EUDR GUIDANCE SERIES:

CORE FSC CERTIFICATION FOR MICRO AND SMALL PRIMARY OPERATORS (MSPOS)

EUDR requirement	How core FSC certification supports	Suggested tasks including documenting what FSC provides
Eligibility & regime checks. The four MSPO conditions (natural person, micro- or small undertaking per Directive 2013/34/EU; established in an Article 29 low-risk country; products produced yourself; placed on the market or exported by you); EUTR transition for legacy timber.	Core FSC does not determine your size status, your country's Article 29 classification, or which regime applies to legacy timber.	Confirm all four conditions. Check the business-part relief: a larger company may still qualify where the part of its business relating to relevant commodities falls within the size thresholds (May 2026 Guidance / EUDR FAQ v5). Monitor Article 29 (Implementing Regulation (EU) 2025/1093) – reclassification ends MSPO eligibility and triggers full upstream operator obligations. Timber produced before 29 June 2023 may remain governed by EUTR until 31 Dec 2029.
Substantive due diligence – Art. 4(1), 4a, 13: your declaration confirms deforestation-free (Art. 3(a)) and legal (Art. 3(b)) production.	(FM certificate, P&C V5.2 or later). Principle 1 covers harvesting rights, land tenure and use rights, environmental law, tax and anti-corruption; Principles 2–4 cover labour rights, Indigenous Peoples' rights incl. FPIC, and community rights. Criteria 6.9/6.10 prohibit conversion of natural forest; FSC-POL-01-007 applies the 31 Dec 2020 cut-off. Your annual audit verifies this at management-unit level – the evidence attaches directly to your own plots: no supply chain behind you, no traceability gap. Also applies under smallholder standards for small/low-intensity forests.	Document the reliance: cite your certificate database entry, the audit findings, the public summary report, and other related certification documentation as the third-party evidence behind your declaration – the declaration and its content remain yours.
Location information – Art. 4a: postal address permitted instead of polygon geolocation.	The location identification in your FSC certificate – country, region, centroid coordinates in the public summary report, postal address – may already cover this.	Confirm the postal address you use clearly corresponds to the geographic location of the plots where you produce.
Annex III information set – the content of your simplified declaration, incl. HS code and estimated annual quantity.	IGI 8.5.3 – species (common and scientific name), product description, volume, purchaser identity and date, retained 5 years.	Supply what FSC does not hold: the HS code (classify the product yourself – the FSC Product Classification & HS Alignment Guidance helps) and the estimated annual quantity – a forward projection; base it on your management plan and document the basis.
National database route – Art. 4a(4): no duplication where your data already exists in a national or EU database.	No core FSC mechanism.	Check whether your Member State has submitted your data. If so, the declaration identifier is issued to you directly and registration/submission fall away – confirm it has actually been issued and that you hold it.
EU Information System registration & one-time simplified declaration – Art. 4a; EORI for non-EU MSPOs.	No core FSC mechanism.	Register in the EU Information System and submit one simplified declaration to obtain your identifier (unless issued via Art. 4a(4)). Non-EU-based: obtain an EORI number or mandate an EU-established authorised representative – responsibility for Article 3 compliance stays with you and cannot be transferred to the representative.

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Keep the declaration current – Art. 4a(2).	No core FSC mechanism (your management plan is a useful internal source).	Update the declaration after major changes in production or sourcing (e.g. new plots harvested); submit a new simplified declaration if you start placing products with new HS codes on the market.
Pass on the declaration identifier – Art. 4(7), proactive.	A possible host field. FSC transaction documentation does not carry this field by default, but your invoices/delivery notes are an accepted channel.	Consider adding the identifier to invoices or delivery notes and communicate it proactively to the first downstream operator or trader you supply – the recipient is not required to request it.
Record retention – Art. 4(3), applied to your simplified declaration through the Art. 4a regime.	FM: IGI 8.5.3 requires five-year retention of sales invoices identifying purchaser, date, species, product description, volume, certificate code and FSC claim; your certification's supplier records support the input side. Same duration as EUDR, different trigger – FSC retention runs from the transaction, EUDR from submission or placing on the market.	Run two clocks: 5 years from the date the simplified declaration was submitted through the Information System (or the identifier was issued via Art. 4a(4)) for the declaration record, and 5 years from placing on the market or export for the supporting information and supplier/customer details. Apply the later date where the FSC and EUDR clocks diverge.
Notification of non-compliance – Art. 4(5): inform competent authorities and supplied customers; survives the simplified regime.	FSC integrity mechanisms – Policy for Association cases, suspensions, complaints outcomes – are a route through which information may reach you. They do not notify authorities for you.	Decide who in your organisation monitors incoming information (including FSC alerts) and how the notification to the competent authority and your supplied customers is made, immediately – the duty applies to products already placed on the market.
Cooperation with authority checks – Art. 18: assistance, documentation, access, samples.	Your audit records, the public summary report and FSC Search are producible third-party evidence for your certified production.	Identify who receives and answers a competent authority request and be able to produce your records – declaration, supplier/customer details and the FSC evidence – 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.