EUDR GUIDANCE SERIES:

ASSESSING FSC AGAINST THE COMMISSION'S CRITERIA

WHY YOU MUST ASSESS THE SCHEME YOURSELF

Companies may use certification or third-party verification schemes for compliance with certain requirements of the Regulation – and the Commission's Guidance Document asks you to perform the assessment of the schemes you rely on. It sets out three elements: (1) the relevant standards – the operating requirements, scope, procedures and policies applying to companies adhering to the scheme; (2) implementation – the extent to which those standards are actually applied, including the measures deployed to ensure compliance, such as audits; and (3) governance features – the credibility of the scheme in terms of transparency, assurance processes and oversight. The Guidance is explicit that this is not a one-time exercise: reassess regularly, particularly against EUDR requirements. You can rely on already-made assessment documents – the Commission's own study, the ASI benchmarking, the future certification schemes repository – as the evidence base, but what you put in front of a competent authority must be your own reasoned, dated conclusion on what FSC verifies, how you established it, and where it feeds your due diligence – not FSC's materials standing alone.

Useful input: the ASI benchmarking assessment of August 2025 (ASI WO-3742), a formal third-party evaluation of FSC against the EUDR Guidance Document criteria. The Commission also plans a public repository of certification schemes for EUDR commodities – monitor it, but it will not replace your own assessment. Treat all of these as evidence supporting your assessment, and record which version you relied on and when you reviewed it.

ELEMENT 1 — DO CORE FSC STANDARDS COVER WHAT EUDR REQUIRES?

Summary answer: substantially with core FSC certification; fully when the Regulatory Module is added (FSC's assessment). The ASI assessment found core FSC certification "fully aligned" or "mostly aligned" with all 21 sub-criteria of the relevant-standards element. Possible elements for your written assessment:

- **Deforestation cut-off and definitions**: P&C Criteria 6.9/6.10 (no conversion of natural forest or HCV areas); FSC-POL-01-007 (conversion after 31 Dec 2020 generally unacceptable – the EUDR cut-off); ADVICE-20-007-24 (binding: products from EUDR-defined conversion may not be sold as FSC-certified); Interpretations INT-STD-01-004_01/_02/_04/_05 (FSC conversion and degradation definitions aligned with EUDR).
- **Legality, risk and supply-chain standards**: P&C Principle 1 (comprehensive legal compliance across the Article 2(40) legislation categories); FSC-PRO-60-006b V2.0 (Risk Assessment Framework, 64 EUDR-aligned indicators); FSC-STD-40-004 V3-1 (Chain of Custody – sourcing, processing, labelling and sale requirements ensuring material originates from well-managed forests and claims are legitimate and accurate); FSC-STD-40-005 V3-1 (Controlled Wood – a due diligence system to evaluate and mitigate risk from non-certified material and exclude unacceptable sources); FSC-STD-30-010 (Controlled Forest Management – legality, customary and human rights, protection of social, cultural, environmental and HCV values, prevention of deforestation and degradation).
- **Public verifiability**: FSC Search – certificate validity, suspension/cancellation dates, and audit reports for FM, CFM and CW.

ELEMENT 2 — DOES FSC ACTUALLY DELIVER WHAT ITS STANDARDS REQUIRE?

Summary answer: FSC considers that this element is addressed through annual third-party audits, a public certificate database, public summary reports for forest management certificates, and a system of corrective actions and suspensions. Possible elements:

- **Auditing and auditor competence**: annual third-party audits of every certificate holder by accredited certification bodies (FSC-STD-20-007 for FM, FSC-STD-20-011 for CoC) – at least once per calendar year, and for CoC no later than 15 months after the last audit. Binding competence requirements (qualification, training, field experience, scheme-specific FM/CoC criteria) make who audits a normative requirement, not the CB's discretion.
- **Independent oversight**: ASI oversight of certification bodies, independent of FSC's certification decisions – accreditation of every CB, office assessments, and field witness audits observing an FSC auditor at work; accreditation can be suspended or withdrawn.
- **Public verification**: the FSC certificate database (real-time validity, scope, suspension and withdrawal status, directly checkable by a customer or competent authority) and public summary reports for all FM and CFM certificates (audit findings, non-conformities and closure status) – publicly accessible third-party evidence.
- **Enforcement and integrity**: corrective actions on binding timelines (minor non-conformities within 12 months; major within 3 months or suspension); trademark protection; and an integrity case mechanism with a public cases list; plus an ASI/CB transaction verification programme for high-risk supply chains – fibre testing, isotope analysis, document-level verification.

ELEMENT 3 — IS FSC ITSELF CREDIBLE AND WELL GOVERNED?

Summary answer: FSC considers that this element is addressed with multi-stakeholder governance, independent oversight by ASI, and external recognition through ISEAL Code compliance and ISO/IEC 17065 accreditation. Possible elements:

- **Multi-stakeholder governance**: a three-chamber General Assembly (environmental, social, economic) with balanced Board representation, and an FSC Code of Conduct and Statutes addressing conflicts of interest at organisational level.
- **Separation of standard-setting from assurance**: standards are developed by FSC; conformity assessment is carried out by accredited certification bodies under ISO/IEC 17065.
- **Independent oversight**: ASI, the global assurance provider for the FSC system, operates under its own public procedures with a public list of sanctioned CBs; its Two-Tier Assurance Program works with national accreditation bodies (e.g. DAkkS, UKAS) under Regulation (EC) 765/2008.
- **Accountability channels**: FSC-PRO-01-008 (Processing Complaints – open to any party, escalating step by step from the actor directly involved) and FSC-POL-01-004 (Policy for Association – disassociation from unacceptable activities including illegal logging and conversion, inside or outside a certified unit, with publicly listed outcomes).
- **External recognition**: FSC is a Code-Compliant member of the ISEAL Alliance, independently evaluated against the ISEAL Code of Good Practice for Sustainability Systems.

DISCLAIMER: FSC certification is not a green lane. Responsibility for EUDR compliance always stays with you as the certificate holder – it is never transferred to FSC and is not discharged by holding a certificate. EUDR Article 10(2)(n) permits certification schemes to be used in the risk assessment procedure but preserves your responsibility to exercise due diligence. Use core FSC certification as evidence within your own assembled due diligence system and other obligations – identified, justified and documented. "We are core FSC-certified" is not a due diligence conclusion.

FSC FORESTS FOR ALL FOREVER™