EUDR GUIDANCE SERIES:

# CORE FSC CERTIFICATION FOR UPSTREAM OPERATORS

| EUDR requirement | How core FSC certification supports | Suggested tasks including documenting what FSC provides |
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| **Scope & regime checks.** Product in Annex I scope; EUTR/EUDR transition for legacy timber; Article 29 country classification (determines Article 13 simplified due diligence). | Core FSC does not determine EUDR product scope, which regime applies to legacy timber, or a country's Article 29 status. The FSC Product Classification & HS Alignment Guidance helps you classify products. | Confirm scope against Annex I (and the final Delegated Act amending it). Apply EUTR rules to timber produced before 29 June 2023 placed on the market until 31 Dec 2029. Check and monitor Article 29 classification per sourcing country – reclassification changes your obligations from the next placing on the market. |
| **Legality information** – Art. 9(1)(h): adequately conclusive and verifiable information of production in compliance with relevant legislation. | FM: P&C Principle 1 requires verified compliance with applicable law (land use rights, environment, labour, FPIC, anti-corruption, trade/customs); annual third-party audit; public summary report. CoC: FSC-STD-40-004 cl. 6.1 requires conformity with timber legality legislation, verified annually; public certificate database confirms status. May 2026 Guidance: where initial information indicates negligible risk, extensive evidence need not be systematically collected – FSC required evidence may support that initial information; "relevant legislation" narrowed to laws directly linked to halting deforestation/degradation. | Build a per-country register of relevant legislation (use the upcoming Commission repository, Principle 1, FSC-STD-40-004 cl. 6.1 and audit evidence as starting points). Document the reliance: record which FSC output (database entry, audit findings, public summary report, documentation) evidences which law category, when verified, its limitations, and why adequate for Art. 9(1)(h). Retain the FSC evidence itself in your file. |
| **Deforestation-free information** – Art. 9(1)(g), **FSC 100% material.** | P&C 6.9/6.10 prohibit conversion of natural forest/HCV; FSC-POL-01-007 applies the 31 Dec 2020 cut-off; binding ADVICE-20-007-24 bars sale as FSC-certified of products from EUDR-defined conversion; INT-STD-01-004_01/_02/_04/_05 align FSC conversion/degradation definitions with EUDR. | No substantive gap. Document the reliance: map POL-01-007 / ADVICE-20-007-24 and the certificate evidence into your DDSt documentation as the Art. 9(1)(g) basis, cited as evidence in your own conclusion. |
| **Deforestation-free information** – Art. 9(1)(g), **FSC Mix / Controlled Wood portion** | The CW portion is risk-assessed under FSC-STD-40-005 against the applicable FSC risk assessment; assurance is EUDR-aligned only where that assessment has transitioned to FSC-PRO-60-006b (RAF V2.0). FSC-STD-40-005 cl. 1.1 already requires a documented due diligence system for this material. | Check per sourcing country whether the FSC risk assessment is on FSC-PRO-60-006b (FSC Risk Hub) and the material you handling was evaluated under FSC-PRO-60-006b. Where not: supplement with your own screening against FSC-PRO-60-006b indicators 10-12 and 55-57 and document it. Document the reliance: cite the applicable risk assessment version and indicators as the basis for the CW portion in your file. |
| **Deforestation-free information** – Art. 9(1)(g), **FSC Recycled material.** | FSC Recycled has no virgin forest-origin content, so there is no deforestation to assess - but the claim doesn't automatically remove the product from EUDR. EUDR Annex I exempts genuine waste but excludes manufacturing by-products, and FSC's reclaimed definition (FSC-STD-40-004 cl. 2.7) is wider than the EU "waste" definition. Paper and post-consumer wood are generally waste (presumably exempt but verify); pre-consumer wood offcuts are often a by-product (assess against applicable EU legal definitions, EUDR likely applies). | Establish material type, and for wood the post-/pre-consumer split. For pre-consumer wood, either show it is genuine "waste" or apply FSC-STD-40-004 cl. 6.1(d): treat as Controlled Wood (full FSC-STD-40-005 due diligence, incl. Art. 10 and sanctions screening), or notify customers and support their due diligence. Document the reliance: record the classification, its basis, and any cl. 6.1(d) path, dated. |
| **Species, product description, quantity** – Art. 9(1)(a)–(b). | FM: IGI 8.5.3 – sales invoices retained 5 years identify purchaser, date, species (common and scientific name), product description, volume, certificate code, FSC claim. CoC: FSC-STD-40-004 cl. 4.2/5.1 – equivalent material accounting and sales documentation. | Convert quantities to net mass in kilograms plus the supplementary unit where required; add full scientific names where records hold only common names. Reference the FSC record set in your procedure as the source for these fields. |
| **Country of production** – Art. 9(1)(c). | IGI 8.5.2 and FSC-STD-40-004 cl. 2.1 mean the information is compiled/documented internally; some national FSS variants (e.g. Germany) require it in sales documentation. | Confirm the country you record is the country of harvest, not the supplier's country of establishment. Where you lack it, request it under FSC-STD-40-004 cl. 6.1(b) and record an explicit written statement from your supplier. |
| **Geolocation** – Art. 9(1)(d): polygons for plots >4 ha; point for ≤4 ha. | Only a management-unit centroid point is recorded, and it is not systematically passed down the chain of custody. | Obtain plot-level polygon/point data from your upstream FSC supplier; FSC-STD-40-004 cl. 6.1(b) is your contractual mechanism where legislation requires it. National laws prohibiting geolocation sharing are not accepted grounds for non-submission. Enter the data in your DDSt and Article 9 file. |
| **Production date / time range** – Art. 9(1)(d). | FM certificate holders record harvest dates internally (IGI 8.5.2) but are not required to pass them to buyers. | Request the harvest date range explicitly from your supplier for each consignment and include it in your DDSt and Article 9 file. |

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| **Supplier & customer identity** – Art. 9(1)(e)–(f): name, address, email of suppliers and businesses supplied. | FSC-STD-40-004 cl. 2.1 (up-to-date supplier records), 4.2 (input/output accounting) and 5.1 (sales document content) hold most fields, retained 5 years (cl. 1.1e). | Add the missing EUDR fields – email address and registered trade name/trademark – for suppliers and customers, across your full EUDR scope, typically in your ERP/accounting records. |
| **Risk assessment** – Art. 10, against the Art. 10(2) criteria (unless Art. 13 applies). | FSC-STD-40-005 requires a documented due diligence process for CW; FSC-PRO-60-006b provides 64 EUDR-aligned indicators; FSC risk assessments and audit evidence are citable per criterion. Art. 10(2)(n) expressly permits certification as an input – and expressly preserves your responsibility. | Produce your own formal, dated assessment structured against Art. 10(2) – including armed conflict and sanctions screening (UN/EU lists, ACLED/UCDP). Check Art. 13 first for 100% low-risk sourcing. Document the reliance: cite the FSC indicators/assessments used per criterion, with version and date checked. |
| **Risk mitigation** – Art. 11, where risk is more than negligible. | FSC risk assessments under FSC-PRO-60-006b set out control measures per specified-risk indicator; the Risk Mitigation Measures (RMM) database consolidates measures by sourcing area and indicator. | Select, apply and record your own measures before placing on the market: what you did, why adequate and proportionate, and the conclusion reached. The determination is yours – FSC control measures are cited as inputs, not as the decision. |
| **Due diligence system** – Art. 8, 12(1): documented system covering all inputs; annual review (12(2)). | FSC-STD-40-005 cl. 1.1 is itself a documented due diligence system for the CW portion. FSC audits support the verification element. What FSC does not give you is one system spanning your whole EUDR-scope product range. | Build a standalone system around your full EUDR scope: per-country legislation overview, supply-chain overview back to the plot, product/area risk profiles. Name which FSC output feeds which step and what you do where FSC does not reach. Review at least annually and on any change in sourcing, suppliers or country classifications – FSC audit cycles do not discharge this. |
| **EU Information System registration; EORI** – Art. 4(2); non-EU operators. | No core FSC mechanism. | Register once in the EU Information System. Non-EU-based: obtain an EORI number or mandate an EU-established authorised representative – noting responsibility cannot be transferred to the representative. |
| **DDSt submission & customs** – Art. 4(2), Art. 33, Annex II; reference number in import customs declarations. | No core FSC mechanism. (FSC records feed the Annex II content, per the rows above.) | Submit a DDSt per consignment before placing on the market or exporting; quote the reference number in the customs declaration for imports. Keep the DDSt record 5 years from submission. |
| **Pass the reference number downstream** – Art. 4(7), proactive. | FSC transaction documentation does not carry this field by default, but your invoices/delivery notes are an accepted channel. | Consider adding the DDSt reference number to invoices or delivery notes and send it proactively to the first downstream operator/trader you supply - the recipient is not required to request it. Be able to produce it for an inspector. |
| **Record retention** – Art. 4(3): 5 years. | FSC-STD-40-004 cl. 1.1e and IGI 8.5.3 require five-year retention – same duration, different trigger (FSC: from the transaction). | Run two clocks: 5 years from DDSt submission (statement) and 5 years from placing on the market/export (Art. 9 information and supporting documents). Apply the later date where FSC and EUDR clocks diverge. |
| **Notification of non-compliance** – Art. 4(5): inform competent authorities and supplied customers. | FSC integrity systems - suspensions, Policy for Association cases, complaints outcomes - are a route through which such information may reach you. They do not notify authorities for you. | Define who monitors incoming information (including FSC alerts) and who notifies which competent authority and which customers, immediately. Build the route from an FSC alert into your procedure. |
| **Annual public reporting** – Art. 12(3), non-SME only. | No core FSC mechanism. | Publish annually on your due diligence system (Art. 8–12: procedures, information collection, risk assessment, mitigation, review outcome). First reports, covering 2027, due after 30 Dec 2027; CSRD-integrated reporting permitted (EUDR FAQ v5, 9.9). |
| **Cooperation with authority checks** – Art. 18: assistance, documentation, access, samples. | FSC audit records, public summary reports and FSC Search are producible third-party evidence – but only for your certified material. | Identify who receives and answers a competent authority request and be able to produce your full EUDR records – certified and non-certified scope – within the timeframe set. |

**DISCLAIMER**: FSC certification is not a green lane. Responsibility for EUDR compliance always stays with you as the certificate holder. EUDR Article 10(2)(n) permits certification schemes to be used in the risk assessment procedure but preserves your responsibility to exercise due diligence. Everything in the middle column is evidence and infrastructure – to be identified, justified and documented within your own due diligence system and other obligations, never a compliance conclusion in itself. "We are core FSC-certified" is not a due diligence conclusion. This guide is provided for general information purposes and does not constitute legal advice, an authoritative interpretation of the EUDR or a determination of compliance.

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