSC-STD-40-005 V 3-0 EN



|                                 |   |
|---------------------------------|---|
| <b>Title:</b>                   | Requirements for sourcing Controlled Wood   |
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**DRAFT 1-0**

The Forest Stewardship Council® (FSC) is an independent, not for profit, non-government organization established to support environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

FSC's vision is that the world's forests meet the social, ecological, and economic rights and needs of the present generation without compromising those of future generations.

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## Annex 1 Summary of the Controlled Wood evaluation process

## A Objective

This standard outlines the requirements for FSC Chain of Custody certified Organizations to avoid material from 'unacceptable' sources in the production of FSC Mix products. It establishes requirements for evaluation and mitigation of risk associated with non-FSC certified wood sources.

The five 'unacceptable sources' or FSC Controlled Wood categories are:

- 1) Illegally harvested wood;
- 2) Wood harvested in violation of traditional and human rights;
- 3) Wood from forests in which high conservation values are threatened by management activities;
- 4) Wood from forests being converted to plantations and non-forest use; and
- 5) Wood from forests in which genetically modified trees are planted.

National Risk Assessments, developed by approved National entities and endorsed by FSC, are used to evaluate risk for each of the FSC Controlled Wood categories for a defined geographic area. National Risk Assessments result in either "low risk" or "specified risk" designations. When "specified risk" is determined a set of prescribed 'Control measures' will be provided that FSC-certified Organizations shall implement to mitigate risk. A table of the Indicators for each of the Controlled Wood categories, means of verification, and thresholds for conformance can be found in *FSC-PRO-60-002b FSC National Risk Assessment Framework*.

## B Scope

This standard shall be used by FSC Chain of Custody Organizations applying *FSC-STD-40-004 FSC standard for chain of custody certification* that wish to include Controlled Wood in the scope of the certificate using a company system to verify their non-FSC certified wood sources for the purpose of producing FSC Mix products. It is *not* intended for sourcing of FSC Controlled Wood i.e. material that has been previously certified as FSC Controlled Wood and supplied by FSC Chain of Custody certified suppliers.

This standard specifies requirements for an Organization's evaluation and sourcing of Controlled Wood based on risk assessment and prescribed means for risk mitigation specified in FSC approved National Risk Assessments (NRAs). National Risk Assessments are listed in *FSC-PRO-60-002a List of approved National and Regional Controlled Wood Risk Assessments and Guidance*.

All aspects of this standard are considered to be normative, including the scope, standard effective date, references, terms and definitions, tables and annexes, unless otherwise stated.

Requirements for areas not covered by the National Risk Assessment are specified in section 10.

Organizations wishing to source Controlled Wood from Management Units (MUs) they (or an affiliated organization) own or manage shall seek independent certification of their forests according to *FSC-STD-30-010* and are not eligible to use *FSC-STD-40-005* for this purpose.

## C Effective and validity dates

|                    |   |
|--------------------|---|
| Approval date      | Target: June 2014                                       |
| Publication date   | Target: 01 October 2014                                 |
| Effective date     | Target: 01 January 2015                                 |
| Period of validity | until 31 December 2019 (or until replaced or withdrawn) |

## D References

The following referenced documents are relevant for the application of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

*FSC-POL-01-004 Policy for the Association of Organizations with FSC*  
*FSC-PRO-01-001 Development and revision of FSC normative documents*  
*FSC-PRO-60-002 Development and approval of Controlled Wood National Risk Assessments*  
*FSC-PRO-60-002a List of approved National and Regional Controlled Wood Risk Assessments and Guidance*  
*FSC-PRO-60-002b FSC National Risk Assessment Framework*  
*FSC-STD-01-002 FSC Glossary of terms*  
*FSC-STD-01-005 Dispute Resolution System*  
*FSC-STD-20-011 Accreditation standard for chain of custody evaluations*  
*FSC-STD-30-010 Forest management requirements for Controlled Wood certification*  
*FSC-STD-40-004 FSC standard for chain of custody certification*

## E Terms and definitions

For the purpose of this standard, the terms and definitions provided in *FSC-STD-01-002 FSC Glossary of Terms*, and the following apply:

**Complaint:** in the context of this standard, complaint means expression of dissatisfaction by any person or organization in relation to the Organization's conformance with this standard.

**Control Measures (CM):** actions that the Organization shall take in order to mitigate the risk of sourcing material from sources unacceptable as defined by FSC's five CW categories.

**Controlled Wood:** material that has been assessed to be in conformance with the requirements of this standard or requirements of standard *FSC-STD-30-010 Forest management requirements for Controlled Wood certification* to avoid the unacceptable sources defined by Controlled Wood categories: 1) illegally harvested wood; 2) wood harvested in violation of traditional and human rights; 3) wood from forests in which high conservation values are threatened by management activities; 4) wood from forests being converted to plantations and non-forest use; and 5) wood from forests in which genetically modified trees are planted.

**Due diligence:** in the context of this standard, due diligence is considered to define the actions taken by an Organizations to minimize risk to negligible/ low risk levels of sourcing wood and wood-based material from unacceptable sources.

**Due diligence system:** a set of steps or actions taken in order to ensure that due diligence is exercised, based on available written guidelines and procedures approved by the Organization, that describe the due diligence process in detail. A due diligence system usually contains the following 3 elements: obtaining information, risk assessment, risk mitigation.

**Forest Conversion:** rapid or gradual removal of natural forest, semi-natural forest or other wooded ecosystems such as woodlands and savannahs to meet other land needs, such as plantations (e.g. pulp wood, oil palm or coffee), agriculture, pasture, urban settlements, industry or mining. This process is usually irreversible.

**FSC Controlled Wood:** material with an FSC claim supplied by a supplier which has been assessed by an FSC accredited certification body for conformity with Controlled Wood requirements according to the standard *FSC-STD-40-005* or *FSC-STD-30-010*.

**Low Risk:** a conclusion, following a risk assessment, that there is negligible risk that material from unacceptable sources can be sourced from a specific geographic area.

**Management Unit (MU):** a spatial area with clearly defined boundaries managed to a set of explicit long term forest management objectives which are expressed in a management plan. This area or areas include(s):

- all facilities and area(s) within or adjacent to this spatial area or areas under legal title or management control of, or operated by or on behalf of the Organization, for the purpose of contributing to the management objectives; and
- all facilities and area(s) outside, and not adjacent to this spatial area or areas and operated by or on behalf of The Organization, solely for the purpose of contributing to the management objectives. (Source: FSC 2011).

**Material under control:** material (e.g. wood, wood products) not covered by a formal FSC Claim (FSC certified or FSC Controlled Wood Certified), which is being evaluated by the Organization to the origin of acceptable sources.

**National Risk Assessment:** an designation of the risk of sourcing from unacceptable sources in a given country/region, developed according to *FSC-PRO-60-002 The Development and Approval of Controlled Wood National Risk Assessments*.

**The Organization:** the person or entity holding or applying for certification and therefore responsible for demonstrating compliance with the requirements upon which FSC certification is based (Source: FSC 2011).

**Significant conversion:** conversion is considered significant in terms of:

- Conversion of High Conservation Value Forests
- Conversion of more than 10% of the forest areas under the organization's responsibility in the past 5 years
- Conversion of more than 10,000 ha of forests under the Organization's responsibility in the past 5 years

**Specified risk:** a conclusion, following a risk assessment, that there is risk that forest products from unacceptable sources may be sourced or enter the supply chain. The nature and extent of this risk is specified for the purpose of defining efficient control measures.



**Specified risk area:** area where National Risk Assessment has identified and specified risks of sourcing material from unacceptable sources.

**Supplier:** the entity that supplies material to the certified Organization.

**Supply area:** the total geographical area from which materials are sourced. The supply area does not need to be defined as a single contiguous area; it may comprise multiple separate areas that span multiple political jurisdictions including countries or multiple forest types.

**Unacceptable sources:** sources of material that do not meet the requirements of FSC standards (*FSC-STD-01-001*, and/or *FSC-STD-40-005*, and/or *FSC-STD-30-010*) and Controlled Wood categories: 1) illegally harvested wood; 2) wood harvested in violation of traditional and human rights; 3) wood from forests in which high conservation values are threatened by management activities; 4) wood from forests being converted to plantations and non-forest use; and 5) wood from forests in which genetically modified trees are planted.

**Unassessed risk area:** area or areas not covered by National Risk Assessment(s) or formally delineated as 'unspecified' risk in existing approved NRAs.

#### **Verbal forms for the expression of provisions**

[Adapted from *ISO/IEC Directives Part 2: Rules for the structure and drafting of International Standards*]

**“shall”:** indicates requirements strictly to be followed in order to conform to the standard.

**“should”:** indicates that among several possibilities one is recommended as particularly suitable, without mentioning or excluding others, or that a certain course of action is preferred but not necessarily required. A certification body can meet these requirements in an equivalent way provided this can be demonstrated and justified.

**“may”:** indicates a course of action permissible within the limits of the document.

**“can”:** is used for statements of possibility and capability, whether material, physical or causal.

## Part I: General Requirements

### 1 Documentation

- 1.1 The Organization shall have written procedures covering all applicable requirements of this standard.
- 1.2 The Organization shall ensure that records demonstrating conformance with this standard are maintained and available to auditors.
- 1.3 All relevant records shall be retained for a minimum of five (5) years.

### 2 Public summaries and reporting

- 2.1 The Organization shall make available to their certification body information related to its due diligence system to be included in a publicly available report on the certification process. This shall include:
  - a) The supply area(s) under the due diligence system;
  - b) Reference to the applicable National Risk Assessment;
  - c) The procedure for filing complaints and contact information for submitting comments/complaints.

#### Stakeholder consultation note:

The purpose of this section is to enhance the transparency of Controlled Wood. Details of contents still need to be discussed among the Technical Committee members, including limitations of certified Organizations to provide required information (e.g. due to confidentiality issues) . It is proposed that a minimum level of detail will be required for all Organizations (e.g. country level information to indicate the supply area) and to require justification why certain information cannot be made publicly available.

- 2.2 For material under control sourced from areas designated as specified risk, in addition to 2.1, the information shall include:
  - a) Identification of the risk(s) addressed by the Organization to which Control Measures have been applied;
  - b) For Control Measures that include stakeholder consultation, a summary of comments provided by stakeholders including how the comments were addressed;
  - c) A summary of the findings of field verification in situations where field verification is required, including steps taken by the Organization to address identified non conformities.

#### Stakeholder consultation note:

Information required in this section of the standard will be published as a part of the certification summary included in the certification report of the FSC accredited certification body (CB). A set of requirements for the CBs will be included in the standard '*FSC-STD-20-011 Accreditation standard for chain of custody evaluations*'.



**Please note that this is not addressed in the currently ongoing consultation process on the standard *FSC-STD-20-011*. The Controlled Wood requirements of the standard *FSC-STD-20-011* will be revised once this standard (*FSC-STD-40-005*) is finalized. It is proposed that *FSC-STD-20-011* will additionally require CBs to publish the list of Corrective Action Requests issued to the certificate holder as part of the public summary information.**

### **3 Complaints mechanism**

- 3.1 The Organization shall have and implement a documented mechanism to handle complaints related to supplies of material under control.
- 3.2 This mechanism shall include, at a minimum, unless otherwise stated in the applicable National Risk Assessment:
- a) A means to inform stakeholders of the mechanism for dealing with complaints;
  - b) Procedures for forwarding complaints related to risk assessment in relevant NRA(s) to the responsible body (determined according to the *FSC-PRO-60-002*);
  - c) Acknowledgment of complaints and preliminary assessment of the evidence provided in the complaint to the complainant, the responsible certification body and the relevant FSC National Office within two (2) weeks of receipt of the complaint;
  - d) Verification process (e.g. field verification, desk verification) for cases in which evidence is considered substantial by the Organization, within two (2) months after its receipt;
  - e) Procedures for employing a precautionary approach towards continued sourcing of the relevant material under control while a complaint is active;
  - f) Procedures to exclude supply and supplier if a complaint is considered as substantial;
  - g) Procedures to ensure that relevant material under control (as per d) above) will only be accepted as Controlled Wood once it can be demonstrated as being in conformance with FSC Controlled Wood requirements;
  - h) Recording and filing of all complaints received and actions taken;
  - i) Procedures for informing the complainant, the responsible certification body and the relevant FSC National Office of the results of the complaint and any actions taken towards its resolution.
- 3.3 If the evaluation of a complaint does not support a low risk determination, the Management Units (MUs) in question shall be re-assessed, according to Option C proposed in Section 10 for the relevant Controlled Wood category or the MUs shall be excluded from controlled supplies.

#### **Stakeholder consultation note:**

**To secure transparency of the Organization's procedure to deal with complaints, a discussion is taking place within the Technical Committee as to whether the standard should require public registration of formal complaints received by the Organization (e.g. a registry on the FSC database) and a vetting procedure**

**for deciding on what constitutes a formal complaint. Stakeholders are invited to provide feedback on the above (including possible entities responsible for public registry of complaints).**

## **Part II Due Diligence System (DDS)**

### **4 Establishment of a DDS**

- 4.1 The Organization shall establish and implement a documented Due Diligence System to evaluate the supplies to be used in FSC product groups according to the requirements outlined in this standard.

NOTE: The Organization can choose to develop its own DDS or outsource DDS development to another entity, including FSC accredited certification bodies.

- 4.2 The DDS shall consist of the following elements:

4.2.1 Obtaining information according to Section 5 of this standard;

4.2.2 Risk assessment and mitigation, including:

- a) Risk assessment and mitigation of sourcing unacceptable material based on the relevant National Risk Assessment(s) where they exist, according to Sections 7 and 8 of this standard;
- b) Risk assessment and mitigation of sourcing unacceptable material from unassessed risk areas, according to the Section 10 of this standard;
- c) Risk assessment of mixing material under control with other material throughout supply chain(s) according to Section 8 of this standard.

- 4.3 The Organization shall only classify material under control as Controlled Wood that has been confirmed through the DDS as being sourced in conformity with the requirements of this standard.

- 4.4 The Organization shall conduct internal verification of its DDS at least annually to ensure it meets all the relevant requirements of this standard.

NOTE: The DDS will also be audited by the responsible certification body at least annually.

- 4.5 As part of the internal evaluation, the Organization shall assess the effectiveness of any Control Measure taken at a frequency sufficient to mitigate risk (for Control Measures requirements refer to Section 9).

- 4.6 All non-conformities detected and corrective actions issued by the Organization in their internal verification taken shall be documented.

- 4.7 The Organization shall ensure that all non-conformities are addressed and corrected in a timely manner.

## **5 Identification of supplies**

- 5.1 The Organization shall have and maintain up-to-date information of material under control included within the scope of its DDS, including:
- a) Name and address of supplier(s);
  - b) Type of product;
  - c) Common and scientific name of tree species;
  - d) Volume(s) of material under control purchased and sold;
  - e) Country(s) of harvest;
  - f) National Risk Assessment(s) for country(s) of harvest.
- 5.2 Species listed in Annex 1, 2 or 3 of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) that will be exported shall be accompanied by the applicable licenses and/or export permits.
- 5.3 The Organization shall require their suppliers to notify them of any changes to the supplied material in term of species, origin or supply chain.

## **6 Identification and classification of supply area(s)**

- 6.1 The Organization shall classify the material under control as coming from one of the following categories of supply areas:
- a) From areas with 'low risk' of sourcing from unacceptable sources as defined in the relevant National Risk Assessment(s) for relevant CW categories; and/or
  - b) From areas with 'specified risk' of sourcing from unacceptable sources as defined in the relevant National Risk Assessment(s) for relevant CW categories; and/or
  - c) From unassessed risk areas (areas not covered by the relevant National Risk Assessment(s)); and/or
  - d) From certified sources according to the FSC-STD-01-001 or FSC-STD-30-010 and/or FSC-STD-40-004 after chain of custody for those material/products has been broken.
- 6.2 The Organization shall have access to information that allows it to confirm and document the category of supply area(s).

NOTE: A declaration from the supplier may only be used as a part of the body of documentation for demonstrating the supply area. A supplier declaration alone, even if covered by a contractual agreement, is not considered sufficient proof of the supply area of the material under control.

## **7 Classification of supplies**

- 7.1 Material under control from supply areas identified as 'low risk' for all five Controlled Wood categories can be classified by the Organization as Controlled Wood.
- 7.2 Material under control from supply areas identified as 'specified risk' for any of the five Controlled Wood categories shall be assessed against the requirements outlined in section 9 of this standard before it can be classified by the Organization as Controlled Wood.
- 7.3 Material under control from unassessed risk areas shall be assessed against the requirements outlined in section 10 of this standard before it can be classified by the Organization as Controlled Wood.
- 7.4 Material under control from MU(s) certified according to the FSC Principles and Criteria (*FSC-STD-01-001*) or *FSC-STD-30-010* supplied without a valid formal FSC claim (as the supplier does not hold a valid FSC COC certificate) may be classified as Controlled Wood if objective evidence is available that the certified material has not been mixed with other material by the non-FSC certified supplier.

NOTE: classification of material with a valid formal FSC claim is covered in the standard *FSC-STD-40-004*.

## **8 Assessment and risk mitigation of mixing material**

- 8.1 The Organization shall assess the risk of mixing material under control with other non-FSC certified material in the supply chain during transport, processing or storage.
- 8.2 The Organization shall document the risk assessment process and provide justification for the risk assessment results for each product or supply chain.
- 8.3 The risk assessment shall be revised at least annually and whenever changes occur to the supply chain that could alter the risk assessment of that supply chain.
- 8.4 The Organization shall develop and implement efficient and justified measures for mitigating the risk of mixing material under control with other non-FSC certified material in the supply chain during transport, processing or storage.

## **9 Material sourced from areas designated as specified risk**

- 9.1 The Organization shall implement the Control Measures as prescribed in the applicable National Risk Assessment (NRA) for each supply chain from areas of specified risk for the relevant Controlled Wood indicators before material under control can be classified as Controlled Wood.

### **Stakeholder consultation note:**

**There is ongoing discussion within the Technical Committee whether to allow Organizations to develop alternative Control measures to those specified in the relevant NRAs and whether additional safeguards would need to be put in place to ensure that such control measures are equally or more effective than those prescribed in NRAs.  
Please provide your views and any proposed safeguards.**

- 9.2 Material under control can be classified by the Organization as Controlled Wood after the implementation of Control Measures and documented verification that they have been effective in mitigating the specified risk based on assessment according to Clause 4.5.
- 9.3 Material under control cannot be classified as Controlled Wood if the Control Measures cannot be verified as being effective to mitigate the specified risk in supply chains under consideration.
- 9.4 The Organization shall monitor the conformity of their suppliers with applicable requirements of this standard and of the relevant National Risk Assessment(s) throughout its supply chain(s) related to the material under control originating from specified risk areas by taking the following steps:
- a) Informing the suppliers about applicable requirements of this standard, the relevant National Risk Assessment(s), and request its suppliers to provide that information to their sub-suppliers and through the supply chain;
  - b) Ensuring that their certification body is granted access to evidence of conformance with the standard and the relevant National Risk Assessment(s) and access to conduct supply chain and forest level audits where applicable;
  - c) Acquiring consent from suppliers to allow the Organization or external auditors to conduct audits for the purpose of internal verifying conformity with applicable requirements of this standard and the relevant National Risk Assessment(s); and
  - d) Requesting suppliers to appoint a person(s) responsible for conformity with the applicable requirements of this standard and the relevant National Risk Assessment(s).

## 10 Material sourced from areas not covered by National Risk Assessments

### Stakeholder consultation note:

**Rather than to provide in this consultation phase one set of requirements for sourcing material under control in areas without approved National Risk Assessments, the Controlled Wood Technical Committee proposes that stakeholders consider a suite of options and provide comments on which of those options, or alternate options, are preferred to support the following discussion.**

### Option A: FSC-STD-30-010 certification

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Sourcing Controlled Wood shall only be possible if the MU is certified according to *FSC-STD-30-010*. In this case, the Organization does NOT need to comply with *FSC-STD-40-005* (this standard).

NOTE: *FSC-STD-30-010* will be aligned with the FSC Principles and Criteria (P&C) (V 5-0) and will adequately refer to relevant P&C requirements.



## Option B: Second party audit of sourcing MU(s)

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Sourcing material from unassessed risk areas is allowed provided the Management Units meet the requirements prescribed in *FSC-STD-30-010* and an FSC-accredited certification body performs the evaluation<sup>1</sup> at the discretion of the Organization. Compared to Option A the evaluated MU does not receive a certificate against FSC-STD-30-010.

## Option C: Interim Control Measures

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In countries (or regions) where no approved National Risk Assessment exists by 1<sup>st</sup> January 2015, all areas shall be considered as unassessed risk for all Controlled Wood categories. Unspecified risk areas in existing NRAs approved before the effective date of this standard shall be considered as unassessed risk as well. Organizations sourcing wood from these areas must implement the interim Control Measures to ensure that the sources are controlled for all Controlled Wood categories (see details below).

To apply the interim Control Measures, the Organization shall consult *FSC-PRO-60-002b The FSC NRA Framework*, as Option C is based on the assumption that for unassessed risk areas the Organization shall follow a methodology similar to the one prescribed in the National Risk Assessment Framework. Interim Control Measures need to be developed applying a step-wise approach, according to the section 'Decision tree' (below).

**Please note** that there is ongoing discussion within the Technical Committee whether to allow Organizations to develop alternative Control Measures to interim Control Measures specified in this section and whether additional safeguards would need to be put in place to ensure that such Control Measures are equally or more effective than those prescribed in the NRA.

**Please provide your views and any proposed safeguards**

In countries where an NRA is already under development, the Organization shall incorporate the elements developed to date into their assessments, if recorded in the FSC Global Forest Registry<sup>2</sup>.

Interim Control Measures shall be up-dated at least annually, following the methodology described for each Controlled Wood category.

Risk designation and related evidence generated by companies shall be provided to FSC at [policy.standards@fsc.org](mailto:policy.standards@fsc.org) for populating the FSC Global Forest Registry (notwithstanding any corporate confidentiality concerns).

This option will be available to organizations until **31st of December 20xx**.

**Please note** that this option will only be available to organizations for a limited amount of time. Within the CWTC a tentative timeframe of 2 years was discussed, however the final timeframe during which this option is available will be determined by FSC based on the expected date for having approved National Risk Assessments in place. Stakeholders are invited to provide their opinion on the suggested date for Option C availability. The Technical Committee requested FSC to develop an NRA action plan to ensure their development is adequately resourced.

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<sup>1</sup> The CB is required to conduct the evaluation in line with the standard *FSC-STD-20-012*.

<sup>2</sup> Publication of any data on Global Forest Registry requires its submission and following approval by FSC.



Currently, there are only 14 NRAs approved that will need to be adapted to the new requirements. The list of approved NRAs is included in the *FSC-PRO-60-002a List of approved National and Regional Controlled Wood Risk Assessments (current version)*.

For more information about the status of NRA development, see the [FSC website](#)

### Decision tree for identifying the applicable interim Control Measures

1. Is the location of the MU(s) where the wood is sourced from possible to identify?  
(Yes = perform risk assessment and mitigation for all categories of CW as specified below) (No = fail, material cannot be classified as Controlled Wood)

#### **CATEGORY 1 - Illegally harvested wood**

1. Is the material under control covered by a FLEGT license, or a 3<sup>rd</sup> party legality certificate issued by an FSC accredited certification body?  
(Yes = pass, material can be classified as Controlled Wood for category 1) (No = go to 2)
2. Is the country of harvest classified as low risk in the Global Forest Registry?  
(Yes = pass, material can be classified as Controlled Wood for category 1) (No = go to 3)
3. Has an Interim Legality Risk Assessment Framework<sup>3</sup> (ILRAF) been published for the country of harvest at the Global Forest Registry?  
(Yes = go to 4) (No = go to 5)
4. Does the evaluation according to the ILRAF confirm legal compliance?  
(Yes = pass, material can be classified as Controlled Wood for category 1) (No = fail, material cannot be classified as Controlled Wood)
5. Is it possible to verify legal compliance at the level of the Management Unit following the requirements defined under Control Measures and verifiers in Table 1 of *FSC-PRO-60-002b The NRA Framework*?  
(Yes = go to 6) (No = fail, material cannot be classified as Controlled Wood)
6. Implement field verification according to the list of applicable legislation at the MU level following the requirements defined under Control Measures and verifiers in Table 1 of *FSC-PRO-60-002b The NRA Framework*. Does the field verification confirm legal compliance?  
(Yes = pass, material can be considered as Controlled Wood for category 1) (No = fail, material cannot be classified as Controlled Wood)

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<sup>3</sup> Interim Legality Risk Assessment Framework (ILRAF) is performed based on requirements of FSC-PRO-60-002b FSC National Risk Assessment Framework for Category 1 of Controlled Wood (Illegally harvested wood). For more information visit [the FSC Global Forest Registry](#)

## **CATEGORY 2 - Wood harvested in violation of traditional and human rights**

1. Is there a UN Security Council ban on timber exports from the country concerned?  
(Yes = fail, material cannot be classified as Controlled Wood) (No = go to 2)
2. Is the country or area designated as a source of conflict timber?  
(Yes = fail, material cannot be classified as Controlled Wood) (No = go to 3)
3. Does the Organization have a system in place for excluding wood harvested in violation of traditional and human rights?  
(Yes = go to steps: 4, 5, 6, 7, 8) (No = fail, material cannot be classified as Controlled Wood)
4. Is there evidence of child labor or violation of ILO Fundamental Principles and Rights at work taking place in the area concerned?  
(Yes = go to 9) (No = go to steps: 5, 6, 7, 8)
5. Is there evidence of conflicts pertaining to traditional and customary rights including use rights, land tenure rights, cultural interests or traditional cultural identity in the area concerned?  
(Yes = go to 9) (No = go to 6, 7, 8)
6. Is there evidence of violation of ILO Convention 169 on Indigenous and Tribal Peoples taking place in the area concerned?  
(Yes = go to 9) (No = go to 7, 8)
7. Is there evidence of recognition and respect of the cultural and other specificities of Indigenous and Traditional Peoples and their rights to active participation in decision making related to development of the area concerned (e.g. consultation with IP, TP; the right to decide about priorities for development)?  
(Yes = go to 8) (No = go to 9)
8. Is there evidence that the principle of Free Prior and Informed Consent is upheld where harvesting takes place on Indigenous and Traditional Peoples land?  
(Yes = pass, material can be classified as Controlled Wood for category 2) (No = go to 9)
9. Is it possible to verify if the wood has been harvested in violation of traditional and human rights at the MU level via Control Measures given in Table 2.1 and/or 2.2 in *FSC-PRO-60-002b The NRA Framework*?  
(Yes = go to 10) (No = fail, material cannot be classified as Controlled Wood)
10. Implement verification at the MU level following Control Measures given in Table 2.1 and/or 2.2 in *FSC-PRO-60-002b The NRA Framework*. Does the verification confirm that the wood has not been harvested in violation of traditional and human rights?  
(Yes = pass, material can be classified as Controlled Wood for category 2) (No = fail, material cannot be classified as Controlled Wood)

## **CATEGORY 3 - Wood from forests in which high conservation values are threatened by management activities**

1. Does the Organization undertake pre-logging surveys of all harvesting sites located in the MU(s)?  
(Yes = go to 2) (No = go to 5)

2. Do the pre-logging surveys confirm the presence of the HCVs Categories 1-3 in the MU(s)?  
(Yes = go to 3) (No = go to 4)
3. Is the material under control coming from harvesting sites where HCVs Categories 1-3 are absent?  
(Yes = pass, material can be classified as Controlled Wood for category 3) (No = fail, material cannot be classified as Controlled Wood)
4. Do the pre-logging surveys confirm the presence of the HCVs Categories 4-6 in the MU(s)?  
(Yes = go to 8) (No = pass, material can be classified as Controlled Wood for category 3)
5. Does an FSC approved HCV Assessment Framework(s) exist for the area where material under control is sourced from?  
(Yes = go to 6) (No = go to 7)
6. Have the interim Control Measures been implemented by the Organization as prescribed in Box 1 (see next page), for the HCV categories identified based on the FSC approved HCV Assessment Framework?  
(Yes = go to 9) (No = fail, material cannot be classified as Controlled Wood)
7. Has a comprehensive HCV assessment been conducted by the Organization for the area where material under control is sourced from, involving:
  - a) Consultation with interested and affected stakeholders<sup>4</sup>;
  - b) Data evaluation - review all of the available data sources relevant to the areas under consideration. Data evaluation should result in the identification of data gaps, as well as in the identification of appropriate methods for filling the data gaps, including on the ground surveys;
  - c) Threat analysis - identification of all forest activities which constitute a threat to existing HCV(s); and
  - d) Expert<sup>5</sup> review - the appointment of chamber balanced experts to review proposed methods, results of assessment and review of proposed Control Measures identified as applicable for use?  
(Yes = go to 8) (No = fail, material cannot be classified as Controlled Wood)
8. Have the interim Control Measures been implemented by the Organization as prescribed in Box 1, for the HCV category(s) under consideration?  
(Yes = go to 9) (No = fail, material cannot be classified as Controlled Wood)

<sup>4</sup> Requirements for stakeholder consultation will be specified in *FSC-PRO-60-002b FSC National Risk Assessment Framework* and based on the final requirements of the recently consulted Advice note ([ADVICE-40-005-XX Stakeholder consultation](#)).

<sup>5</sup> The experts shall be approved by stakeholders based on stakeholder consultation. Requirements for stakeholder consultation will be specified in *FSC-PRO-60-002b FSC National Risk Assessment Framework* and based on the final requirements of the recently consulted Advice note (*ADVICE-40-005-XX Stakeholder consultation*).

9. Has the effectiveness of interim Control Measures in mitigating the risk been verified based on assessment according to Clause 4.5 and documented by the Organization for all HCV categories under consideration?  
(Yes = pass, material can be classified as Controlled Wood for category 3) (No = fail, material cannot be classified as Controlled Wood)

### **Box 1: Control Measures for the 6 HCV Categories**

#### **Control Measures for HCV1**

1. Demonstrate that inventory data are available for suppliers to ensure that the values of HCV1 are not threatened by forestry operations within the sourcing area. In sub areas identified by HCVs assessment as areas where HCVs are likely to occur, pre-logging surveys shall be undertaken for all harvested sites. Where pre-logging surveys identify the presence of the HCV, these sites shall be excluded from logging.
2. Demonstrate that wood is not sourced from areas where values of HCV1 are threatened by forest management activities.
3. Demonstrate that wood sourced from areas where values of HCV1 are threatened can be effectively excluded by the supplier.
4. Demonstrate that the tree species being sourced (e.g. exotic plantation species) are not occurring in areas containing values of HCV1.
5. Demonstrate that there is effective legal protection of all values of HCV1 either within or outside of the protected area network<sup>6</sup>.

#### **Control Measures for HCV2**

1. Demonstrate that stakeholders have agreed on an appropriate protected area network to maintain the values of HCV2 and these areas are being effectively protected.
2. If stakeholder negotiations are in progress in the country or region to protect these values and logging is still occurring, demonstrate that forest management activities are not occurring in those areas where values of HCV2 are threatened by forest management activities.
3. Demonstrate that wood sourced from areas where values of HCV2 are threatened can be effectively excluded by the supplier of material under control.
4. Demonstrate that the tree species being sourced (e.g. exotic plantation species) are not occurring in areas containing values of HCV2.
5. Demonstrate that there is effective legal protection of all values of HCV2 within the protected area network.

<sup>6</sup> Assessment of effectiveness of legal protection may be e.g. based on the Convention on Biological Diversity (CBD) and confirmed if the country where controlled material is sourced from is a CBD signatory and it can be demonstrated that Aichi Biodiversity targets and National Biodiversity and Action Plans are met (Implementation of Strategic Plan for Biodiversity 2011 – 2020, including Aichi Biodiversity Targets: <http://www.cbd.int/sp/implementation/>; National Biodiversity Strategies and Action Plans (NBSAPs): <http://www.cbd.int/nbsap/>; Assessment of NBSAPs: [http://www.ias.unu.edu/resource\\_center/UNU-IAS\\_Biodiversity\\_Planning\\_NBSAPs\\_Assessment\\_final\\_web\\_Oct\\_2010.pdf](http://www.ias.unu.edu/resource_center/UNU-IAS_Biodiversity_Planning_NBSAPs_Assessment_final_web_Oct_2010.pdf).)

6. Demonstrate that where consultation with experts has been used these experts<sup>4</sup> have been agreed by stakeholders.

#### **Control Measures for HCV3**

1. Demonstrate that forest managers supplying material under control are capable of identifying the values of HCV3 and protecting these values from threats by forest management activities. Pre-logging surveys shall be performed and available for review.
2. Demonstrate that there is effective legal protection of all values of HCV3 either within or outside of the protected area network.
3. Demonstrate that where Consultation with experts has been used these experts<sup>4</sup> have been agreed by stakeholders.

#### **Control Measures for HCV4**

1. Demonstrate that there is effective legal protection of all values of HCV4 either within or outside of the protected area network.
2. Demonstrate that wood is not sourced from areas where values of HCV4 are threatened by forest management activities.
3. Demonstrate that affected parties in water catchment areas have given their Free, Prior and Informed Consent before harvesting commences.

#### **Control Measures for HCV5**

1. Demonstrate that if forest management activities are occurring in areas containing values of HCV5 Indigenous Peoples, Traditional Peoples, local communities and any other affected parties have given their free, prior and informed consent before harvesting commences.

#### **Control Measures for HCV6**

1. Demonstrate that if forest management activity is occurring in these areas it is with the Free, Prior and Informed Consent of Indigenous Peoples, Traditional Peoples, local communities and any other affected parties.

### **CATEGORY 4 Wood from forests being converted to plantations and non-forest use**

1. Conversion is prohibited by legislation in the country from which the material under control is sourced.  
(Yes = go to 2) (No = go to 3)
2. Widespread illegal conversion does not occur in the unassessed area under consideration based on assessment made using the Global Forest Registry and other relevant sources.  
(Yes = pass, material can be classified as Controlled Wood for category 4) (No = go to 3)
3. The Organization shall demonstrate that suppliers have not engaged in significant conversion and are currently not directly or indirectly involved in conversion in any other MU within the country.  
(Yes = go to 4) (No = fail, material cannot be classified as Controlled Wood)

4. Conversion is not currently occurring within the MU from which wood is being sourced, except in circumstances where conversion:
  - a) Affects no more than 0.5% of the MU in the current or any future year and does not result in a cumulative total area converted in excess of 5% of the MU since November 1994;
  - b) Does not damage or threaten High Conservation Values, nor any sites or resources necessary to maintain or enhance those High Conservation Values; and,
  - c) Will produce clear, substantial, additional, secure long-term conservation benefits in the MU.

(Yes = pass, material can be classified as Controlled Wood for category 4) (No = fail, material cannot be classified as Controlled Wood)

**Please note: Requirements for conversion from plantation to non-forest use will be aligned with the outcomes of the IGI development process as well as the outcomes of ongoing conversion related discussion within the FSC Membership.**

**Conversion requirements in the National Risk Assessment Framework (FSC-PRO-60-002b) are going to be aligned to the approach presented in this standard.**

#### **CATEGORY 5 - Wood from forests in which genetically modified trees are planted**

1. GMO trees are not commercially used in sourcing area.  
(Yes = pass, material can be classified as Controlled Wood for category 5) (No = go to 2)
3. The Organization shall demonstrate that MU(s) where material under control is sourced from do not contain GMO trees.  
(Yes = pass, material can be classified as Controlled Wood for category 5) (No = fail, material cannot be classified as Controlled Wood)



## **Annex 1 Summary of the Controlled Wood evaluation process**

Summary of the steps required for Controlled Wood evaluation as prescribed in this standard:

1. Implement CoC requirements as per *FSC-STD-40-004*.
2. Develop written procedures covering all applicable elements of the standard.
3. Establish DDS (Section 4).
4. Identify supplies (Section 5, including CITES).
5. Identify supply areas: where is wood sourced? (Section 6).
6. Check risk designation in relevant NRA (for each supply area and for each CW category, using e.g. Global Forest Registry) and classify your supply areas according to Section 6.
7. For low risk areas no additional actions required – you can classify material under control as Controlled Wood. Keep documentation and monitor internally.
8. For specified risk supply areas:
  - Check for which categories risk is specified
  - Apply the Control Measures as prescribed in NRA
  - Check the effectiveness of Control Measures as a part of internal monitoring
9. For unassessed risk areas apply Section 10 of this standard: source only FSC certified material (Options A and B) or apply interim Control Measures (Option C)

The steps described above are illustrated in a flowchart on the next page.

## Flowchart of the Controlled Wood evaluation process

