EUDR GUIDANCE SERIES:

CORE FSC CERTIFICATION FOR FIRST DOWNSTREAM OPERATORS & TRADERS

EUDR requirement	How core FSC certification supports	Suggested tasks including documenting what FSC provides
Role & status checks. Your direct supplier is the EU-established upstream operator or MSPO who submitted the DDSt/declaration; SME vs non-SME status per Directive 2013/34/EU.	Core FSC does not determine your EUDR role or your size status.	Confirm your position by the DDSt reference number or declaration identifier you receive from your supplier. Confirm size status: non-SME = exceeding at least two of €25m balance sheet total, €50m net turnover, 250 employees – this switches on registration (Art. 5(2)) and verification (Art. 5(6)) below.
Transition-period stock & EUTR legacy.	Core FSC does not establish which products fall into these categories.	For products placed on the EU market before 30 Dec 2026, hold adequately conclusive and verifiable evidence that they were placed before the application date – no reference number is needed for them. Separately, EUTR continues to govern certain legacy timber until 31 Dec 2029.
Reference number capture – Art. 5(3)(a): collect and retain the DDSt reference number or declaration identifier for incoming products.	A possible host field. FSC-STD-40-004 cl. 4.2 input records give you a natural home – you may add the number as one further data field linked to incoming product flows.	Capture and retain the number against incoming flows. The duty is passive: you need not chase suppliers – if you receive nothing you may in good faith presume your supplier is not an upstream operator; only if you know your supplier is an upstream operator who has not shared the number must you refrain from placing the products.
Partner information – Art. 5(3): identity and contact details of your direct suppliers and of the operators/traders you supply.	FSC-STD-40-004 cl. 2.1 (up-to-date supplier records), cl. 4.2 (input/output material accounting) and cl. 5.1 (sales document content) hold most of the field set.	Add the missing EUDR fields – email address and, where available, web address – for suppliers and customers, typically in your ERP/accounting records. Document the reliance: name your FSC record set in your procedure as the source for the remaining fields.
Record retention – Art. 5(4): 5 years.	FSC-STD-40-004 cl. 1.1e requires five-year retention – the same duration.	Note the retention clock runs from the date the products are placed on the market, made available, or exported - not from the transaction date in your FSC records. Apply the later date where FSC and EUDR clocks diverge.
Notification of non-compliance – Art. 5(5), all sizes incl. SMEs: immediately inform competent authorities and your customers, incl. on a substantiated concern.	FSC integrity systems – suspensions, Policy for Association cases, complaints outcomes – are a route through which information may reach you. They do not notify authorities for you.	Define who monitors incoming information (including FSC alerts) and who informs which competent authority and which customers, immediately.
EU Information System registration – Art. 5(2), non-SME only.	No core FSC mechanism.	Register once in the EU Information System. SMEs at this tier do not register.

EUDR requirement	How core FSC certification supports	Suggested tasks including documenting what FSC provides
Verification on substantiated concerns – Art. 5(6), non-SME only: verify that upstream due diligence was carried out.	Circumstantial evidence. Where your supplier is FSC-certified: the public certificate database (real-time validity, scope, suspension/withdrawal status), public summary reports for FM certificates (audit findings and non-conformity closures), and the publicly accessible integrity cases list.	Build the reactive workflow – trigger, steps, and who takes the hold/release decision – using the measures the Commission cites (Guidance 3rd ed.; EUDR FAQ v5, 3.6.2): (1) check the validity of the DDSt reference number or declaration identifier in the Information System; (2) request further information or documentation from your supplier evidencing that due diligence was exercised; (3) consult additional sources, such as the Article 29 country benchmarking and publicly available reports – the FSC public summary reports and integrity cases list fit here. Inform the competent authorities, and do not place, make available or export the product until verification shows no or only negligible risk. Document the reliance: record which FSC sources you check and cite them, dated, in each verification file.
Exports of already-covered products.	No core FSC mechanism.	Use the dedicated TARIC certificate code at customs instead of providing a reference number.
Cooperation with authority checks – Art. 18: assistance, documentation, access, samples.	Your own certificate status in FSC Search and your CoC audit records are producible third-party evidence for certified lines.	Identify who receives and answers a competent authority request and be able to produce your records across your full EUDR 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.