

New interpretations published on the FSC Website (November 2013)

Chain of Custody

- **Interpretation on FSC-STD-20-011 (V1-1)**

<https://ic.fsc.org/fsc-std-20-011-coc-evaluations.441-19.htm>

Question:

Can an on-site audit exceptionally be replaced by a desk audit if the organization is located in a country or region with an actual demonstrated security risk for the life or health of auditors?

Answer:

In the case of a demonstrated security risk for the life or health of auditors, the CB may apply for derogation from PSU to replace an on-site audit by a desk audit. The application shall include:

- a) Certificate code of the company;
- b) Activities under the scope of the certificate (products and processes);
- c) Evidences of security risks confirmed through verifiable public sources (e.g. an official travel warning);
- d) Other additional information, as required by FSC.

Derogation applications will be evaluated on a case by case basis.

Normative Reference: FSC-STD-20-011 V1-1

Requirement(s): Clause 9.3; 19.1

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Forest Management

- **Interpretations on FSC-STD-20-007 (V3-0)**

<https://ic.fsc.org/fsc-std-20-007-fm-evaluations.441-9.htm>

Question:

According to FSC-STD-20-007, primary or secondary processing facilities associated with the forest management enterprise shall be inspected for conformity with the applicable CoC standard(s), and a separate report which meets the requirements of FSC-STD-20-011 Annex 1 shall be prepared.

Are there any further definitions or criteria (concerning size, number of workers, quantity of processed material, permanent vs. mobile facilities, permanent or occasional workers in charge of processing) to define the "processing facility"? If so, please specify.



Answer:

No, there is no further definition or criteria in FM or CoC standards. Log cutting or de-barking units and small portable sawmills associated with the forest management enterprise are an exception to this clause and they can be evaluated as part of the 'normal' forest evaluation procedures. Small sawmills which are only in use temporarily or log chipping units also do not require a separate CoC certificate.

Keyword(s): Processing facilities, FM/CoC, CoC certificate

Normative Reference: FSC-STD-20-007

Requirement(s): Clause 1.5.

Question:

Can a FM/CoC certificate include primary or secondary processing facilities?

Answer:

No, primary or secondary processing facilities associated with the forest management enterprise shall be inspected for conformity with the applicable CoC standard(s), a separate report which meets the requirements of FSC-STD-20-011 Annex 1 shall be prepared and a separate CoC certificate shall be issued.

This does not apply to log cutting or de-barking units and small portable sawmills associated with the forest management enterprise. They can be evaluated as part of the 'normal' forest evaluation procedures

Keyword(s): FM/CoC, joint certification, CoC certificate

Normative Reference: FSC-STD-20-007 (V3-0)

Requirement(s): Clause 1.5

Question:

A large remote plantation in Tanzania includes extensive infrastructure (housing, hospital, sawmill, processing plant).

1. What aspects of these operations should be assessed within the scope of the FM/CoC operation (as distinct from a separate CoC certificate)?
2. What if the sawmill fails to get the CoC certification?

Extension of existing interpretation:

1. The scope of FM/CoC certification includes the assessment of forest management and the tracking and tracing system of forest products (incl. NTFPs) within the forest management unit up to the forest gate.

If the housing and hospital are within the FMU and linked to the forest management activities and the Organization has directly or indirectly responsibility, they have to be assessed according to the FM standards.

Primary or secondary processing facilities associated with the forest management enterprise shall be assessed according to the CoC standards, with the exception of log cutting or debarking units and small portable sawmills associated with the forest management enterprise. The sawmill and the processing plant shall be assessed according to the CoC standards.

2. If the sawmill is eligible to be included in the scope of FM/CoC certificate and fails to comply with CoC requirements, the products coming out of the sawmill are not eligible to carry the FSC Logo.

If the sawmill is not within the scope of FM/CoC certificate, it requires its own CoC certification. Failure to comply with the applicable CoC requirements would not allow issuing a CoC certificate.

Keyword(s): FM/CoC, joint certification, CoC certificate

Normative Reference: FSC-STD-20-007 (V3-0)

Requirement(s): Section D, Clause 1.5

Question:

Regarding to special or adapted requirements for Type II groups:

1. Can CBs certify RMUs as single FMU certificate?
2. If 30-005 is applicable, which are the requirements for RMUs (group entity but also group members) if group members have almost no rights and responsibilities?

Answer:

1. No, the RMU can be used as the basis for sampling as if it were a single FMU certificate, but it has to comply with the rest of requirements for groups and be certified as a group.
2. RMUs shall comply with all the applicable requirements in FSC-STD-30-005 (V1-0).

Keyword(s): RMU, single certificate, requirement.

Normative Reference: FSC-STD-20-007 (V3-0) / FSC-STD-30-005 (V1-0)

Requirement(s): Section D / Part 1



Question:

FSC-STD-20-007 requires that new FMUs (e.g. group members or newly acquired FMUs) added to the scope of the certificate since the main evaluation shall be sampled at the rate of a main evaluation.

Shall they also be sampled at the rate of a main evaluation, if they have previously been certified under another group scheme or an individual certificate?

Answer:

New FMUs added to the scope of an existing certificate that have been previously certified (within the last 6 months) may be sampled at the rate as for annual surveillance, instead of the rate of the main evaluation.

Keyword(s): new FMUs, certificate scope, rate of sampling, main evaluation, surveillance.

Normative Reference: FSC-STD-20-007 (V3-0)

Requirement(s): Clause 6.3.5

Pesticides

- **Interpretation on FSC-GUI-30-001 (V2-0)**

<https://ic.fsc.org/fsc-gui-30-001-policy-guidance.441-24.htm>

Question:

Can a Certificate Holder (CH) use within the Forest Management Unit (FMU) or on its borders wooden fence posts that have been manufactured with chemicals (i.e. pressure treated lumber), if these chemicals are on the FSC Highly Hazardous Pesticides (HHP) list?

Answer:

Yes, provided that the posts are not treated with HHPs in the FMU. Otherwise, the CH is required to apply for a temporary derogation.

If waste is generated from treated posts, it shall be disposed in an environmentally appropriate manner at off-site locations.

Keyword(s): Highly hazardous pesticides, fencepost, FMU.

Normative Reference: FSC-GUI-30-001 (V2-0)

Requirement(s): Section 3.



- **Interpretation on FSC-PRO-01-004 (V2-2)**

<https://ic.fsc.org/fsc-gui-30-001-policy-guidance.441-24.htm>

Question:

Shall a Certification Body (CB) inform the FSC Policy and Standard Unit (PSU) using Annex 2 if a 'highly hazardous' pesticide (HHP) was applied by a Governmental authority directly or by a third party by order of a Governmental authority, provided that the order comes from an entity operationally independent from the forest management authorities?

Answer:

The CB shall inform the FSC PSU using the form in Annex 2 in cases where the use of a HHP has been ordered by governmental authorities.

If the HHP was applied directly by a Governmental authority or by a third party by order of a Governmental authority, the CB shall inform the FSC PSU but does not need to use the form in Annex 2.

The CH will inform the CB about the use of the HHP and maintain records of its use. The CB shall verify this during the surveillance.

Keyword(s): Emergency, notification, HHP, authority, order

Normative Reference: FSC-PRO-01-004 (V2-2)

Requirement(s): clause 8.3