EUDR GUIDANCE SERIES:

RISK ASSESSMENT FOR THE CONTROLLED WOOD IN FSC MIX PRODUCTS

WHY CONTROLLED WOOD NEEDS ITS OWN TREATMENT

FSC Mix product combines FSC-certified material with other material types including Controlled Wood (controlled material) – non-certified virgin material risk-assessed under FSC-STD-40-005 against the applicable FSC risk assessment for the sourcing country. FSC-STD-40-005 clause 1.1 already requires you to have, implement and maintain a documented due diligence system for that material. Applying the standard correctly, on a properly updated risk-assessment basis, constitutes carrying out due diligence for the Controlled Wood portion. How far that carries you for EUDR depends on which risk-assessment framework your sourcing country is on.

STEP 1: CHECK ARTICLE 13 SIMPLIFIED DUE DILIGENCE FIRST

Before working through the gaps: is 100% of the material – both the FSC-certified and Controlled Wood shares – sourced from countries currently classified low risk under EUDR Article 29 country benchmarking? If yes, complete the complexity/circumvention-risk assessment Article 13(1) itself requires and retain the supporting evidence. If satisfied, Articles 10 and 11 are not required for that product – the gaps below do not need to be closed. Note that the EU's Article 29 classification is a separate system from FSC's own risk assessments, and it is not a one-time check – monitor it. If any part of the material is not ascertained low risk, continue below.

STEP 2: CHECK IF THE FSC RISK ASSESSMENT WAS BUILD ON RAF V2.0

The EUDR-aligned FSC Risk Assessment Framework V2.0 (FSC-PRO-60-006b, 64 indicators, effective 1 July 2024) is progressively replacing risk assessments built on the previous framework (FSC-PRO-60-002a, 57 indicators). Check FSC Risk Hub for the country your Controlled Wood originates from (only transitioned risk assessment are published there). Two temporary gaps exist while a country remains on the old framework:

- Gap 1: deforestation/degradation. The old NRA has no equivalent at all to RAF V2.0 Indicators 55 (no conversion since 31 December 2020) and 57 (no degradation of natural forests since 31 December 2020) and uses a softer percentage-threshold test where Indicator 56 now applies a stricter, zero-tolerance EUDR-aligned check.
- Gap 2: corruption. The old NRA has no equivalent to Indicators 10–12 (corruption and bribery in legal compliance; all forms of bribery avoided; no data or document falsification).

If the country is on RAF V2.0: Gaps CW-1 and CW-2 are presumably closed. Document within your Controlled Wood due diligence file that applying FSC-STD-40-005 with the updated risk assessment constitutes your risk assessment for the Controlled Wood portion.

If not yet updated: decide whether you can wait for an update or must act now. If you must act, build supplementary evidence for Controlled Wood due diligence system: self-assess against Indicators 55-57 using plot-level geolocation and satellite/GIS screening for post-2020 conversion and degradation, and against Indicators 10–12 by screening explicitly for corruption, bribery and data falsification. Document this as the risk-assessment basis for the Controlled Wood portion. See Step 4 for more information.

STEP 3: SCREEN FOR SANCTIONS AND ARMED CONFLICT (BOTH RA VERSIONS)

One universal gap is independent of the framework transition: "violations of international human rights, armed conflict, or presence of UN Security Council / EU sanctions" is an Article 10(2) criterion not explicitly tested by Controlled Wood Indicators at either risk assessment version and not explicitly listed among the laws FSC Principle 1 requires compliance with. Add your own screening step: consult a recognised source (UN Security Council and EU sanctions lists; conflict-monitoring data such as ACLED or the Uppsala Conflict Data Program) for the country/region of harvest. If no indication found, record negligible risk with sources and date checked. If indication is found proceed to mitigation – documented verification of origin, supplier attestation or stakeholder consultation, or sourcing exclusion from the flagged area until risk is confirmed negligible. This applies to the FSC-certified share too, not only the Controlled Wood portion.

STEP 4: ASSESS EACH MISSING INDICATOR (OPTIONAL)

1. **Identify the threshold**. For each relevant indicator (55/56/57; 10/11/12), use the "Indicators & Thresholds" tab of FSC's Risk Assessment Template (or FSC-PRO-60-006b directly) – e.g. Indicator 57: any credible report of forest degradation since 31 December 2020 in the sourcing area.
2. **Set scale and sources**. Geopolitical scale (country, province, concession) and source types – recorded in the "Assessment of Indicators" tab. For 55/57: EU Observatory on Deforestation (EUFO), RADD near-real-time alerts, JRC Tropical Moist Forest and GLAD datasets, WRI Tree Cover Loss by driver. For 10–12: World Bank Worldwide Governance Indicators (named by FSC-PRO-60-006b clause 13.9(b) itself as a reference for a negligible-risk conclusion), Transparency International CPI and related indices – governance data and document review, not satellite monitoring.
3. **Conclude and document**. If credible evidence does not meet the threshold: record the conclusion, descriptions, references and experts consulted, legislation reviewed, and source limitations – per the template's own columns. If it does: move to the Risk Mitigation tab – e.g. satellite/GIS verification of no conversion since the cut-off, cross-checked invoices/permits/transport documents, supplier attestation, third-party audit reports – recording verifier type and associated action (FSC-PRO-60-006b clause 14.4).
4. **File it**. Add each conclusion, with the specific indicator numbers cited, to your Controlled Wood due diligence file – this is your Article 10 risk-assessment record for the product, defensible to a competent authority as your own dated assessment.

DISCLAIMER: 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. It reflects FSC's interpretation of the EUDR and related European Commission guidance and other materials available as of the date of the publication. FSC certification is not a green lane. Responsibility for EUDR compliance always stays with you as the certificate holder. Article 10(2)(n) EUDR permits certification schemes to be used in the risk assessment procedure but expressly preserves your responsibility to exercise due diligence. Everything above describes evidence you assemble and cite within your own Article 10 risk-assessment file and due diligence system – not obligations discharged by holding a certificate.