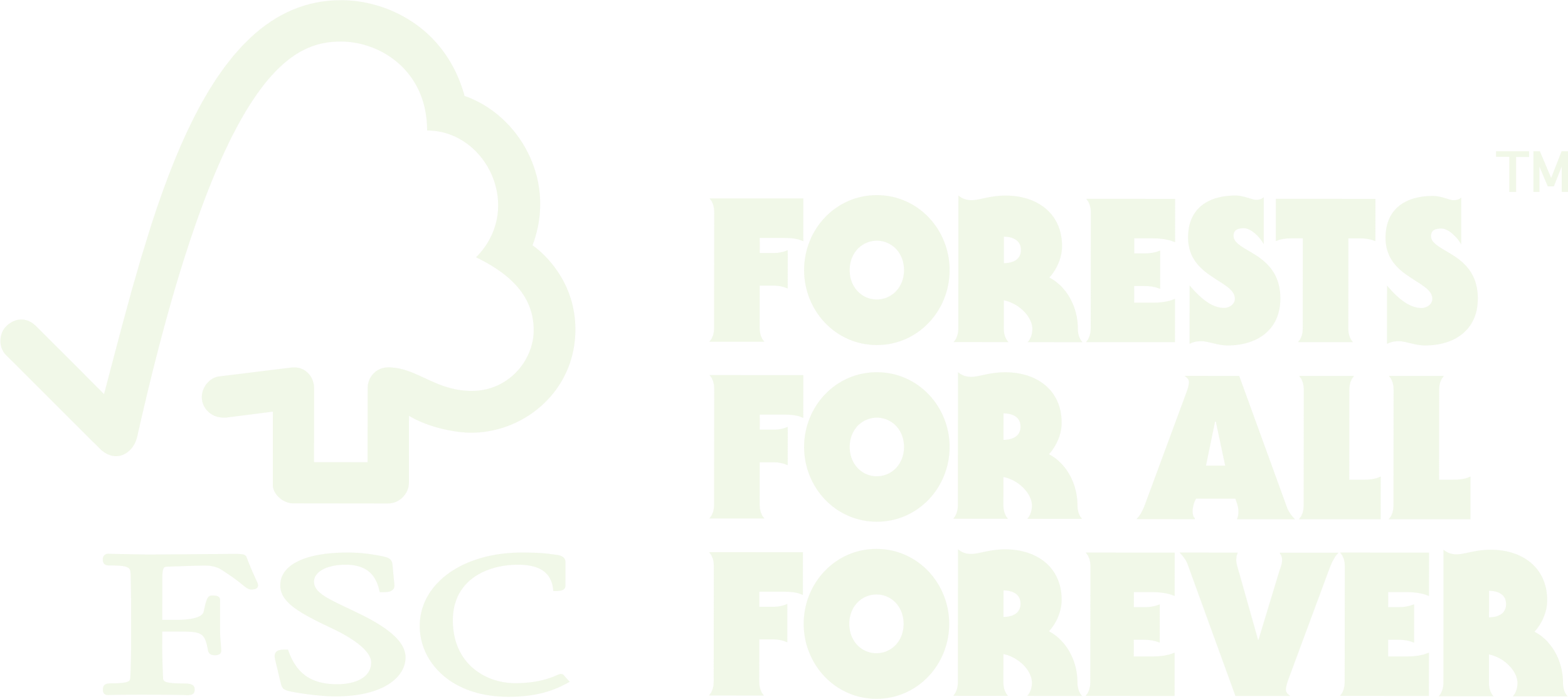


advice notes  
建议说明

Public consultation: 01 February – 01 March 2024  
公开意见征询：2024年2月1日至3月1日



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1. Introduction介绍

The purpose of this document is to provide an overview on public consultation materials. Please provide your feedback through the FSC online public consultation platform.

本文件旨在概述公开意见征询材料。请通过FSC在线公开意见征询平台提供您的反馈。

## Welcome to the public consultation on four FSC Advice Notes FM, CoC and CW)

## 欢迎参加关于四项FSC建议说明的公开意见征询（FM、CoC和CW）

### Why have the Advice Notes been developed?

### 为什么要制定建议说明？

FSC is accelerating changes already planned based on alignment with the Policy to Address Conversion. Recent regulatory (European Union Deforestation Regulation – EUDR) together with approval of the Policy to Address Conversion, provide us an opportunity to simultaneously align our system to strengthen the promise behind the FSC label and tighten the deforestation free status of all FSC certified products, in line with our mission. As directed by the Policy to Address Conversion and the envisaged continued and enhanced alignment with global commitments to end deforestation, FSC is now putting in place strict rules that prevent any material stemming from conversion activities to end up in FSC certified products. The Advice Notes consulted are part of this consolidated effort.

FSC正在加快根据政策调整已经计划的变革，以解决转换问题。最近的法规（《欧盟零毁林法案》（EUDR）以及处理转换的政策获得批准，为我们提供了一个机会，同时调整我们的系统以加强FSC标签背后的承诺，并根据我们的使命加强所有FSC认证产品的零毁林状态。根据解决转换问题的政策以及与全球终止毁林承诺保持和加强一致的设想，FSC正在制定严格的规则，以防止转换活动产生的任何材料最终成为FSC认证产品。征询的建议说明是这一综合努力的一部分。

**The list of Advice Notes in consultation:**

**征询中的建议说明列表:**

1. ADVICE-20-007-xx Deforestation-free products from FSC certified management units

1. ADVICE -20-007-xx来自FSC认证经营单位的零毁林产品

2. ADVICE-20-007-02 Certification of primary forests

2. ADVICE -20-007-02原始森林认证

3. ADVICE-40-004-XX Inclusion of the Regulatory Claim

3. ADVICE -40-004-XX纳入法规声明

4. ADVICE-40-005-27 Addressing systemic changes into requirements for sourcing FSC Controlled Wood

4. ADVICE-40-005-27解决采购FSC受控木材要求的系统性变化

### Who is the consultation for?

### 征询对象是谁？

This consultation is open for all interested stakeholders.

本次征询对所有感兴趣的利益相关方开放。

### Is this consultation related to the other consultations opened at the same time (FSC Regulatory Module and FSC Risk Assessments)?

### 该征询是否与同时开启的其他征询相关（FSC法规模块和FSC风险评估）？

FSC has three related consultations open simultaneously between 1 Feb and 1 March 2024.

2024年2月1日至3月1日期间，FSC将同时举行三场相关征询。

1) A consultation on FSC Regulatory Module.

1）关于FSC法规模块的征询。

2) A consultation on four Advice Notes on changes that are proposed for all certificate holders.

2）就针对所有证书持有者的四项变更建议说明进行征询。

3) A consultation on Risk Assessments related to users of controlled wood and/or FSC Regulatory Module.

3）与受控木材和/或FSC法规模块用户相关的风险评估征询。

Stakeholders interested in the full scope of FSC alignment with the EUDR, including both system wide changes and the voluntary module, are invited to respond to all three consultations. Stakeholders interested in changes proposed to general certification requirements, are invited to respond to consultations 2 and 3.

邀请对FSC与EUDR（包括全系统变化和自愿模块）感兴趣的利益相关方对所有三次征询做出回应。邀请对一般认证要求的拟议变更感兴趣的利益相关方对征询2和3做出回应。

### How to participate in the consultation?

### 如何参与征询？

It is not required to respond to all the questions included in this consultation. You can respond to the questions of the sections that are most relevant to your knowledge, experience or interest.

不需要回答本次征询中包含的所有问题。您可以回答与您的知识、经验或兴趣最相关的部分的问题。

**Opening date:** **01 February 2024**

**开始日期:** **2024年2月1日**

**Closing date:** **01 March 2024**

**截止日期:** **2024年3月1日**

### Consultation materials:

### 征询材料:

ADVICE-20-007-02 Primary Forests

ADVICE-40-004-XX\_EN\_Inclusion of Regulatory Claim

FSC-ADV-20-007-xx\_EN\_AN

1. Participant information参与信息

Please help us understand more about your background and interests by answering the following questions.

请回答以下问题，帮助我们更好地了解您的背景和兴趣。

**General**

**一般**

**Please select the option(s) that you identify with to help us understand more about your background and interests:**

**请选择您的身份，以帮助我们更好地了解您的背景和兴趣:**

* Certificate holder
* 证书持有者
* Environmental NGO
* 环保非政府组织
* Social NGO
* 社会非政府组织
* Certification Body
* 认证机构
* Competent Authority
* 主管当局
* Industry representative
* 行业代表
* Government
* 政府
* Consultant
* 顾问
* Promotional license holder
* 宣传许可持有者
* Assurance Services International (ASI)
* 国际认可服务机构
* FSC Network
* FSC网络
* FSC International staff member
* FSC国际工作人员
* Other
* 其他

If you selected ‘Other’, please specify:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

如果您选择了“其他”，请具体说明:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Are you an FSC member?**

**您是FSC会员吗？**

* Yes
* 是
* No
* 否

**If yes, please specify your membership chamber and sub-chamber.**

**如果是，请具体说明您的会员分会。**

* Social North
* 北方社会
* Social South
* 南方社会
* Environmental North
* 北方环境
* Environmental South
* 南方环境
* Economic North
* 北方经济
* Economic South
* 南方经济

**If you are an FSC Certificate Holder, please select the type(s) of your certification:**

**如果您是FSC证书持有者，请选择您的证书类型:**

* FM
* 森林经营
* FM/CoC
* FM/CoC
* 森林经营/产销监管链经营
* CoC
* 产销监管链经营
* Project certification
* 项目认证

**Do you give your consent for being contacted by FSC via email?**

**您同意FSC通过电子邮件联系您吗？**

* Yes
* 是
* No
* 不

**Do you give your consent to share your contact details with other FSC stakeholders to connect you for working together on this subject matter?**

**您是否同意与其他FSC利益相关方分享您的联系方式，以便就此事进行合作？**

* Yes
* 是
* No
* 不

**If your responded yes to any of the above, please provide your email address:**

**如果您对上述任何一项回答为“是”，请提供您的电子邮件地址:**

**EUDR connection**

**EUDR关联**

**How familiar are you with the EU Deforestation Regulation (EUDR)?**

**您对EUDR有多熟悉？**

5 (very familiar) to 1(not at all):

5分（非常熟悉）到1分（完全不熟悉）:

* 5
* 4
* 3
* 2
* 1

**How relevant is the EU Deforestation Regulation (EUDR) for you or your organization?**

**EUDR与您或您的组织有多大关系？**

5 (very relevant) to 1(not at all relevant):

5（非常相关）到1（完全不相关）:

* 5
* 4
* 3
* 2
* 1

**For CoC certificate holders: Which control systems you are using currently:**

**对于CoC证书持有者:您目前正在使用哪些控制系统:**

(Choose all that apply)

(选择所有适用的选项)

* Transfer
* 转移
* Percentage
* 百分率
* Credit
* 信用

1. Consultation Topics征询主题

## ADVICE-20-007-xx Deforestation-free products from FSC certified management units

## ADVICE-20-007-xx来自FSC认证经营单位的零毁林产品

With the approval of <FSC-POL-01-007 Policy to Address Conversion>, FSC reaffirmed its commitment to contribute to global initiatives aimed to end deforestation and to promote conservation, restoration and restitution.

随着《FSC-POL-01-007》的批准，FSC重申其致力于为旨在终止毁林和促进保护、恢复和复原的全球倡议做出贡献。

FSC forest products sourced from an FSC certified management unit generally meet or exceed regulations for deforestation-free products.

来自FSC认证经营单位的FSC森林产品通常符合或超过零毁林产品的规定。

Specifically, FSC surpasses the European Union Deforestation Regulation (EUDR) by explicitly prohibiting conversion to any non-forest land use, extending beyond restrictions solely to agriculture, and includes stricter requirements addressing degradation.

具体而言，FSC超越了EUDR，明确禁止将土地改作任何非林地用途，不仅仅限于农业限制，还包括更严格的应对退化的要求。

FSC has developed this advice note to align with the intention of the Policy to Address Conversion and close potential gaps between FSC Forest Management requirements and the EUDR, and with this to ensure that all forest products sourced from FSC certified management units are deforestation-free.

FSC制定了本建议说明，以符合政策意图，解决FSC森林经营要求和EUDR之间的转换和弥合潜在差距，并以此确保来自FSC认证经营单位的所有森林产品不砍伐森林。

NOTE: The Policy and Standards Committee has requested the Secretariat to develop an interpretation regarding the definition of conservation and social benefits mean in the context of minimal conversion.

注:政策和标准委员会已要求秘书处就最低限度转换背景下的保护和社会效益含义制定一项解释。

**Questions for feedback (for all stakeholders):**

**反馈问题（针对所有利益相关方）:**

**How much do you agree that forest products sourced from FSC certified management units should be made deforestation-free, as achieved with the introduction of this advice note?**

**您在多大程度上同意来自FSC认证经营单位的森林产品应不砍伐森林，正如本建议说明所实现的那样？**

5 (fully agree) - 1(fully disagree)

5（完全同意）- 1（完全不同意）

* 5
* 4
* 3
* 2
* 1

**If you are an FM/CoC certificate holder: how significant is the impact of a prohibition of selling products originated from minimal conversion as FSC certified for your operations?**

**如果您是FM/CoC证书持有者:禁止销售FSC认证的最小转换产品对您的业务有多大影响？**

5 (very significant) - 1(not at all significant)

5（非常显著）- 1（根本不显著）

* 5
* 4
* 3
* 2
* 1

Please explain your response, if possible, including details regarding the volume of material that would not be possible to sell as FSC certified.

如果可能的话，请解释您的回答，包括无法作为FSC认证产品销售的材料数量的详细信息。

**If you are an FM/CoC certificate holder, how significant is the impact of a prohibition of selling products originated from the transformation of plantations on sites not directly converted from natural forest to agricultural use as FSC certified?**

**如果您是FM/CoC证书持有者，禁止在FSC认证的非直接从天然林转为农业用地的地点销售源于种植园改造的产品的影响有多大？**

5 (very significant) - 1(not significant):

5（非常显著）- 1（不显著）:

* 5
* 4
* 3
* 2
* 1

Please explain your response

请解释您的回答

**The EUDR only prohibits products when conversion to agricultural land is concerned. Do you think that FSC should prohibit the sale of products as FSC certified only when the transformation leads to agriculture, or should it apply also when the transformation leads to a different use such as mining, infrastructure, etc?**

**EUDR仅禁止与农业用地转换相关的产品。您认为FSC应该只在产品转化为农业产品时禁止销售FSC认证的产品，还是应该在产品转化为不同用途（如采矿、基础设施等）时也适用？**

* Any land use
* 任何土地使用
* Only agricultural use
* 仅农业用途
* Other
* 其他的

Please explain your response

请解释您的回答

**The advice note implies the withdrawal of:**

**通知意味着撤销:**

1. **ADVICE-20-007-09 Clearance of encroaching forest,**

**ADVICE-20-007-09清除侵蚀的森林，**

1. **ADVICE-20-007-10 Conversion of plantation to non-forest land and**

**ADVICE-20-007-10将种植园转为非林地和**

1. **ADVICE-20-007-11 Products of land clearance**

**ADVICE-20-007-11土地清理产品**

**that allow the see of products resulting from clearance and minimal conversion as FSC certified.**

**允许通过FSC认证的清关和最小转换的产品。**

How much do you agree with the proposal to withdraw these advice notes?

您有多同意撤回这些建议说明的提议？

5 (fully agree) - 1(fully disagree):

5（完全同意）- 1（完全不同意）:

* 5
* 4
* 3
* 2
* 1

Please explain your response

请解释您的回答

**Please provide any other comment you may have on this advice note**

**请提供您对此建议说明的任何其他意见**

## ADVICE-20-007-02 Certification of primary forests

## 建议-20-007-02原始森林认证

ADVICE-20-007-02 has been revised to align the definition of primary forest with the FAO definition and make explicit that degradation of primary forests constitutes a conversion activity and is therefore prohibited by Criterion 6.9.

对ADVICE-20-007-02号进行了修订，以使原始森林的定义与粮农组织的定义保持一致，并明确指出原始森林的退化构成一种转化活动，因此受到标准6.9的禁止。

**How would you rate the clarity of this advice note?**

**您如何评价此建议说明的清晰度？**

5 (very clear) - 1(very unclear):

5（非常清楚）- 1（非常不清楚）:

* 5
* 4
* 3
* 2
* 1

Please explain your response.

请解释您的回答。

Please provide any other comment you may have on this advice note

请提供您对此建议说明的任何其他意见

## ADVICE-40-004-XX Inclusion of the FSC Regulatory Claim

## 建议-40-004-XX纳入FSC法规声明

The FSC Regulatory Module introduces a new claim (i.e., ‘Regulatory’) into the FSC system to be used in combination with the FSC claims, so that the material or products can be properly identified throughout the supply chain. An organization not applying the Module currently does not have a normative reference or framework on how to deal with this new claim. Furthermore, the organization could even meet its clients demands, if specific risk of mixing requirements are implemented, and pass on the claim itself.

FSC法规模块在FSC系统中引入了一个新的声明（即“法规”），与FSC声明结合使用，以便在整个供应链中正确识别物料或产品。一个不适用该模块的组织目前没有关于如何处理这一新声明的规范性参考或框架。此外，如果实施了特定的混合风险要求，该组织甚至可以满足其客户的要求，并转嫁声明本身。

NOTE: if you would be interested in understanding how FSC chain of custody currently addresses a similar case regarding material ‘From small or community forest producers’, please refer to Clauses 5.5 and 12.3 of <FSC-STD-40-004 Chain of Custody Certification>.

注:如果您有兴趣了解FSC产销监管链目前如何处理有关“小型或社区森林生产者”材料的类似案例，请参考《FSC-STD-40-004》第5.5条和第12.3条。

**How would you rate the clarity of this advice note?**

**您如何评价此建议说明的清晰度？**

5 (very clear) - 1(very unclear):

5（非常清楚）- 1（非常不清楚）:

* 5
* 4
* 3
* 2
* 1

**2.Which Sections would benefit from further additional clarification?**

**哪些部分将受益于进一步的补充说明？**

*Choose all that apply*

*选择所有适用的选项*

* Establishmentof the Regulatory product groups
* **建立法规产品组**
* Material sourcing
* 材料采购
* Material handling
* 物料输送
* FSC material and product records
* FSC材料和产品记录
* Sales
* 销售
* Other (not covered by the current draft)
* 其他（当前草案未涵盖）
* No changes are required
* 不需要任何更改

Please provide your rationale and suggestions for improvement.

请提供您的理由和改进建议。

**3. If you are a CoC certificate holder, at this time, how significant is the impact of this advice note for your operations?**

**如果您是CoC证书持有者，此时该建议说明对您的运营有多大影响？**

*5 (very significant) - 1(not at all significant)*

*5（非常显著）- 1（根本不显著）*

Please provide your rationale for response to Q4.

请提供您对问题3做出回应的理由。

**4. Overall, to what extent do you agree with this advice note**

**总体而言，您在多大程度上同意这份建议说明**

*5 (fully agree) – 1 (fully disagree)*

*5（完全同意）–1（完全不同意）*

**5. Please share any additional comments you may have on the draft advice note.**

**请分享您对建议说明草稿的任何其他意见。**

## ADVICE-40-005-27 Use of FSC-PRO-60-006b Risk Assessment Framework

## 建议-40-005-27使用FSC PRO-60-006 b风险评估框架

The advice note highlights changes that allows users to use <FSC-PRO-60-006b Risk Assessment Framework> for conducting risk assessment and determining risk designations at each indicator level.

该建议说明强调了允许用户使用《FSC-PRO-60-006b风险评估框架》进行风险评估并确定每个指标级别的风险指定的变化。

**Questions for feedback (for all stakeholders):**

**反馈问题（针对所有利益相关方）:**

**How would you rate the clarity of this advice note?**

**您如何评价此建议说明的清晰度？**

5 (very clear) - 1(very unclear):

5（非常清楚）- 1（非常不清楚）:

* 5
* 4
* 3
* 2
* 1

Please provide the rationale behind your response.

请提供您回复的理由。

**As a certificate holder with <FSC-STD-40-005 Requirements for Sourcing FSC Controlled Wood> under scope, how significant is the impact of this advice note in your risk assessment?**

**作为《FSC-STD-40-005》范围内的证书持有者，此建议说明在您的风险评估中的影响有多大？**

5 (very significant) - 1(not at all significant)

5（非常显著）- 1（根本不显著）

* 5
* 4
* 3
* 2
* 1

Please provide rationale behind your response, if possible, including details about the type of impact.

如果可能的话，请提供您回答的理由，包括影响类型的详细信息。

**As a certificate holder, how significant is the impact do you think on the supply of FSC Controlled Wood?**

**作为证书持有者，您认为这对FSC受控木材的供应有多大影响？**

5 (very significant) - 1(not at all significant):

5（非常显著）- 1（根本不显著）:

* 5
* 4
* 3
* 2
* 1

Please provide the rationale behind your response.

请提供您回复的理由。

**A certificate holder can start applying this advice note from 01 July 2024. After a transition period of 18 months, all certificate holders shall be conformant with this advice note. How much do you agree with this transition plan to bring all certificate holders in conformance?**

**证书持有者可从2024年7月1日起开始适用本通知。经过18个月的过渡期后，所有证书持有者应遵守本通知。您在多大程度上同意这一旨在让所有证书持有者都达标的过渡计划？**

5 (fully agree) - 1(fully disagree):

5（完全同意）- 1（完全不同意）:

* 5
* 4
* 3
* 2
* 1

Please provide the rationale behind your response.

**请提供您回复的理由。**

**Please provide any other comment you may have on this advice note.**

**请提供您对此建议说明的任何其他意见。**

THANK YOU谢谢

**Thank you for your time and contributions!**

**感谢您的时间和贡献！**

On behalf of FSC, thank you very much for your participation in this consultation.

我代表FSC非常感谢您参加这次征询。

Your feedback is very valuable in helping FSC shape the Advice Notes.

您的反馈非常有价值，有助于FSC形成建议说明。

Please note, it is possible to make changes to your responses during the entire period that the consultation is open. Even if you have submitted a response, you can return and edit it until the closing time of the consultation period.

请注意，在征询开放的整个期间，您可以修改您的回答。即使您已提交回复，也可以在征询期结束前返回并编辑回复。

Once this public consultation closes, on the 1 March 2024, the FSC Secretariat will proceed to analyze the feedback you and other interested stakeholders submitted.

一旦本次公开意见征询于2024年3月1日结束，FSC秘书处将着手分析您和其他相关利益主体提交的反馈。



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