



FSC REGULATORY MODULE EXPLANATORY MATERIALS



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GUIDE ON COMPARISON OF KEY TERMS BY EUDR AND FSC DEFINITIONS

This document provides a comparison of how some of the key terms and definitions in the Regulation (EU) 2023/1115 on Deforestation-free Products (also referred to in this material as 'the Regulation', 'this Regulation' or "EUDR") are covered in the FSC system. It includes definitions, interpretations, and references to Advice Notes used in FSC and lists clarifying interpretations of how the EUDR terms and definitions are to be understood as part of FSC certification requirements.

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1. COMPARISON OF EUDR AND FSC KEY TERMS AND DEFINITIONS

Table 1: Comparison of key terms and definitions used in Regulation (EU) 2023/1115 and their counterparts in the FSC system

EUDR Terms and Definitions	FSC Terms and Definitions
Agricultural use <p>'agricultural use' means the use of land for the purpose of agriculture, including for agricultural plantations and set-aside agricultural areas, and for rearing livestock.</p>	<p>Term not explicitly defined in the FSC system, but implicit in the FSC definition of 'non-forest land-use' in <u><FSC-STD-60-004 International Generic Indicators Standard></u>.</p> <p>The term has been incorporated in <u><ADVICE-20-007-24 Deforestation-free products from FSC certified management units></u> and the definition adopted.</p>
Deforestation <p>'deforestation' means the conversion of forest to agricultural use, whether human-induced or not.</p>	<p>Term has not been explicitly defined in the FSC forest management requirements. FSC Interpretations #INT-STD-01-004_01 and #INT-STD-01-004_04 provide the clarification and normative connection to the EUDR definition for full alignment.</p> <p>The EUDR definition has been adopted in the <u><FSC-PRO-60-006b FSC Risk Assessment Framework V2-0></u></p>
Deforestation-free <p>'deforestation-free' means:</p> <ol style="list-style-type: none">that the relevant products contain, have been fed with or have been made using, relevant commodities that were produced on land that has not been subject to deforestation after 31 December, 2020; andin the case of relevant products that contain or have been made using wood, that the wood has been harvested from the forest without inducing forest degradation after 31 December, 2020. <p>See definition on deforestation.</p>	<p>Term not explicitly defined in the FSC system. FSC definitions of conversion and degradation together with FSC Interpretations #INT-STD-01-004_01, #INT-STD-01-004_02, #INT-STD-01-004_04 and #INT-STD-01-004_05, and Advice Notes <u><ADVICE-20-007-24 Deforestation-free products from FSC certified management units></u> and <u><ADVICE-20-007-02 Certification of primary forests></u> provide the clarification and normative connection to the EUDR definition for full alignment.</p>
Forest <p>Land spanning more than 0,5 hectares with trees higher than 5 metres and a canopy cover of more than 10 %, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use.</p>	<p>Forest: A tract of land dominated by trees (Source: <u><FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship Standard></u>).</p> <p>FSC Interpretation #INT-STD-01-004_03 provides the clarification and normative connection to the EUDR definition for full alignment.</p>

Forest degradation

‘forest degradation’ means structural changes to forest cover, taking the form of the conversion of:

- a) primary forests or naturally regenerating forests into plantation forests or into other wooded land; or
- b) primary forests into planted forests.

Degradation: Changes within a natural forest or High Conservation Value area that significantly and negatively affect its species composition, structure and/or function, and reduces the ecosystem’s capacity to supply products, support biodiversity and/or deliver ecosystem services.

(Source: <[FSC-POL-01-007 Policy to Address Conversion](#)>)

FSC Interpretations **#INT-STD-01-004_02** and **#INT-STD-01-004_05** and <[ADVICE-20-007-02 Certification of primary forests](#)> provide the clarification and normative connection to the EUDR definition for full alignment.

Geolocation

‘geolocation’ means the geographical location of a plot of land described by means of latitude and longitude coordinates corresponding to at least one latitude and one longitude point and using at least six decimal digits; for plots of land of more than four hectares used for the production of the relevant commodities other than cattle, this shall be provided using polygons with sufficient latitude and longitude points to describe the perimeter of each plot of land.

In the context of <[FSC-STD-01-004 V1-0 FSC Regulatory Module](#)>, ‘geolocation’ as defined in the Regulation (EU) 2023/1115, Article 2 (28) is equivalent to:

Geolocation: The geographical location of a plot of land described by means of latitude and longitude coordinates corresponding to at least one latitude and one longitude point and using at least six decimal digits.

Micro, small and medium-sized enterprises/SMEs

‘micro, small and medium-sized enterprises’ or ‘SMEs’ means micro, small and medium-sized undertakings as defined in Article 3 of Directive 2013/34/EU of the European Parliament and of the Council

SME categories according to [Directive 2013/34/EU of the European Parliament and of the Council](#):

“1. In applying one or more of the options in Article 36, Member States shall define micro-undertakings as undertakings which on their balance sheet dates do not exceed the limits of at least two of the three following criteria:

- a) balance sheet total: EUR 350 000
- b) net turnover: EUR 700 000
- c) average number of employees during the financial year: 10.

2. Small undertakings shall be undertakings which on their balance sheet dates do not

In the context of <[FSC-STD-01-004 V1-0 FSC Regulatory Module](#)>, the term ‘micro, small and medium-sized enterprises (SMEs)’ is understood as defined in the Regulation (EU) 2023/1115, Article 2 (30).

exceed the limits of at least two of the three following criteria:

- a) balance sheet total: EUR 4 000 000;
- b) net turnover: EUR 8 000 000;
- c) average number of employees during the financial year: 50.

Member States may define thresholds exceeding the thresholds in points (a) and (b) of the first subparagraph. However, the thresholds shall not exceed EUR 6 000 000 for the balance sheet total and EUR 12 000 000 for the net turnover.

3. Medium-sized undertakings shall be undertakings which are not micro-undertakings or small undertakings and which on their balance sheet dates do not exceed the limits of at least two of the three following criteria:

- a) balance sheet total: EUR 20 000 000
- b) net turnover: EUR 40 000 000
- c) average number of employees during the financial year: 250.

Naturally regenerating forest

‘naturally regenerating forest’ means forest predominantly composed of trees established through natural regeneration; it includes any of the following:

- a) forests for which it is not possible to distinguish whether planted or naturally regenerated;
- b) forests with a mix of naturally regenerated native tree species and planted or seeded trees, and where the naturally regenerated trees are expected to constitute the major part of the growing stock at stand maturity;
- c) coppice from trees originally established through natural regeneration;
- d) naturally regenerated trees of introduced species.

Natural forest: A forest area with many of the principal characteristics and key elements of native ecosystems, such as complexity, structure and biological diversity, including soil characteristics, flora and fauna, in which all or almost all the trees are native species, not classified as plantations.

(Source: [<FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship>](#))

The forest type and term “Naturally regenerating forest” is not explicitly defined in the FSC system. FSC Interpretations [#INT-STD-01-004_02](#) and [#INT-STD-01-004_05](#) and [<ADVICE-20-007-24 Deforestation-free products from FSC certified management units>](#) provide the clarification and normative connection to the EUDR definition for full alignment.

Negligible risk

‘negligible risk’ means the level of risk that applies to relevant commodities and relevant products, where, on the basis of a full assessment of product-specific and general information, and, where necessary, of the

Low risk: A conclusion, following a risk assessment, that there is negligible risk that material from a specific geographic area originates from unacceptable sources.

(Source: [<FSC-STD-40-005 Requirements for Sourcing Controlled Wood>](#))

application of the appropriate mitigation measures, those commodities or products show no cause for concern as being not in compliance with Article 3, point (a) or (b).

NOTE: FSC is replacing the term 'low risk' (as above) with 'negligible risk' (as below) in its normative framework.

Negligible risk: A conclusion, following a risk assessment, that there is no cause for concern either that material from a specific geographic area originates from unacceptable sources, or that material is mixed with non-eligible inputs or material with a different origin in such a way that would not allow the level of risk related to origin to be confirmed as negligible.

Non-compliant product

'non-compliant products' means relevant products that do not comply with Article 3.

In the context of <[FSC-STD-01-004 V1-0 FSC Regulatory Module](#)>, for products or material which have been identified by a competent authority as 'non-compliant' with the EUDR, FSC requirements for non-conforming products apply.

Non-conforming product: Product or material for which an organization is unable to demonstrate that it conforms to the applicable FSC certification requirements and eligibility requirements for making FSC claims.

(Source: <[FSC-STD-40-004 Chain of Custody Certification](#)>)

Non-negligible risk

No definition is provided by EUDR for this term.

Specified risk: A conclusion, following a risk assessment conducted according to <[FSC-PRO-60-002a FSC National Risk Assessment Framework](#)>, that there is risk which cannot be determined as low that forest products from unacceptable sources may be sourced or enter the supply chain from a specific geographic area. The nature and extent of this risk is specified for the purpose of defining efficient control measures.

(Source: <[FSC-STD-40-005 Requirements for Sourcing Controlled Wood](#)>)

NOTE: FSC is replacing the term 'specified risk' (as above) with 'non-negligible risk' (as below) in its normative framework.

Non-negligible risk: A conclusion, following a risk assessment, that there is cause for concern that material from unacceptable sources may have been sourced or entered the supply chain from a specific geographic area. The nature and extent of this risk is specified for the purpose of defining efficient mitigation measures.

Operator

'operator' means any natural or legal person who, in the course of a commercial

In the context of <[FSC-STD-01-004 V1-0 FSC Regulatory Module](#)>, 'operator' as defined in the Regulation (EU) 2023/1115, Article 2 (15) is equivalent to:

activity, places relevant products on the market or exports them.

Operator: (The) Organization who, in the course of a commercial activity, places relevant products on the EU market or exports them.

Other wooded land

'other wooded land' means land not classified as 'forest' spanning more than 0,5 hectares, with trees higher than 5 metres and a canopy cover of 5 to 10 %, or trees able to reach those thresholds in situ, or with a combined cover of shrubs, bushes and trees above 10 %, excluding land that is predominantly under agricultural or urban land use.

Term not explicitly defined in the FSC system, but implicit in the FSC definition of 'non-forest land-use' in [<FSC-STD-60-004 International Generic Indicators>](#).

The term has been incorporated in [<ADVICE-20-007_24 Deforestation-free products from FSC certified management units>](#) and the definition adopted.

FSC Interpretation **#INT-STD-01-004_07** provides the clarification and normative connection to the EUDR definition for full alignment.

Plantation forest

'plantation forest' means a planted forest that is intensively managed and meets, at planting and stand maturity, all the following criteria: one or two species, even age class, and regular spacing; it includes short rotation plantations for wood, fibre and energy, and excludes forests planted for protection or ecosystem restoration, as well as forests established through planting or seeding, which at stand maturity resemble or will resemble naturally regenerating forests.

Plantation: A forest area established by planting or sowing with using either alien or native species, often with one or few species, regular spacing and even ages, and which lacks most of the principal characteristics and key elements of natural forests.

(Source: [<FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship>](#))

Planted forest

'planted forest' means forest predominantly composed of trees established through planting and/or deliberate seeding, provided that the planted or seeded trees are expected to constitute more than 50 % of the growing stock at maturity; it includes coppice from trees that were originally planted or seeded.

Term not explicitly defined in the FSC system, but implicit in the FSC definition of plantation and natural forest, depending on the intensity of management as well as the different purposes for growth.

The term has been incorporated in [<ADVICE-20-007-02 Certification of primary forests>](#) and the definition adopted. FSC Interpretations **#INT-STD-01-004_02** and **#INT-STD-01-004_06** provide the clarification and normative connection to the EUDR definition for full alignment.

Plot of land

'plot of land' means land within a single real-estate property, as recognised by the law of the country of production, which enjoys sufficiently homogeneous conditions to allow an evaluation of the aggregate level of risk of deforestation and forest degradation

In the context of [<FSC-STD-01-004 V1-0 FSC Regulatory Module>](#), 'plot of land' is understood as defined in the Regulation (EU) 2023/1115, Article 2 (27).

NOTE: a plot of land may be considered equivalent to the management unit (MU) only when the MU consists solely of a single real estate property and enjoys sufficiently homogeneous conditions to allow an evaluation of the

associated with relevant commodities produced on that land.

aggregate level of risk of deforestation and forest degradation.

FSC will use a standard spatial reference system (expected to be WGS84 and the UTM coordinate projection system) to map plots of land and to determine the plot area when reporting due diligence data.

Primary forest

‘primary forest’ means naturally regenerated forest of native tree species, where there are no clearly visible indications of human activities and the ecological processes are not significantly disturbed.

Primary forest: naturally regenerated forest of native tree species, where there are no clearly visible indications of human activities and the ecological processes are not significantly disturbed

(Source: Food and Agriculture Organization of the United Nations (FAO). Terms and Definitions provided under Global Forest Resources Assessment 2025).

Note: Primary forests are home to Indigenous Peoples and local communities and are the basis of their identity, culture, belief system, traditional knowledge, and livelihoods. A forest meeting the primary forest definition above would not be excluded due to the presence of these communities.

(Source: [ADVICE-20-007-02 Primary forests in <FSC-DIR-20-007 FSC Directive on FSC Forest Management Evaluations>](#))

Relevant legislation of the country of production

‘relevant legislation of the country of production’ means the laws applicable in the country of production concerning the legal status of the area of production in terms of:

- a) land use rights;
- b) environmental protection;
- c) forest-related rules, including forest management and biodiversity conservation, where directly related to wood harvesting;
- d) third parties’ rights;
- e) labour rights;
- f) human rights protected under international law;
- g) the principle of free, prior and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples;
- h) tax, anti-corruption, trade and customs regulations.

Term not explicitly defined in the FSC system. FSC Interpretation **#INT-STD-01-004_08** (also published under FSC-STD-40-004 with code INT-STD-40-004_71 and under FSC-STD-40-005 with code INT-STD-40-005_35) provides the clarification and normative connection to the EUDR definition for full alignment.

Relevant products

‘relevant products’ means products listed in Annex I that contain, have been fed with or have been made using relevant commodities;

‘relevant commodities’ means cattle, cocoa, coffee, oil palm, rubber, soya and wood.

Both terms are not explicitly defined in the FSC system, but implicit in the FSC definitions of ‘product group’ and ‘product type’, in <[FSC -STD-40-004 Chain of Custody Certification](#)>.

<[FSC-STD-40-004a FSC Product Classification](#)> has a different scope than the Regulation (EU) 2023/1115. For products in the scope of <[FSC-STD-01-004 FSC Regulatory Module](#)>, please refer to the Annex I of the Regulation.

Risk mitigation measure

No definition is provided by EUDR for this term.

Article 11 (1) provides the following reference to risk mitigation:

Except where a risk assessment carried out in accordance with Article 10 reveals that there is no or only a negligible risk that the relevant products are non-compliant, the operator shall, prior to placing the relevant products on the market or exporting them, adopt risk mitigation procedures and measures that are adequate to achieve no or only a negligible risk.

In the context of <[FSC-STD-01-004 V1-0 FSC Regulatory Module](#)>, the term ‘risk mitigation measure’ as mentioned in the Regulation (EU) 2023/1115, Article 11 (1) is equivalent to:

Mitigation measure: An action that the organization shall take to mitigate the risk of sourcing material from unacceptable sources.

Substantiated concern

‘substantiated concern’ means a duly reasoned claim based on objective and verifiable information regarding non-compliance with this Regulation and which could require the intervention of competent authorities.

In the context of <[FSC-STD-01-004 V1-0 FSC Regulatory Module](#)>, substantiated concern is understood as defined in the Regulation (EU) 2023/1115, Article 2 (31).

Trader

‘trader’ means any person in the supply chain other than the operator who, in the course of a commercial activity, makes relevant products available on the market.

In the context of <[FSC-STD-01-004 V1-0 FSC Regulatory Module](#)>, ‘trader’ is understood as defined in the Regulation (EU) 2023/1115, Article 2 (17). However, in order to avoid confusion with the term ‘trader’ as defined in <[FSC-STD-40-004 Chain of Custody Certification](#)>, FSC uses the term ‘regulatory trader’ in <[FSC-STD-01-004 V1-0 FSC Regulatory Module](#)> when referring to a trader in the meaning of the EUDR.

2. INTERPRETATIONS

Code	INT-STD-01-004_01
Requirement (s)	FSC-POL-01-007 V1-0, Terms and Definitions (conversion) FSC-STD-01-004 V1-0, Clause 1.1.1 a) FSC-STD-01-001 V5-3, Criteria 10.1 and 10.9 FSC-STD-60-004 V2-1, Glossary of Terms (conversion) ADVICE-20-007-24, Clause 1
Publication date	01 July 2024
<p>FSC definition of conversion covers lasting changes of natural forest cover or High Conservation Value areas, induced by human activity. Does FSC address non-human induced deforestation?</p> <p>Yes. Criterion 10.9 in <FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship> requires The Organization to assess risks and implement activities to reduce potential negative impacts from natural hazards.</p> <p>Examples of natural hazards that may induce deforestation include drought, fires, landslides, storms, diseases, etc. The Organization prevents and mitigates risks by, among others, having management plans in place, integrated pest management, monitoring systems, managing forests for resilience, etc., which makes FSC an effective measure to reduce the likelihood and impact of non-human induced deforestation. In addition, Criterion 10.1 of <FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship> requires The Organization to regenerate vegetation cover in a timely fashion, by natural or artificial regeneration methods, to pre-harvesting or more natural conditions after harvest or in accordance with the management plan. However, The Organization is not necessarily obliged to restore values that have been affected by natural disasters or by climate change (see definition of restoration).</p> <p>To address the scenario of non-human induced deforestation <ADVICE-20-007-24 Deforestation-free products from FSC certified management units> prohibits the sale of forest products resulting from conversion of natural forests or lasting transformation of plantations into agricultural use that is not human induced (e.g., following a natural disaster) as FSC certified.</p>	

Code	INT-STD-01-004_02
Requirement (s)	FSC-POL-01-007 V1-0, Terms and Definitions (degradation) FSC-STD-01-001 V5-3, Criteria 6.9 and 10.1 FSC-STD-01-004 V1-0, Terms and Definitions (degradation) FSC-STD-60-004 V2-1, Glossary of Terms (degradation) ADVICE-20-007-02 V1-0, Clauses 1 and 2 ADVICE-20-007-24 V1-0, Clause 3
Publication date	01 July 2024
<p>EUDR defines 'forest degradation' as: structural changes to forest cover, taking the form of the conversion of:</p> <p>a) primary forests or naturally regenerating forests into plantation forests or into other wooded land; or</p> <p>b) primary forests into planted forests.</p>	

This definition is different from the FSC definition on degradation. Does wood sourced from an FSC certified management unit meet the requirements of being produced without inducing forest degradation as per the EUDR definition?

Yes. Despite the fact that FSC and the EUDR have adopted different definitions for the term degradation, FSC ensures that wood sourced from an FSC certified management unit do not induce forest degradation after 31 December 2020 as required by the EUDR.

Background:

Based on the EUDR definition of degradation, wood that has been harvested from the forest inducing any of the following five conversion scenarios is prohibited:

- 1) Conversion of primary forests into plantation forests,
- 2) Conversion of primary forests into other wooded land,
- 3) Conversion of naturally regenerating forests into plantation forests,
- 4) Conversion of naturally regenerating forests into other wooded land,
- 5) Conversion of primary forests into planted forests.

NOTE: In the context of this interpretation, the term conversion in the above scenarios is per the EUDR definition.

For scenarios 1), 2) and 5):

ADVISE-20-007-02 Certification of primary forests under <FSC-DIR-20-007 FSC Directive on FSC Forest Management Evaluations> states that primary forest may be certified within the FSC system when its management is in conformity with the requirements of the applicable Forest Stewardship Standard.

The definition of primary forests is covered by the FSC definition of natural forests, thus Criterion 6.9 of <FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship> covers primary forests, regulating the conversion of primary forests to plantation forests and to other wooded land.

The definition of conversion includes also gradual forest degradation, i.e., changes significantly and negatively affecting its species composition, structure and/or function, and reducing the ecosystem's capacity to supply products, support biodiversity and/or deliver ecosystem services.

<ADVISE-20-007-02 Certification of primary forests> has been revised to clarify how FSC requirements prevent the change of primary forests to planted forests.

For scenarios 3) and 4):

In the FSC system, the characteristics a) to c) of the term "naturally regenerating forest" are covered by the FSC term and definition of "natural forests". Criterion 6.9 of <FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship> regulates the conversion of natural forests to plantations or to non-forest land-use.

The EUDR term "other wooded land" largely corresponds to the FSC term and definition on "non-forest land use", which is, however, broader as it does not exclude land that is predominantly under agricultural or urban land use.

The characteristic d) (naturally regenerated trees of introduced species), however, is not covered by the FSC term and definition of "natural forests" as it refers to a forest area in which all or almost all the trees are native species. See under section "Naturally regenerating forest" how FSC Interpretation **#INT-STD-01-004_05** and <ADVISE-20-007-24 Deforestation-free products from FSC certified management units> address these specific conversion scenarios.

Code	INT-STD-01-004_03
Requirement (s)	FSC-STD-01-001 V5-3, Glossary of Terms (forest) FSC-STD-01-004 V1-0, Terms and Definitions (forest)
Publication date	01 July 2024
<p>FSC defines ‘forest’ as a tract of land dominated by trees. Is this aligned with the definition of forest by EUDR?</p> <p>Yes, FSC does not specify minimum thresholds in terms of area or tree height in its forest definition. Regarding canopy cover, the FSC definitions of ‘natural forest’ and ‘plantation’ specify that it includes a range of forest types, from woodlands and savannas to boreal, temperate and tropical primary forests, some of them with canopies characterized by canopy covers starting at 10%.</p>	

Code	INT-STD-01-004_04
Requirement (s)	FSC-STD-01-004 V1-0, Clause 1.1.1 a) ADVICE-20-007_24 V1-0, Clauses 1 to 5
Publication date	01 July 2024
<p>In Regulation (EU) 2023/1115, ‘deforestation-free’ is defined as:</p> <p>a) that the relevant products contain, have been fed with or have been made using, relevant commodities that were produced on land that has not been subject to deforestation after 31 December 2020; and</p> <p>b) in the case of relevant products that contain or have been made using wood, that the wood has been harvested from the forest without inducing forest degradation after 31 December 2020.</p> <p>Do forest products sourced from an FSC certified management unit meet the criteria to be considered 'deforestation-free' as defined by the Regulation?</p> <p>Yes, with the enforcement of <ADVICE-20-007-24 Deforestation-free products from FSC certified management units>, forest products originating from an FSC-certified management unit and sold with an FSC claim can be considered 'deforestation-free' as defined by the Regulation.</p>	

Code	INT-STD-01-004_05
Requirement (s)	FSC-STD-01-004 V1-0, Clause 1.1.1 a) FSC-STD-01-001 V5-3, Criterion 6.9 ADVICE-20-007-24 V1-0, Clause 3
Publication date	01 July 2024

How does FSC address conversion of naturally regenerating forests into plantation forests or into other wooded land?

The characteristics of a ‘naturally regenerating forest’ according to EUDR are:

- a) forests for which it is not possible to distinguish whether planted or naturally regenerated;
- b) forests with a mix of naturally regenerated native tree species and planted or seeded trees, and where the naturally regenerated trees are expected to constitute the major part of the growing stock at stand maturity;
- c) coppice from trees originally established through natural regeneration;
- d) naturally regenerated trees of introduced species.

Characteristics a) to c) fall within the scope of the FSC definition of “natural forests” and their conversion is regulated by Criterion 6.9 of <[FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship](#)>.

The conversion scenarios related to characteristic d), naturally regenerating forests composed predominantly of trees of introduced species, are addressed by <[ADVICE-20-007-24 Deforestation-free products from FSC certified management units](#)>. It also provides an explanatory note why the removal of invasive species and potential subsequent planting of other, non-invasive species in the interest of protection or ecosystem restoration is not considered conversion under the respective clause in the advice note.

Code	INT-STD-01-004_06
Requirement (s)	FSC-STD-01-004 V1-0, Clause 1.1.1 a) ADVICE-20-007-02 V1-0, Terms and definitions (planted forest) ADVICE-20-007-02 V1-0, Clauses 1 and 2
Publication date	01 July 2024

In EUDR, ‘planted forest’ means forest predominantly composed of trees established through planting and/or deliberate seeding, provided that the planted or seeded trees are expected to constitute more than 50% of the growing stock at maturity; it includes coppice from trees that were originally planted or seeded.

Does FSC use the term ‘planted forest’ and how is ‘planted forest’ defined in the FSC system?

Depending on the intensity of management as well as the different purposes for growth, the EUDR definition for ‘planted forest’ (adopted from FAO (2023)) overlaps with FSC definitions of plantation and natural forest.

According to FAO’s explanation of the definition, ‘planted forests’ can resemble natural ecological processes to a greater or lesser extent. There is a trend towards referring to ‘planted forest’ of exotic species as ‘plantation forests’ (with single or few species, even age class, uniform planting density), which would be equivalent with the FSC definition of ‘plantation’.

Meanwhile, ‘planted forests’ of native species are forms of ‘semi-natural forests’ or ‘modified natural forests’ (depending on degree of naturalness, including mixed species and age classes and variable planting density), which would be equivalent with the FSC definition of ‘natural forest’.

Therefore, ‘planted forest’ can be considered belonging to the ‘natural forest’ definition, as long as the forest does not meet the FSC definition of ‘plantation’.

In the context of EUDR, the term ‘planted forest’ is of relevance under the scenario of ‘forest degradation’ that addresses conversion of primary forests into planted forests.

FSC has introduced the term 'planted forest' in <[ADVICE-20-007-02 Certification of primary forests](#)> to ensure alignment between EUDR and FSC requirements regarding the conversion of primary forest to planted forests.

Code	INT-STD-01-004_07
Requirement (s)	FSC-STD-01-004 V1-0, Clause 1.1.1 a) FSC-STD-60-004 V2-1, Glossary of Terms (non-forest land-use) ADVICE-20-007-24 V1-0, Terms and definitions (other wooded land)
Publication date	01 July 2024
<p>Does FSC use the term 'other wooded land' and is there a term comparable to this definition in the FSC system?</p> <p>FSC has introduced the term in <ADVICE-20-007_24 Deforestation-free products from FSC certified management units> to ensure alignment between EUDR and FSC requirements regarding the conversion scenario of 'naturally regenerating forests' to 'other wooded land'.</p> <p>The FSC term, however, is wider as it refers to any land not classified as forest, while the EUDR term excludes land that is predominantly under agricultural or urban land use.</p>	

Code	INT-STD-01-004_08 (also published under FSC-STD-40-004 with code INT-STD-40-004_71 and under FSC-STD-40-005 with code INT-STD-40-005_35)
Requirement (s)	FSC-STD-01-004 V1-0, Terms and Definition, Clause 1.1.1b) FSC-STD-01-001 V5-3, Criterion 1.5 FSC-STD-60-004 V2-1, Annex A
Publication date	01 July 2024
<p>Is compliance with the relevant legislation of the country of production as per EUDR covered by FSC requirements?</p> <p>Yes, for forest management certification, Principle 1 of the <FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship> requires The Organization to comply with all applicable laws, regulations and nationally-ratified international treaties, conventions and agreements. The requirement for Free, Prior and Informed Consent for Indigenous Peoples is covered by Principle 3.</p> <p>Further details on the minimum list of applicable laws, regulations and nationally-ratified international treaties, conventions and agreements that Standard Developers have to include in the Forest Stewardship Standard is reflected in Annex A of <FSC-STD-60-004 International Generic Indicators>.</p> <p>For Chain of Custody, as per Clause 6.1 of the <FSC-STD-40-004 Chain of Custody Certification>, "the organization shall ensure that its FSC-certified and controlled wood products or timber products conform to all applicable timber legality legislation." It also further elaborates that trade and customs laws include: "bans, quotas and other restrictions on the export of timber products (e.g., bans on the export of unprocessed logs or rough-sawn lumber), requirements for export licences for timber and timber products, official authorisation that entities exporting timber and timber products may require and taxes and duties applying to timber product exports."</p> <p>For sourcing material without an FSC claim to be used as controlled material, the risk assessment indicators as per FSC-PRO-60-006b, as well as Annex A, Clause 3.6 of the <FSC-STD-40-005></p>	

Requirements for sourcing FSC Controlled Wood requires the organizations to use the minimum list of applicable laws, regulations, nationally ratified international treaties, conventions, and agreements.



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