

FSC® DIRECTIVE

FSC Directive on Chain of Custody Certification

FSC-DIR-40-004 EN



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Title: FSC Directive on Chain of Custody Certification

Document reference code: FSC-DIR-40-004 EN

Scope: International

Contact: FSC Policy and Standards Unit

E-mail for comments: policy.standards@fsc.org

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The Forest Stewardship Council (FSC) is an independent, not for profit, non-government organisation based in Bonn, Germany.

The mission of the Forest Stewardship Council is to support environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

FSC develops, supports and promotes international, national and regional standards in line with its mission; evaluates, accredits and monitors certification bodies which verify the use of FSC standards; provides training and information; and promotes the use of products that carry the FSC logo.

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Foreword

FSC received various comments from Certification Bodies and stakeholders requesting a reduction in the number of normative documents to make the documented certification system more comprehensible. FSC therefore combined all previous Advice Notes into single documents which are called “directive”. A directive includes all advices issued in relation to a single standard. The relation to a standard is reflected in the document code. Where new interpretation is approved, these will be added to the directive and the revised document will be reissued.

The intention of this document is to standardize understanding and implementation of requirements by FSC accredited certification bodies and certificate holders.

This document will be revised as required. The content of the directive will be incorporated into the related standards in each major review as feasible.

Changes and amendments to the directive will be announced to the FSC Network immediately.

Note on use of this directive

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

A Scope

This document provides FSC's formal interpretation of the requirements included in FSC-STD-40-004.

B Effective date

The effective date is specified for each advice separately.

C References

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

FSC-STD-40-004 Standard for Chain of Custody Certification

D FSC normative documents replaced by this Directive

FSC-ADV-40-004 V2-0 Expiry of transitory requirements specified by FSC-ADV-40-004.

FSC-ADV-40-017 V1-1 FSC Certified CoC Contractors

FSC-GUI-20-200 FSC Guidelines for Certification Bodies (Part 3)

E Terms and definitions

Terms and definitions are provided in *FSC-STD-01-002 FSC glossary of terms* and in *FSC-STD-40-004 Standard for Chain of Custody Certification*. Further advice-related definitions may be provided in the context of each advice.

Please send any comments or suggestions regarding this document to:

FSC International Center
– Policy and Standards Unit –

Charles-de-Gaulle Str. 5
53113 Bonn, Germany

Phone: +49-228 / 367-660

Fax: +49-228 / 367-6630

E-Mail: policy.standards@fsc.org

Part 1 General Issues

- 1 The FSC Directive is providing certification bodies and other stakeholders with clear advices on the implementation of FSC's international policies and standards. A directive is designed to provide formal advice in relation to a single specific issue or question raised with the FSC International Center. All advices on a series of issues related to a specific FSC international policy or standard are collected in one document to improve accessibility of interpretations for certification bodies, certificate holders and interested parties.
- 2 If a certification body is in doubt about the correct implementation of an FSC policy or standard, the certification body must request clarification from the FSC Policy and Standards Unit. If required, such clarification will be provided in the form of a new directive.
- 3 Prior to the finalisation of an advice, a certification body may make its own decision in relation to a question for which clarification has been sought. In such a case, responsibility for the consequences of the decision shall rest exclusively with the certification body concerned. Formal advice subsequently provided by the FSC International Center will be applicable retrospectively.
- 4 The advices provided in this document represent the formal position of the FSC International Center unless and until it is superseded by the approval of a more recent policy, standard, or advice. In such cases the requirements specified in the more recent document shall take precedence.
- 5 Certification bodies are required to comply with the most recent formal advices, and the FSC Accreditation Business Unit will base its evaluations and issue of corrective actions on these.
- 6 Finalised advices are approved by the Head of the Unit of the Policy and Standards Unit or the FSC Director General. If a certification body wishes to contest the advice provided it may do so by requesting a formal review and decision by the FSC Policy and Standard Committee. Until and unless such a review and decision has been finalised, the certification body shall continue to comply with the position of the FSC International Center.
- 7 Directives are under continual review and may be revised or withdrawn in response to new information, experience or changing circumstances, for example by the development of new policies or standards approved by the FSC Board of Directors.

Part 2 FSC Advices

ADVICE-40-004-01	FSC certified CoC contractors
Normative reference	FSC-STD-40-004 V2-0 Section 12
Effective date	FSC certified CoC organizations may apply this advice from 9th February 2010 and, if applicable, shall be assessed for compliance from 1st January 2011 onwards.
Terms & definitions	The terms defined in FSC-STD-20-011 and FSC-STD-40-004 apply. The following terms are introduced by this Advice Note and are put in <i>italics</i> throughout the document: Contracting organization: Individual, company or other legal entity contracting a contractor for the production or processing of an FSC certified product under an outsourcing agreement. NOTE: The contracting organization may or may not be an FSC certified CoC organization. Part C of this Advice Note is structured according to the FSC certified status of the contracting organization (see Part C, Table 1). Contractor: Individual, company or other legal entity contracted by a contracting organization for the production or processing of an FSC certified product under an outsourcing agreement. NOTE: In the context of this Advice Note, the contractor is an FSC certified organization (see Part C, Table 1). FSC certified CoC organization: Individual, company or other legal entity holding a valid FSC Chain of Custody certificate which confirms that appropriate procedures are in place for the production, processing or trade of a specific product – or that FSC certified CoC contractors are used for this purpose – that allow the organization to sell, provide or promote the product with FSC claims. Outsourcing agreement: A written agreement between a contracting organization and a contractor about the service of producing or processing an FSC certified product or material, where the contracting organization retains control of and responsibility for the purchasing of input material from the (billing) supplier and for the sale of the output product to the customer. Input material may be shipped from the contracting organization or from the (delivering) supplier to the contractor and the output product may be returned or shipped from the contractor to the contracting organization or to the contracting organization's customer. Supplier (billing): FSC certified CoC organization selling material with FSC claims to the contracting organization. Supplier (delivering): FSC certified CoC organization delivering the material to the contractor and selling the material with FSC claims to the billing supplier or to the contracting organization.
Background	This directive deals with the implications for FSC certified CoC organizations, either functioning as or making use of FSC certified CoC contractors. In particular, clarification is provided on the following issues: • under which conditions contract work for an FSC certified product can be provided for non-FSC certified CoC contracting organizations; • what the benefits and implications are for FSC certified CoC contracting organizations that use FSC certified CoC contractors. The FSC Standard for Chain of Custody Certification (FSC-STD-40-004) requires organizations that take legal ownership of materials and want to

	maintain or change the FSC claim associated with the output product to have FSC Chain of Custody certification.¹ The standard further specifies the requirements to follow for FSC certified CoC contracting organizations in order to use non-FSC certified CoC contractors for this purpose. The questions, however, what the implications are for an FSC certified CoC contracting organization to use FSC certified CoC contractors, and whether contract work for an FSC certified product could be provided also for non-FSC certified CoC contracting organizations were not consistently dealt with in practice. In particular the latter question required some fundamental judgement, as some certification bodies considered contract work for non-FSC certified CoC contracting organizations to be generally not in line with standard requirements, while others found outsourcing arrangements where the non-FSC certified CoC contracting organization would not obtain physical possession of the input material to be acceptable under certain additional stipulations. This Advice Note follows the latter approach based on the judgement that there would not be an increased risk associated with such outsourcing arrangements for non-FSC certified products to be labelled and sold as FSC certified, provided that additional safeguards were in place. The Advice Note stipulates these safeguards and aims at providing the relevant answers to the questions raised above.																				
Advice	<table><tr><th colspan="3">Table 1: Outsourcing scenarios dealt with by this Advice Note</th><th colspan="2">FSC certified status</th></tr><tr><th>Section</th><th>Requirements for</th><th>Details</th><th>Contractor</th><th>Contracting organization</th></tr><tr><td>1</td><td>Contractor</td><td>Providing contract work for non-FSC certified CoC organizations</td><td>FSC</td><td>non-FSC</td></tr><tr><td>2</td><td>Contracting organization</td><td>Using FSC certified CoC contractors</td><td>FSC</td><td>FSC</td></tr></table> 1 Providing contract work for non-FSC certified CoC organizations – conditions for FSC certified CoC contractors NOTE: This section applies for outsourcing arrangements where the contractor is an FSC certified CoC organization and the contracting organization is a non-FSC certified CoC organization. Under this scenario, the contracting organization cannot sell the product with an FSC claim to commercial customers. The contracting organization may, however, use the FSC trademarks to promote the product towards final consumers as specified by FSC-TMK-50-201. Eligibility 1.1 FSC certified CoC contractors are only eligible to provide FSC certified products for non-FSC certified CoC contracting organizations, if: 1.1.1 The input material for the contract work is shipped directly from the delivering supplier(s) to the contractor, i.e. the contracting organization does not obtain physical possession of the input material. 1.1.2 The contractor is provided with a copy of the invoice(s) from the delivering supplier(s) and, if not identical, from the billing supplier(s) that include(s) information sufficient to link the invoice(s) and	Table 1: Outsourcing scenarios dealt with by this Advice Note			FSC certified status		Section	Requirements for	Details	Contractor	Contracting organization	1	Contractor	Providing contract work for non-FSC certified CoC organizations	FSC	non-FSC	2	Contracting organization	Using FSC certified CoC contractors	FSC	FSC
Table 1: Outsourcing scenarios dealt with by this Advice Note			FSC certified status																		
Section	Requirements for	Details	Contractor	Contracting organization																	
1	Contractor	Providing contract work for non-FSC certified CoC organizations	FSC	non-FSC																	
2	Contracting organization	Using FSC certified CoC contractors	FSC	FSC																	

¹ FSC-STD-40-004 V2-0, Section A

	related transport documentation to each other. NOTE: Information on prices can be blacked out. 1.1.3 The output product provided by the contractor is: a) a finished product; b) FSC labelled; and c) branded with the name, label or other identifying information of the contracting organization. Labelling 1.2 For each contract work, the contractor shall maintain control of applying the correct FSC label. 1.3 The contractor shall ensure that its license code is used in the FSC label and submits the proof to its certification body for approval. 2 Using FSC certified CoC contractors – conditions for FSC certified CoC contracting organizations NOTE: This section applies for outsourcing scenarios where the both the contractor and the contracting organization are FSC certified CoC organizations. Under this scenario, the product does not have to be FSC labelled or a finished product. Outsourcing agreement 2.1 The outsourcing agreement shall specify the following: 2.1.1 that the contractor provides the service under his FSC Chain of Custody system, 2.1.2 that the contractor makes available relevant records and documentation to the contracting organization's certification body upon request, and 2.1.3 that the contracting organization's license code shall be used, if the product shall be FSC labelled. 2.2 The outsourcing agreement and, if FSC certified CoC contractors are used for specific processes exclusively, the contracting organization's control system for the outsourced process do not need to cover the following requirements stipulated by FSC-STD-40-004: – clauses 12.1.1 c), second sentence, and 12.1.1 d); – clause 12.2.1; – clauses 12.5.1, 12.6.1, and 12.7.1 NOTE: FSC certified CoC contractors may use their own subcontractors in accordance with FSC-STD-40-004, section 12. Supplier validation 2.3 The contracting organization shall apply the provisions for 'supplier validation' as specified by FSC-STD-40-004 also to the contractor. Labelling 2.4 The contracting organization shall maintain control and responsibility of the correct FSC label being applied, if product labelling is part of the outsourced processing. 2.5 The contracting organization shall ensure that its license code is used in the FSC label and shall submit the proof to its certification body for approval.
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	Auditing 2.6 FSC certified CoC contractors are exempted from a potential inspection by the contracting organization's certification body, if the outsourced process is covered by the scope of the contractor's certificate. NOTE: The contractor is subject to evaluation and monitoring by its own certification body.
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ADVICE-40-004-02	After the certificate issuance, when the company products will be eligible to carry the FSC logo?
Normative reference	FSC-STD-40-004 V2-0 Clause 10.1.1
Effective date	March 2005
Background	A forest product manufacture is often a continuous process. At the time that a certificate is issued there are likely to be products undergoing manufacture, products that have been manufactured but not yet shipped, and products that have been shipped but not yet put on sale by the buyer. Which of these products are eligible to carry the FSC Logo?
Advice	1 The scope of the certificate defines the point at which the certified chain of custody starts, and the point at which it finishes. The chain of custody certificate provides a credible guarantee of compliance with the requirements of the specified standards between these points. This guarantee is valid from the time that the certificate is issued. Any product which is within the defined scope of the certificate at the time the certificate is issued may be considered to comply with the requirements of the applicable standard(s). Such products may be eligible for sale as 'FSC-certified' products. Products which have already left the scope of the certificate at the time the certificate is issued cannot be considered to be certified. 2 Normally this will mean that products that have already been sold, or shipped, prior to the issue of a certificate may not be described as certified, and are not eligible to carry the FSC Logo. 3 Clearly a company cannot issue an invoice describing products as certified prior to the issue of chain of custody certificate. Products sold without such an invoice cannot be described as certified, and are not eligible to carry the FSC Logo. 4 In the case of joint forest management and chain of custody certification, application of this guideline means that timber that had been felled prior to the issue of a certificate, but which has not yet been sold by the forest management enterprise may be sold as certified. 5 Equivalent considerations apply when a certificate is withdrawn or expires. Products which left the chain of custody whilst the certificate was valid were certified, and remain certified even after the certificate has been withdrawn. Products which have not yet left the chain of custody at the time the certificate is withdrawn will not be certified.

ADVICE-40-004-03	Reduced labelling threshold of 50% for chip and fibre based products
Normative reference	FSC-STD-40-004 V2-0, Clause 11.2.1a and 11.2.2
Effective date	14 February 2011
Terms & definitions	Company: the legal entity that must comply with FSC-STD-40-004 V2-0 which is either the certificate holder or an applicant for certification.
Background	When the new Chain of Custody standard “FSC-STD-40-004 (Version 2): FSC Standard for Chain of Custody Certification” was approved in November 2007, the following previously established exemption was maintained by means of an Advice Note: • A labeling threshold of 50% for chip and fibre based products under a percentage (or transfer) system. NOTE: The exemption detailed in this advice is specifically related to the eligibility for <u>labelling</u> FSC products and not to the eligibility of producing or selling products with an FSC claim on invoices.
Advice	1 FSC certificate holders may request authorization from their certification bodies to continue labelling chip and fibre products based on a reduced labelling threshold of 50% until 31 December 2015. 2 Authorization shall only be granted for those product groups with chip and fibre components registered as being commercially produced based on a labelling threshold of 50% before 01 April 2011. 3 Certificate holders operating a transfer system that have not registered their product groups can also label products based on a labelling threshold of 50% in case they are able to demonstrate to their Certification Body that the material they receive has already been registered by a previous company or the material was received with an FSC on-product label. a) In the first case, sales and delivery documents issued by the supplier shall include the additional claim “registered” (e.g. “FSC Mixed 50% registered”); b) In the second case, the certificate holder shall retain evidence that the product was received with an on-product FSC label (e.g. packaging or product sample). 4 Certificate holders interested in the product registration shall submit the following documentation to their Certification Body until 31 March 2011: a) A list of product groups with products labelled on the basis of a 50% threshold. b) Copies of sales invoices for the registered products in each listed product group as evidence that they have been commercially produced. 5 Certification bodies shall upload the approved registration form into the FSC database following the procedures to make it publicly available. No new product groups can be added to this list after 31 March 2011. NOTE: The registration form may be translated and uploaded in the language used by the company as long as the product group names are also included in English as in the company’s FSC product group list.

	6 Product groups registered by certification bodies according to this advice shall be in compliance with a labelling threshold of 70% as of 01 January 2016. NOTE: Companies that do not comply with the requirements of this advice are not eligible to label FSC products based on a 50% threshold as of 01 April 2011, and therefore shall apply a labelling threshold of 70% from this date onwards.
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ADVICE-40-004-04	Use of uncontrolled co-products
Normative reference	FSC-STD-40-004 V2-0, Clauses 3.1.2, 3.3.1 and 3.4.1a, Footnote 10
Effective date	01 April 2011
Terms & definitions	Company: the legal entity that must comply with FSC-STD-40-004 V2-0 which is either the certificate holder or an applicant for certification.
Background	When the new Chain of Custody standard “FSC-STD-40-004 (Version 2): FSC Standard for Chain of Custody Certification” was approved in November 2007 the following previously established exemption was maintained by means of an Advice Note: Exemption of co-products from uncertified virgin material input to be confirmed as controlled material.
Advice	- Companies may request authorization from their Certification Bodies to continue using uncontrolled co-products in FSC Mixed and FSC Controlled Wood product groups until 31 December 2012. - Authorization shall only be granted for those product groups with chip and fibre components registered as being commercially produced using uncontrolled co-products before 01 April 2011. - To request authorization, companies shall submit the following documentation to their Certification Body until 31 March 2011: - A list of product groups with products containing uncontrolled co-products. - Copies of sales invoices for the registered products in each listed product group as evidence that they have been commercially produced. - Certification bodies shall upload the approved registration form into the FSC database. No product groups can be added to this list after 31 March 2011. NOTE: The registration form may be translated and uploaded in the language used by the company as long as the product group names are also included in English as in the company’s FSC product group list. - All product groups registered by certification bodies according to this advice for which the use of uncontrolled co-products had been approved shall be in compliance with FSC-STD-40-005, specified by the Advice 40-005-17 (in FSC-DIR-40-005), from 01 January 2013. NOTE: All non-registered product groups shall be in compliance with FSC-STD-40-005, specified by the Advice 40-005-17 (in FSC-DIR-40-005), from 01 April 2011.

ADVICE-40-004-05	Identification of FSC claims on sales and delivery documents
Normative reference	FSC-STD-40-004 V2-0, Clause 6.1
Effective date	14 February 2011
Terms & definitions	N/A
Background	The FSC Chain of Custody standard requires certificate holders to identify FSC certified products on sales and delivery documentation in order to pass on the FSC claim of certified products to subsequent customers. However, several organizations have limitations with providing complete FSC claims that are required due to space constraints in these documents.
Advice	When the certificate holder has demonstrated it is not able to include the required FSC claim as specified in the FSC Chain of Custody standard in sales and delivery documents due to space constraints, through an exception, the certification body can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company's webpage with verifiable product information). This practice is only acceptable when the certification body is satisfied that the supplementary method proposed by the company complies with the following criteria: a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the document; b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary evidence; c) In cases where the sales and delivery documents contain multiple products with different FSC Claims, a clear identification for each product shall be included to cross-reference it with the associated FSC claim provided in the supplementary evidence.

ADVICE-40-004-06	Which components of a product need to be certified?
Normative reference	FSC-STD-50-001 V1-2, Clause 2.4
Effective date	30 March 2011
Terms & definitions	Eligible input: Virgin and reclaimed material input that is eligible to enter a specific FSC product group depending on its material category (e.g. FSC Pure, FSC Controlled Wood, etc.). Inserts: Enclosed advertising in a periodical (e.g. newspaper, magazine) that is distributed through the carrier publication and is a clearly distinguishable element in relation to the other pages of the periodical (e.g. different paper, size, etc). For example, inserts may take the form of return cards, coupons, recipe booklets, forms, booklets, brochures, gift premiums, reply envelopes, etc.
Background	Clause 2.4 of <i>FSC-STD-50-001 Requirements for the use of FSC Trademarks by Certificate Holders</i> establishes that “The FSC label shall not be used to make a partial claim about a product. Where permanent parts of the product (other than any packaging materials or non-forest based materials) are not covered by FSC certification, the FSC label shall not be used.” FSC receives repeated inquiries from different stakeholders in relation to which components of a product are considered to be “permanent”, due to the fact that these products can contain several forest-based elements that are included in the product with secondary functions such as transportation, protection, etc. This advice aims to clarify which of these components are

	required to be certified and provides examples of practical implementation.																													
Advice	All components of a product which are made of or contain material originating from forests that are incorporated into the product to fulfil its function for the consumers' specific need shall be certified. It represents that all certified components of a product shall comply with the definition of eligible input (e.g. FSC Pure, FSC Controlled Wood, etc.) and its quantities in volume or weight shall count towards the calculation of FSC product composition determining its eligibility to carry the FSC label. Forest-based components that have secondary functions in the product (e.g. for transportation, protection, etc.) don't need to be certified unless they are added to the product with a functional purpose (e.g. If the product will have its function compromised by the removal of this secondary component, then this component also needs to be certified). Packaging that is made from forest-based inputs (e.g. paper, wood, etc.) is considered a separate element from the product inside. Therefore, the organization can choose to certify only the packaging or its content individually, or both. The FSC label generator allows the creation of labels with specific product type claims (e.g. wood, paper, packaging). Thus, in cases where, the product contains wood and paper components that are clearly separate elements, the organization can opt to certify them independently, provided that the appropriate product type claims is applied on the FSC label. To avoid risks of misinterpretation in relation to which components of the product are certified, an additional clarification statement is recommended. The table below provides some examples of practical application of this advice and it is not expected to cover all range of FSC certified products:																													
	<table> <tr> <th>Examples of products</th><th colspan="2">Which components of a product need to be certified?</th></tr> <tr> <td rowspan="3">Matches & Matchbox</td><td>Matches</td><td>Yes</td></tr> <tr> <td>Box</td><td>Optional</td></tr> <tr> <td colspan="2">Rationale: Matches and matchbox are distinguishable components that can be certified independently when the FSC label claim is sufficiently clear to avoid misinterpretations. However, when the matches and matchbox are made with the same material (e.g. paper), both shall be certified in order to carry the FSC label.</td></tr> <tr> <td rowspan="4">Games</td><td>Paper and wood components</td><td>Yes</td></tr> <tr> <td>Instructions manual</td><td>Optional</td></tr> <tr> <td>Packaging</td><td>Optional</td></tr> <tr> <td colspan="2">Rationale: The wood and paper components of the game have a functional purpose and therefore are the components that require certification. However, a more flexible approach is also possible with the condition that the proper label statement is applied. For example, when only the wood components are certified, the FSC label shall contain the claim "wood" and the paper components don't need to be certified. On the other hand, when only the paper components are certified, the FSC label shall contain the claim "paper" and the wood components don't need to be certified. The instructions manual and packaging are not product components and for this reason don't need to be certified.</td></tr> <tr> <td rowspan="4">Books</td><td>Cover</td><td>Yes</td></tr> <tr> <td>Internal paper</td><td>Yes</td></tr> <tr> <td>Dust jacket and slip cases</td><td>Optional</td></tr> <tr> <td>Wraparound band</td><td>Optional</td></tr> </table>	Examples of products	Which components of a product need to be certified?		Matches & Matchbox	Matches	Yes	Box	Optional	Rationale: Matches and matchbox are distinguishable components that can be certified independently when the FSC label claim is sufficiently clear to avoid misinterpretations. However, when the matches and matchbox are made with the same material (e.g. paper), both shall be certified in order to carry the FSC label.		Games	Paper and wood components	Yes	Instructions manual	Optional	Packaging	Optional	Rationale: The wood and paper components of the game have a functional purpose and therefore are the components that require certification. However, a more flexible approach is also possible with the condition that the proper label statement is applied. For example, when only the wood components are certified, the FSC label shall contain the claim "wood" and the paper components don't need to be certified. On the other hand, when only the paper components are certified, the FSC label shall contain the claim "paper" and the wood components don't need to be certified. The instructions manual and packaging are not product components and for this reason don't need to be certified.		Books	Cover	Yes	Internal paper	Yes	Dust jacket and slip cases	Optional	Wraparound band	Optional	
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Books	Cover	Yes																												
	Internal paper	Yes																												
	Dust jacket and slip cases	Optional																												
	Wraparound band	Optional																												

		Rationale: The cover and internal paper are needed for the accomplishment of the product's function, and for this reason shall be certified. Additional items such as dust jackets, slip cases and wraparound band are not necessary for the accomplishment of the product's function and therefore don't need to be certified.	
Notebooks	Cover	Yes	
	Adhesive paper sheets	Yes	
	Internal paper	Yes	
	Rationale: Notebook cover, internal paper, adhesive paper sheets are permanent product components and are needed for the accomplishment of the product's function. Therefore, all these components shall be certified.		
Magazines	Cover	Yes	
	Internal Paper	Yes	
	Inserts	Optional	
	Detachable promotional stickers	Optional	
	Rationale: Magazine cover and its internal paper are needed for the accomplishment of the product's function and therefore shall be certified. Inserts and detachable promotional stickers are not needed for the accomplishment of the product's function and therefore, independently of the fixation method (bounded, glued, loose, etc.), don't need to be certified.		
Toilet Paper	Toilet paper	Yes	
	Cardboard roll	Optional	
	Rationale: The toilet paper is the component sought by the consumer to fulfil its specific need. The cardboard roll is a method of dispensing or transporting the paper and can be separated from the product without compromising its function. For this reason, the cardboard roll does not need to be certified. The same rationale applies for all paper products sold in rolls and bobbins (e.g. paper bobbins, rolled thermal paper, paper towels).		
Boxes of Tissues	Tissues	Yes	
	Box	Optional	
	Rationale: The tissue paper is the component sought by the consumer to fulfil its specific need. The box is a method of dispensing or transporting the paper and can be separated from the product without compromising its function. For this reason, the box doesn't need to be certified.		
Furniture	Furniture	Yes	
	Packaging	Optional	
	Price tag or promotional label	Optional	
	Rationale: The furniture is the component sought by the consumer to fulfil its specific need. The packaging, price tag and promotional label have secondary functions in the product and can be separated from the furniture without compromising its function. For this reason, the packaging and price tag or promotional label doesn't need to be certified.		
Adhesive Labels in Sheets	Stickers	Yes	
	Release paper	Optional	
	Rationale: The sticker is the product sought by the consumer and the release paper has a secondary function (transporting the product). Therefore, the release paper doesn't need to be certified.		

	Pre-fabricated houses (or entire houses sold as an unit)	Permanent structural components of the house, including flooring, roof, walls, stairs, windows and doors.	Yes
		Other secondary wood elements (e.g. furniture, cabinets, toilet seats, shelves, fences, wall paper).	Optional
		Rationale: A house sold as a unit can be claimed as an FSC certified product if all permanent structural components made with forest-based materials that are added to the house to fulfil the specific consumer's need (a place to live in) are certified. Other secondary wood elements (e.g. furniture, cabinets, toilet seats, shelves, fences, wall paper) are not permanent components of the house. Therefore, they don't need to be certified. Houses made with non-forest based materials (e.g. bricks) that have specific wooden components (e.g. doors, flooring) incorporated cannot be claimed as an FSC certified house. However, the organization can label and promote these components individually; identifying the FSC certified elements to the consumers.	
	Wood flooring with paper or veneer inlays	Wood	Yes
		Paper or veneer inlays	Yes
		Rationale: The wood and paper/veneer inlays are not distinguishable elements by consumers and cannot be separated without compromising the products function. Therefore, both the wood and paper or veneer inlays shall be certified in order to claim the flooring as a FSC certified product.	

ADVICE-40-004-07	Sale of FSC certified products through non-FSC certified auction entities
Normative reference	FSC-STD-40-004, Scope and Clause 6.1
Effective date	30 March 2011
Terms & definitions	Auction: A process of buying and selling goods or services by offering them up for bid, taking bids, and then selling to the winning (generally highest) bidder. The auction house, auctioneer, log market, etc., managing the auction does not gain legal ownership of the goods/services for sale but does collect the funds due and issues the sales invoice to the winning bidder.
Background	This advice aims to provide clarification on whether or not auction houses, log markets or other related entities need to be certified. If so, define the required procedures in order to ensure the traceability of the products traded by these organizations. FSC-STD-40-004 establishes that Chain of Custody certification is required for all organizations that want to ☒ produce and sell FSC-certified materials or products; or ☒ produce and promote FSC-certified products; or ☒ trade materials or products with FSC claims. NOTE: Chain of Custody certification is not required for organizations that do not gain legal ownership of such materials or products but simply arrange for buyer and seller: a) to make a deal without taking physical possession (often called an 'agent'); or b) to transport the materials or products.

Advice	Auctioning entities that do not gain legal ownership of FSC certified products during trading activities are not required to be FSC chain of custody certified, even when the auctioning entity takes physical possession of the product. Non-certified entities are not permitted to include FSC claims or certification codes on their own sales or transport documents. In order for the customer (winning bidder) to consider material purchased through a non-FSC certified auction entity as FSC certified, a supplementary letter or transport document must be provided by the certified supplier to the customer including all information required by FSC-STD-40-004 V2-0, 6.1.1.
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ADVICE-40-004-08	Non-conforming product
Normative reference	FSC-STD-40-004 V2-1 Clauses 1.2.1 and 10.1.1
Effective date	01 November 2012 Amended 27 February 2013
Terms & definitions	Non-conforming product: Product or material for which an organization is unable to demonstrate that it complies with FSC eligibility requirements for making claims and/ or for using the FSC on-product labels. Small COC enterprises: Organizations with: - No more than 15 employees (full time equivalent), or - No more than 25 employees (full time equivalent) and a maximum total annual <u>turnover</u> of US\$ 1,000,000.
Background	Implementation of Chain of Custody procedures and control systems as required by FSC-STD-40-004 aim to ensure that non-conforming products do not occur. This advice introduces an additional safeguard to prevent non-certified products from being delivered as certified, by requiring that procedures are put in place to handle non-conforming products. Specific requirements are included to apply to cases where non-conforming products are detected after they have been supplied to a customer. The action taken to address the issue of non-conforming product is targeted to the organization that is responsible for the nonconformity, but it may also affect onward buyers and sellers e.g. in the event that a product is re-called.
Advice	- The organization shall have a documented procedure defining the controls and related responsibilities and authorities for dealing with non-conforming products. The organization's chain of custody system shall be designed to ensure that products which do not conform to FSC requirements are identified and controlled to prevent its unintended delivery. NOTE: Small COC enterprises are not required to have the procedure in writing. - In case non-conforming products are detected after they have been delivered, the organization shall: - immediately cease to sell any non-conforming products held in stock; - identify all relevant customers, and advise those customers in writing within three (3) business days of the non-conforming product and maintain records of that advice; - analyse causes for occurrence of non-conforming products and implement measures to prevent its re-occurrence.

	d) notify their certification body; e) cooperate with the certification body in order to allow the certification body to confirm that appropriate action is taken to correct this non-compliance.
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ADVICE-40-004-09	Minor components
Normative reference	FSC-STD-40-004 V2-1, Clause 6.1.3 and Section 13
Effective date	01 November 2012 Amended 27 February 2013
Background	Minor components were first introduced to the FSC system in 2007. They are forest based materials (timber and non-timber forest materials) that can be exempted from the requirements for Chain of Custody control, according to the requirements of FSC-STD-40-004 V2-1. In early 2012, following a mandate of the FSC Board of Directors, FSC initiated an updating process of its standards to ensure harmonization with timber legality legislations, such as the EU Timber Regulation (EUTR), US Lacey Act, FLEGT and the Australian Illegal Logging Prohibition Act. As a consequence of this process, FSC identified the need to phase out the exemption for minor components.
Advice	1. From 01 January 2013 onwards, Clause 6.1.3 of FSC-STD-40-004V2-1 will also apply to organizations selling semi-finished products containing minor components below 1% of the product composition. The following claim shall be provided to customers: <i>"This product contains "x" of minor components"</i>, where "x" is the quantity in volume, weight or percentage of minor components. 2. From 01 March 2013, uncertified and uncontrolled minor components shall no longer be used in products and commercial activities (such as import, export, placing on the market, processing, etc.) in countries where timber legality legislation applies and where these products and activities are included in the scope of the legislation (including any official interpretation and guidance). From this date onwards, these minor components shall be made of FSC certified or FSC Controlled Wood materials. 3. After 31 December 2013 and applying worldwide, the production of FSC products containing uncertified and uncontrolled minor components is no longer allowed. 4. After 31 December 2014 and applying worldwide, the sale of FSC products containing uncertified and uncontrolled minor components is no longer allowed.

ADVICE-40-004-10	Access to information required by timber legality legislations
Normative reference	FSC-STD-40-004 V2-1, 1.4 and 2.1.1
Effective date	01 November 2012 Amended 27 February 2013
Background	In early 2012, following a mandate of the FSC Board of Directors, FSC initiated an updating process of its standards to ensure harmonization with the EU Timber Regulation (EUTR) and other timber legality legislations such as the US Lacey Act, FLEGT and the Australian Illegal Logging Prohibition

	Act. This process includes adjustments in the FSC COC requirements to ensure that FSC certified products comply with legally required information regarding species, origin of timber and timber products and compliance with trade and custom laws which include, but may not be restricted to: • Bans, quotas and other restrictions on the export of timber products (e.g. bans on the export of unprocessed logs or rough-sawn lumber) • Requirements for export licences for timber and timber products • Official authorisation that entities exporting timber and timber products may require • Taxes and duties applying to timber product exports
Advice	1. Upon request, FSC certified suppliers shall provide customers with the following information about FSC certified and FSC Controlled Wood timber or timber products subject to compliance with applicable timber legality legislations: a) Common name and/or scientific name of timber species as required by the applicable legislation; NOTE: This requirement takes precedence over Clause 2.1.1 c) of FSC-STD-40-004 V2-1. b) Origin of timber (countries of harvest and where applicable, sub-national regions and concessions of harvest); NOTE: Information on the sub-national regions or concessions of harvest shall be provided where the risk of illegal harvesting between concessions of harvest in a country or sub-national region varies. Any arrangement conferring the right to harvest timber in a defined area shall be considered a concession of harvest. c) Proof of compliance with relevant trade and customs laws. 2. FSC certified suppliers shall provide timely responses to the information requests specified in Clause 1 above. 3. The form and frequency of providing this information may be agreed between FSC certified supplier and customer, as long as the information is accurate and can be correctly associated with each material supplied as FSC certified or FSC Controlled Wood. 4. In case the FSC certified supplier does not possess the requested information specified in Clause 1 above, the request shall be passed on to the upstream FSC certified suppliers, until the requested information can be obtained.

ADVICE-40-004-11	Trade and customs laws
Normative reference	FSC-STD-40-004 V2-1, 1.2
Effective date	27 February 2013.
Background	In early 2012, following a mandate of the FSC Board of Directors, FSC initiated an updating process of its standards to ensure harmonization with the EU Timber Regulation (EUTR) and other timber legality legislations such as the US Lacey Act, FLEGT and the Australian Illegal Logging Prohibition Act. This process includes adjustments in the FSC COC requirements to ensure that FSC certified products comply with applicable trade and custom laws which include, but may not be restricted to: • Bans, quotas and other restrictions on the export of timber products (e.g. bans on the export of unprocessed logs or rough-sawn lumber) • Requirements for export licences for timber and timber products

	• Official authorisation that entities exporting timber and timber products may require • Taxes and duties applying to timber product exports.
Advice	1. FSC certificate holders exporting and/or importing timber or timber products shall have procedures in place to ensure that the commercialization of FSC certified products comply with all applicable trade and custom laws.