



Frequently Asked Questions
常见问题

EUDR ALIGNED: **FSC EUDR 模块化解决方案** **相关要求常见问题**

FAQ on normative changes proposed in FSC Regulatory
Module, FSC Risk Assessments and system wide changes
FSC 自愿性法规模块、FSC 风险评估及其它系统性变革



INTRODUCTION

介绍

FSC is developing solutions to facilitate FSC certificate holders' efforts in demonstrating compliance with EU Regulations such as the European Union Deforestation Regulation, EUDR. One solution includes a modular approach to certification through the development of the FSC Regulatory Module—a comprehensive and adaptive extension to existing certification standards incorporating EUDR-specific criteria, definitions, documentation, and verification processes.

FSC 正在制定解决方案，以促进 FSC 证书持有者努力证明其符合欧盟法规，如《欧盟零毁林法案》（EUDR）。一种解决方案包括通过开发 FSC 自愿性法规模块的模块化认证方法，该模块是对现有认证标准的全面和适应性扩展，包含特定于 EUDR 的标准、定义、文件和验证流程。

The FSC Regulatory Module is not a standalone but rather a voluntary standard to be used in addition to current FSC certification requirements for forest management, chain of custody and controlled wood and to be optimally used in conjunction with other parts of EUDR Aligned. The FSC Regulatory Module also includes accreditation requirements for certification bodies to verify conformance of certificate holders against the voluntary standard.

FSC 自愿性法规模块不是一个独立的标准，而是一个自愿标准，用于补充当前 FSC 森林经营、产销监管链和受控木材的认证要求，并与其他部分配合使用 EUDR Aligned。FSC 自愿性法规模块还包括认证机构的认证要求，以验证证书持有者是否符合自愿标准。

FSC 自愿性法规模块的统一和实施的一个组成部分是 FSC 风险评估的应用。FSC 风险评估基于《FSC-PRO-60-006b》修订也在协商中。

In addition, FSC has developed a set of proposed normative changes in Advice Notes, which are applicable across the FSC system and based not solely on EUDR alignment but further alignment with <FSC-POL-01-007 Policy to Address Conversion> as well.

此外，FSC 在建议说明中制定了一套建议的规范性变更，适用于整个 FSC 系统，不仅基于 EUDR 一致性，还基于与《FSC-POL-01-007 Policy to Address Conversion》。

From 1 February 2024 – 1 March 2024, FSC is consulting these three complementary sets of normative requirements being developed to support EUDR alignment.

从 2024 年 2 月 1 日至 2024 年 3 月 1 日，FSC 正在对这三套互补的规范性要求进行咨询，以支持 EUDR 一致性。

This set of FAQs is to support understanding of the draft set of requirements in consultation.

这组常见问题旨在帮助理解咨询中的要求草案。

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Requirements Development Process 要求制定流程

What process is being applied to develop these requirements?

制定这些要求时采用了什么流程？

Due to the EUDR legislation published in June 2023 with an 18-month timeframe for implementation, FSC has needed to act quickly. The development process is done in accordance with <FSC-PRO-01-001 Development and Revision of FSC Requirements>. The FSC Board of Directors decided to apply a 'hybrid' process to develop the requirements, comprising elements of an 'accelerated process' and elements of a 'major process'. As such, an internal technical working group comprising FSC staff and a representative from ASI have developed the draft requirements. The process includes a public consultation for 30 days to ensure that all stakeholders are informed and can provide feedback in a timely manner. The final decision on the draft requirements will be made by the FSC Board of Directors.

由于 EUDR 于 2023 年 6 月公布，实施时限为 18 个月，FSC 需要迅速采取行动。开发过程按照《FSC-PRO-01-001》进行。FSC 董事会决定采用“混合”流程来制定要求，包括“加速流程”和“主要流程”的要素。因此，一个由 FSC 工作人员和国际认可服务机构代表组成的内部技术工作组制定了要求草案。该流程包括为期 30 天的公众咨询，以确保所有利益相关方了解情况并能及时提供反馈。FSC 董事会将对要求草案做出最终决定。

What are the requirements being consulted right now?

目前咨询的要求是什么？

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磋商。

1) A consultation on FSC Regulatory Module.

1) 就以下问题进行磋商 FSC 自愿性法规模块。

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

2) 就针对所有证书持有者的三份变更建议说明进行咨询。

3) 就以下问题进行磋商 FSC-PRO-60-006b Risk Assessment Framework Procedure 与受控木材和/或 FSC 自愿性法规模块的用户相关。

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.

邀请对 FSC 与 EUDR 对接（包括系统性变化和自愿模块）感兴趣的利益相关方对所有三次磋商做出回应。

Stakeholders interested in changes proposed to general certification requirements are invited to respond to consultations 2 and 3.

邀请对一般认证要求的拟议修改感兴趣的利益相关方对磋商 2 和 3 做出回应。

How will I know what happens with my feedback?

我如何知道我的反馈进度？

FSC will compile all feedback and develop a Consultation Report to review and indicate how feedback was addressed in the final draft. When this document is ready, all respondents will receive a copy of the Consultation Report. The Consultation Report will also be published on the applicable process pages here:

FSC 将汇编所有反馈意见，并编写一份咨询报告，以审查和说明最终草案中是如何处理反馈意见的。本文件准备就绪后，所有回答者都将收到一份咨询报告。咨询报告还将发布在以下适用的流程页面上：

- [FSC Regulatory Module](#)
- [FSC Regulatory Module](#)
- [FSC Risk Assessment Framework](#)
- [FSC Risk Assessment Framework](#)

What are the next steps after this consultation?

这次磋商后的下一步是什么？

After compiling and analysing feedback, the final draft of the FSC Regulatory Module and system-wide changes will go to the [Policy and Standards Committee](#) and then FSC International Board of Directors to approve the requirements. The Policy and Standards Committee is the approval body for the <FSC PRO-60-006b FSC Risk Assessment Framework>.

在汇编和分析反馈意见后，FSC 自愿性法规模块和系统性变更的最终草案将提交给 [Policy and Standards Committee](#) 然后 FSC 国际董事会批准这一要求。政策和标准委员会是《FSC PRO-60-006b FSC 风险评估框架》的审批机构。

When will the final requirements be published by?

最终要求将于何时发布？

All requirements under consultation are scheduled to be published on 1 July 2024 in order to offer certificate holders time to implement FSC requirements and tools as soon as possible. The requirements will be immediately effective for any certificate holders applying the FSC Regulatory Module, while the systemic changes and changes to the FSC Risk Assessment Framework include an 18-month transition starting on 1 October 2024 to end 1 January 2026.

所有协商中的要求计划于 2024 年 7 月 1 日公布，以便证书持有者有时间尽快实施 FSC 要求和工具。这些要求将立即对任何应用 FSC 自愿性法规模块的证书持有者生效，而系统性变化和 FSC 风险评估框架的变化包括从 2024 年 10 月 1 日开始至 2026 年 1 月 1 日结束的 18 个月过渡期。

What will the transition dates be?

过渡日期是什么时候？

The transition timeline will differ between the FSC Regulatory Module and the Advice Notes that will be applicable across the FSC system.

FSC 自愿性法规模块和将适用于整个 FSC 系统的建议说明之间的过渡时间表将有所不同。

The FSC Regulatory Module will become effective immediately on 1 July 2024 so that certificate holders applying the module can implement the requirements and tools immediately. There will be no transition timeline for the FSC Regulatory Module.

FSC 自愿性法规模块将于 2024 年 7 月 1 日立即生效，以便应用该模块的证书持有者可以立即实施要求和工具。FSC 自愿性法规模块没有过渡时间表。

The Advice Notes applicable across the FSC system will become effective immediately on 1 July 2024 for those certificate holders that are applying the FSC Regulatory module.

适用于整个 FSC 系统的建议说明将于 2024 年 7 月 1 日对那些正在应用 FSC 自愿性法规模块的证书持有者立即生效。

For all other certificate holders, the Advice Notes will only become effective on 1 October 2024.

对所有其他证书持有者而言，该通知将于 2024 年 10 月 1 日生效。

The transition end date for the system wide changes will be 1 April 2026, following the default 18-month timeline.

按照默认的 18 个月时间表，系统性变更的过渡结束日期将是 2026 年 4 月 1 日。

What other resources are available for me to better understand FSC's response to the EUDR alignment and these proposed normative requirements?

我还有哪些其他资源可以更好地了解 FSC 对 EUDR 校准和这些建议的规范性要求的回应？

FSC has published a range of supplementary materials to understand the upcoming requirements and offerings. They are as follows:

FSC 出版了一系列补充材料，以了解即将到来的要求和产品。它们如下：

- Interactive user journey webpage to understand the FSC Regulatory Module requirements based on user type
- 交互式用户旅程网页，根据用户类型了解 FSC 自愿性法规模块要求
- Infokit to highlight certification requirements based on the FSC Regulatory Module
- 基于 FSC 自愿性法规模块强调认证要求的信息包
- Consultation video to understand how the consultation works
- 咨询视频，了解咨询如何进行
- Brief on FSC Risk Assessment Framework changes
- FSC 风险评估框架变化简介
- Brief on system-wide changes
- 简要介绍系统性的变化
- Introductory video on Meeting your EUDR requirements with FSC
- 关于的介绍性视频 Meeting your EUDR requirements with FSC
- Resources on overall on how FSC is aligning with EUDR on the dedicated EUDR Aligned webpage here: www.fsc.org/eudr.
- 有关 FSC 如何与 EUDR 保持一致的资源，请访问统一 EUDR 的专用网页：www.fsc.org/eudr。

1. General system-wide certification requirements 系统性通用认证要求

I am not in the EU nor do I trade with the EU, are there changes relevant for me?

我不在欧盟，也不与欧盟进行贸易，是否有与我相关的变化？

Yes, FSC has developed some Advice Notes that are relevant across the FSC system. They are as follows:

是的，FSC 提出了一些与整个 FSC 体系相关的建议。它们如下：

- ADVICE-20-007-xx Deforestation-free products from FSC-certified management units
- ADVICE-20-007-02 Certification of primary forests
- ADVICE-40-005-27 Addressing systemic changes into requirements for sourcing FSC Controlled Wood
- ADVICE-40-004-26 Addressing systemic changes in Chain of Custody Certification

For forest management users: Closer alignment with the FSC Policy to Address Conversion by ensuring that all forest products sourced from FSC-certified management units are deforestation free. In addition, to clarify how degradation of primary forests is expressly not allowed in the FSC system.

对于森林经营用户：通过确保来自 FSC 认证管理单位的所有森林产品不毁林，更紧密地与 FSC 政策保持一致，以解决转换问题。此外，阐明 FSC 体系中如何明确不允许原始森林退化。

All CoC users may need to adjust their systems slightly if they want to pass on the new FSC Regulatory claim

如果所有 CoC 用户想要通过新的 FSC 监管声明，他们可能需要稍微调整他们的系统

To source controlled wood, users must shift to the new <FSC-PRO-60-006b Risk Assessment Framework> during upcoming annual review of risk assessments instead of using the risk assessment as outlined in <FSC-PRO-60-002a FSC National Risk Assessment Framework>, including new risk assessment terminologies to align with EUDR and be consistent throughout the FSC system.

为了对木材进行源头控制，用户必须在即将到来的风险评估年度审查期间转向新的《FSC-PRO-60-006b》，而不是使用《FSC-PRO-60-002a》中概述的风险评估，包括新的风险评估术语，以与 EUDR 保持一致并在整个 FSC 系统中保持一致。

How are these changes being included in the FSC normative framework?

这些变化是如何纳入 FSC 规范框架的？

These rules are provisionally stipulated by means of Advice Notes related to Forest Management and Chain of Custody Certification; including the sourcing of controlled material.

这些规则是通过有关森林经营和产销监管链认证的咨询说明临时规定的；包括受控材料的采购。

Why is FSC introducing new requirements for everyone because of EUDR?

为什么 FSC 会因为 EUDR 而对每个人都提出新的要求？

The intentions of the EUDR and FSC are already closely aligned. With the publication of EUDR, FSC is furthering that alignment by accelerating changes already planned based on alignment with the Policy to Address Conversion. As closer align with the intention of 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.

欧盟和 FSC 的意图已经非常一致。随着 EUDR 的发布，FSC 正在进一步推进这一调整，方法是在与政策保持一致的基础上加快已计划的变更，以解决转换问题。为了更好地与处理转换问题的政策意图保持一致，并与终止毁林的全球承诺保持一致，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。

2. FSC Regulatory Module general FSC 法规模块

Is the FSC Regulatory Module mandatory?

FSC 自愿性法规模块是强制性的吗？

No, the FSC Regulatory Module is a voluntary add-on module only.

不是，FSC 自愿性法规模块只是一个自愿添加的模块。

Is the FSC Regulatory Module for EUDR only or other regulations as well?

FSC 法规模块仅适用于 EUDR 还是也适用于其他法规？

Currently, the FSC Regulatory Module only addresses the European Deforestation Regulation (EUDR). As further regulatory developments progress, FSC could utilize the module for further regulatory alignments.

目前，FSC 自愿性法规模块仅涉及 EUDR。随着进一步的监管发展取得进展，FSC 可以利用该模块进行进一步的监管调整。

Who is the FSC Regulatory Module relevant for?

FSC 自愿性法规模块与谁相关？

This standard is for voluntary use by organizations applying for or holding FSC certification to extend their certification scope to align with the EUDR. It can be used in addition to all existing certification types and includes accreditation requirements for certification bodies.

本标准供申请或持有 FSC 认证的组织自愿使用，以扩大其认证范围，与 EUDR 保持一致。它可以作为所有现有认证类型的补充，并包括认证机构的认可要求。

The FSC Regulatory Module standard focuses on wood and wood-based products.

FSC 自愿性法规模块标准侧重于木材和木制品。

Can I get certified to the FSC Regulatory Module only?

我可以只获得 FSC 法规模块的认证吗？

No, this is not a standalone set of requirements but rather an add-on module. Users must also either already be certified with FSC or selecting to include the FSC Regulatory Module as part of their certification process.

不，这不是一组独立的要求，而是一个附加模块。用户还必须已经通过 FSC 认证，或者选择将 FSC 自愿性法规模块作为其认证流程的一部分。

How can we distinguish between operator and trader in FSC Requirements?

我们如何区分 FSC 要求中的运营商和贸易商？

The FSC Regulatory Module includes the definitions for “operator” and “trader” as well as icons to identify which requirement is relevant for which user-type based on the EUDR terminology of “operator”, “trader”, “SME,” and “non-SME.”

FSC 自愿性法规模块包括“运营商”和“交易商”的定义，以及根据 EUDR 术语“运营商”、“交易商”、“中小企业”和“非中小企业”来识别哪个要求与哪个用户类型相关的图标

When can I start getting certified to the FSC Regulatory Module?

我什么时候可以开始获得 FSC 自愿性法规模块认证？

Upon publication, users of the FSC Regulatory Module can immediately use it as it will be immediately effective. FSC recommends indicating to your certification body early if you are interested in implementation the module so they can plan their time accordingly.

FSC 自愿性法规模块一经发布，用户可以立即使用，因为它将立即生效。FSC 建议尽早向您的认证机构表明您是否有兴趣实施该模块，以便他们可以相应地计划他们的时间。

Will the FSC Regulatory Module guarantee compliance with EUDR?

FSC 自愿性法规模块能保证符合 EUDR 吗？

No, only competent authorities have the authority to verify compliance with the EUDR. FSC has included additional requirements that can support demonstrating this compliance by aligning FSC requirements with EUDR but the decision still rests solely on the competent authority. Certification bodies will check for conformity with FSC requirements, which can benefit users by having another third-party verifying conformity.

不，只有主管当局有权核查是否符合 EUDR。FSC 通过将 FSC 的要求与 EUDR 保持一致，纳入了额外的要求，以证明其符合要求，但决定权仍完全在主管部门。认证机构将检查是否符合 FSC 要求，这可以通过另一个第三方验证一致性来使用户受益。

3. Forest Management Regulatory Module 森林经营自愿性法规模块

Do I need to make significant changes to my practices to conform with the FSC Regulatory Module?

我是否需要对我的实践做出重大改变以符合 FSC 监管模式？

The FSC Regulatory Module has been developed to minimize the effort for forest management certificate holders building on the groundwork already done to achieve FSC Forest Management Certification.

FSC 自愿性法规模块的开发是为了在已经完成的 FSC 森林经营认证基础上，最大限度地减少森林经营证书持有者的工作量。

The EUDR requires that due diligence is exercised to demonstrate that the products are deforestation-free and have been produced according to the relevant legislation of the country of production.

EUDR 要求进行尽职调查，以证明产品没有砍伐森林，并且是根据生产国的相关法律生产的。

While FSC requirements, including the new ADVICE-20-007-XX Deforestation-free products from FSC certified management units, cover these aspects and there are not additional changes to forest practices required, EUDR (and therefore the module) requires activities, such as collection of information, risk assessments and risk mitigation measures, issuance of a due diligence statement, maintenance of records, etc.

虽然 FSC 要求，包括来自 FSC 认证管理单位的新建议 ADVICE-20-007-XX，涵盖了这些方面，并且不需要对森林实践进行额外的更改，但 EUDR（以及该模块）需要开展活动，如收集信息、风险评估和风险缓解措施、发布尽职调查声明、维护记录等。

The module supports forest management certificate holders to demonstrate that several of these aspects are covered by FSC certification, while minor efforts are still needed.

该模块支持森林经营证书持有者证明 FSC 认证涵盖了其中几个方面，但仍需稍加努力。

Do forest managers need to use the FSC Risk Assessments?

森林经理需要使用 FSC 风险评估吗？

Yes, if the management unit is not in a country or part of a country classified as 'low risk' in accordance with the EUDR three-tier risk system, the FSC Risk Assessment - if available for the geographical area where the management unit is located - is required to be used as the first step or reference to assess risk. FSC will provide a template:

是的，如果管理部门不在根据 EUDR 三级风险系统被分类为“低风险”的国家或国家的一部分，则 FSC 风险评估（如果管理部门所在的地理区域可用）需要用作评估风险的第一步或参考。FSC 将提供一个模板：

- To support certificate holders to assess the risk if no FSC Risk Assessment exists, and
- 如果没有 FSC 风险评估，支持证书持有者评估风险，以及
- To demonstrate that FSC Forest Management Certification is a solution to achieve no or negligible risk, if a non-negligible risk has been identified in the FSC Risk Assessment or the company risk assessment.

- 如果在 FSC 风险评估或公司风险评估中发现了不可忽略的风险，证明 FSC 森林经营认证是实现零风险或可忽略风险的解决方案。

When will this Risk Assessment template for forest managers be available?

森林经理风险评估模板何时可用？

The template will be available with the FSC Regulatory Module publication on 1 July 2024.

该模板将于 2024 年 7 月 1 日随 FSC 自愿性法规模块出版物一起发布。

Are there different requirements for Controlled Forest Management under the Regulatory Module?

在监管模式下对受控森林经营是否有不同的要求？

Certificate holders applying the Controlled Forest Management standard will have to conform with the same requirements as forest management certificate holders.

适用受控森林经营标准的证书持有者必须遵守与森林经营证书持有者相同的要求。

What about forest management groups?

森林经营小组呢？

The FSC Regulatory Module includes supplementary requirements regarding how the standard is implemented in a group set up. This includes, for example, how responsibilities are divided or how the internal monitoring system must be adapted. All group members must demonstrate conformity with the FSC Regulatory Module if this is included in the scope.

FSC 自愿性法规模块包括关于如何在集团机构中实施该标准的补充要求。例如，这包括如何划分职责或如何调整内部监控系统。如果 FSC 自愿性法规模块包含在范围内，所有集团成员必须证明符合该模块。

4. Chain of Custody Regulatory Module 产销监管链自愿性法规模块

What are the biggest changes for chain of custody users?

产销监管链用户最大的变化是什么？

Following the provisions of the EUDR, FSC's Regulatory Module includes specific requirements depending on your organization's position in the supply chain. (i.e., Operators and Traders). One new aspect that was introduced is the development and implementation of a Due Diligence System (DDS) that includes at a minimum the collection of information, a risk assessment, and risk mitigation processes. FSC is also introducing a new output claim (i.e., 'Regulatory') for products sold through the FSC Regulatory Module. As a result, certificate holders that are not using the FSC Regulatory Module can voluntarily decide to add the Regulatory claim to their scope.

根据 EUDR 的规定，FSC 的自愿性法规模块包括取决于您的组织在供应链中的位置的特定要求。（即运营商和贸易商）。引入的一个新方面是开发和实施尽职调查系统（DDS），该系统至少包括信息收集、风险评估和风险缓解流程。FSC 还为通过 FSC 自愿性法规模块销售的产品引入了一种新的产出声明（即“监管”）。因此，未使用 FSC 自愿性法规模块的证书持有者可以自愿决定将监管声明添加到其范围中。

If I am not implementing the FSC Regulatory Module are there still changes I need to make?

如果我没有实施 FSC 自愿性法规模块，我还需要进行哪些更改吗？

FSC is introducing a systemic change so that non-users of the FSC Regulatory Module have clear requirements for the purpose of controlling the Regulatory output claim. The organization may choose to use the Regulatory claim in sales documentation (followed by the FSC claim), provided that the provisions in the new advice note are met.

FSC 正在引入一项系统性变革，以便非 FSC 自愿性法规模块用户对控制监管产出声明有明确的要求。组织可以选择在销售文件中使用监管声明（随后是 FSC 声明），前提是符合新建议说明中的规定。

Do I need to update my due diligence system every time I collect more information?

我是否需要在每次收集更多信息时更新我的尽职调查系统？

The purpose of a due diligence system (DDS) is to assess and mitigate the risk of sourcing material from unacceptable sources. At a minimum the organization has to annually review (and revise if necessary) and address changes that may affect the relevance, effectiveness or adequacy of the DDS. As long as those changes do not occur (e.g., in supply area, type of products, species), the organization is not required to change its DDS every time it collects information.

尽职调查系统（DDS）的目的是评估和降低从不可接受的来源采购材料的风险。该组织至少必须每年审查（并在必要时进行修订）并解决可能影响 DDS 的相关性、有效性或充分性的变化。只要这些变化没有发生（例如，在供应区域、产品类型、物种方面），组织就不需要在每次收集信息时更改其 DDS。

What is my responsibility around information from my suppliers?

对于来自供应商的信息，我的职责是什么？

You are always responsible for the plausibility and accuracy of the information collected no matter where your supplier is based, inside or outside the European Union (EU). EUDR is only applicable to organizations that operate or trade in the EU, so if your supplier is outside of the EU they are not required to be compliant with the EUDR. Hence, a higher level of evaluation may be needed to determine their products' compliance.

无论您的供应商位于欧盟（EU）内部还是外部，您都必须对所收集信息的真实性和准确性负责。EUDR 仅适用于在欧盟运营或交易的组织，因此如果您的供应商不在欧盟境内，他们无需遵守 EUDR。因此，可能需要更高级别的评估来确定其产品的合规性。

What is the relationship between EUDR's Harmonized Codes and FSC's product types?

EUDR 的协调编码和 FSC 的产品类型之间有什么关系？

The Harmonized System (HS) codes are a standardized numerical method of classifying traded products. FSC product types are a general description of outputs based on the classification system specified in FSC-STD-40-004a. FSC standards apply to all products within the forest matrix, while the EUDR requires the reporting of specific HS codes, detailed in EUDR Annex I.

协调制度（HS）编码是贸易产品分类的一种标准化数字方法。FSC 产品类型是基于 FSC-STD-40-004a 中规定的分类系统的输出的一般描述。FSC 标准适用于森林矩阵中的所有产品，而欧盟产品报告要求报告具体的统一编码制度代码，详见欧盟产品报告附件一

This means that not every FSC-certified organization will fall under the provisions of the EUDR, but for those who trade in products that are listed in Annex I, compliance with the EUDR will be required. To bridge the gap between HS codes and FSC Product Classification, FSC is working on a guidance tool so that organizations can match both classifications.

这意味着并非每个 FSC 认证的组织都受 EUDR 条款的约束，但对于从事附件一所列产品贸易的组织来说，必须遵守 EUDR。为了弥合协调制度编码和 FSC 产品分类之间的差距，FSC 正在开发一个指导工具，以便各组织能够匹配这两种分类。

5. FSC Risk Assessments FSC 风险评估

What are the major changes proposed to process requirements for Risk Assessments?

提议对风险评估的流程要求进行哪些主要更改？

To align with EUDR, risk assessments are now applicable to Forest Management and Chain of Custody (including Controlled Wood). In addition, the following are also key process-related changes:

为了与 EUDR 保持一致，风险评估现在适用于森林经营和产销监管链（包括受控木材）。此外，以下也是与流程相关的主要变化：

- a) The process requirements have been streamlined considering the need for ensuring that the requirements can be followed by other organizations participating in the Risk Information Alliance (further information under the following link: <https://fsc.org/en/newscentre/standards/fscs-new-approach-for-risk-assessments-in-forests>).
- b) 考虑到需要确保参与风险信息联盟的其他组织能够遵循这些要求，因此简化了流程要求（更多信息请访问以下链接：<https://fsc.org/en/newscentre/standards/fscs-new-approach-for-risk-assessments-in-forests>).
- c) Establishment of mitigation measures where ‘non-negligible risks’ are identified.
- d) 在识别出“不可忽略的风险”时，制定缓解措施。
- e) Annual review of risk assessments, in addition to a complete review and eventual revision every 5 years.
- f) 风险评估的年度审查，以及每 5 年一次的全面审查和最终修订。

For further information on key process related changes, please read the crosswalk document shared in consultation together with the second draft of <FSC-PRO-60-006b V2-0 Risk Assessment Framework>: https://connect.fsc.org/sites/default/files/2024-01/FSC-PRO-60-006b%20V2-0%20D2-0_crosswalk.pdf.

有关关键流程相关变更的更多信息，请阅读与《FSC-PRO-60-006b V2-0》第二稿一起协商分享的交叉文件：https://connect.fsc.org/sites/default/files/2024-01/FSC-PRO-60-006b%20V2-0%20D2-0_crosswalk.pdf。

What are the major changes proposed to content requirements for Risk Assessments?

对风险评估内容要求的主要修改建议是什么？

The main changes proposed to content requirements can be summarized under the following aspects:

对内容要求提出的主要修改可归纳为以下几个方面：

- a) **A common set of indicators:** FSC Risk Assessments now include 76 indicators instead of 32 indicators. Although there is an increase in the number of indicators, the topics covered are mostly the same (e.g. legality assessment, human and labour rights, HCVs, conversion, GMO, etc.). The requirements have structurally changed through how the proposed indicators are written.
- b) 一套通用指标:FSC 风险评估现在包括 76 项指标，而不是 32 项指标。虽然指标数量有所增加，但涵盖的主题基本相同（例如合法性评估、人权和劳动权、HCV、转化、转基因生物等）。通过拟议指标的编写方式，要求在结构上发生了变化。

- c) **Assessment of conversion** is now aligned with the intention of <FSC-POL-01-007 Policy to Address Conversion> as well as EUDR, including adopting the precautionary approach to assess the risk of conversion. Therefore, a 'non-negligible' risk designation for conversion is applied as a default. Risk assessments developed by a chamber-balanced working group may change the risk designation through data analysis demonstrating that conversion has not taken place in the area under assessment since 31 December 2020.
- d) 转化率评估现在与《FSC-POL-01-007 Policy to Address Conversion》以及 EUDR，包括采用预防方法评估转换风险。因此，转换的“不可忽略”风险设定被用作默认值。由一个分庭平衡的工作组制定的风险评估可能会通过数据分析改变风险指定，数据分析表明自 2020 年 12 月 31 日以来，评估地区尚未发生转换。
- e) **Assessment of forest degradation:** A new indicator introduces the assessment of forest degradation: *There is no forest degradation since 31 December 2020*, including a numerical 'non-negligible' risk threshold to assess this indicator.
- f) 森林退化评估:一个新指标引入了森林退化评估:自 2020 年 12 月 31 日以来没有森林退化，包括一个评估该指标的数字“不可忽略”风险阈值。
- g) **Intact Forest Landscape boundaries** now updated by using other forms of best available information (in addition to the Global Forest Watch maps), such as historical harvesting documentation, existing Forest Stewardship Standard (FSS) frameworks, maps and external data provided by independent organizations, scientists and experts.
- h) 现在通过使用其他形式的最佳可得信息（除全球森林观察地图外）更新完整的森林景观边界，如历史采伐文件、现有的森林经营标准（FSS）框架、独立组织、科学家和专家提供的地图和外部数据。

For further information on key content related changes, please read the crosswalk document shared in consultation together with the second draft of <FSC-PRO-60-006b V2-0 Risk Assessment Framework >: https://connect.fsc.org/sites/default/files/2024-01/FSC-PRO-60-006b%20V2-0%20D2-0_crosswalk.pdf.

有关主要内容相关变更的更多信息，请阅读与《FSC-PRO-60-006b V2-0 风险评估框架》第二稿一起协商分享的交叉文件:https://connect.fsc.org/sites/default/files/2024-01/FSC-PRO-60-006b%20V2-0%20D2-0_crosswalk.pdf。

Do these Risk Assessments assess risk at country level or product level?

这些风险评估是在国家层面还是产品层面评估风险？

Risk Assessments can limit the scope of assessment to a country, a region that is part of a country, or a region that covers more than one country, as well as to specific products (e.g. timber, rubber, specific NTFPs, and more) and to some of the indicators that are part of <FSC-PRO-06-006b Risk Assessment Framework>.

风险评估可以将评估范围限制在一个国家、一个国家的一个地区或涵盖一个以上国家的一个地区，以及特定产品（如木材、橡胶、特定非木质林产品等）和《FSC-PRO-06-006b》中的一些指标。

Who can use FSC Risk Assessments – do I need to be certified?

谁可以使用 FSC 风险评估-我需要认证吗？

With the revised <FSC-PRO-06-006b Risk Assessment Framework> anybody can use the FSC Risk Assessments; there is no requirement for certification.

通过修订后的《FSC-PRO-06-006b》，任何人都可以使用 FSC 风险评估；没有认证要求。

When will the FSC Risk Assessments be available?

FSC 风险评估何时可用？

The <FSC-PRO-60-006b Risk Assessment Framework> will be published on 1 July 2024. FSC is working to have 20 prioritized Risk Assessments revised and available by 1 January 2025.

《FSC-PRO-60-006b》将于 2024 年 7 月 1 日发布。FSC 正努力在 2025 年 1 月 1 日前修订并提供 20 项优先风险评估。

Which countries will be prioritized?

哪些国家将被优先考虑？

FSC will publish related announcements on the [process page here](#).

FSC 将在以下页面发布相关公告 [process page here](#)。

Is there anything I can do to support the development of a Risk Assessment in my country?

我能做些什么来支持我国风险评估的发展？

Stakeholders are encouraged to provide inputs during consultation for the development or revision of a Risk Assessment. In addition, the Risk Assessments will be reviewed and updated annually to ensure that the applicable legislation, risk designations and mitigation measures are up-to-date. The annual review will be based on expert and stakeholder inputs. Stakeholders and experts will have the possibility to continuously provide inputs to the Risk Assessment and share information through an online platform provided by FSC.

鼓励利益相关方在制定或修订风险评估的磋商过程中提供意见。此外，将每年审查和更新风险评估，以确保适用的立法、风险指定和缓解措施是最新的。年度审查将基于专家和利益相关方的意见。利益相关方和专家将有可能通过 FSC 提供的在线平台持续为风险评估提供投入并分享信息。

Furthermore, FSC will be seeking to identify experts to support the revision of Risk Assessments in prioritized countries.

此外，FSC 将寻求确定专家，以支持修订优先国家的风险评估。

Will existing National Risk Assessments from FSC-PRO-60-002a be eligible to use for the FSC Regulatory Module?

FSC PRO-60-002 a 的现有国家风险评估是否有资格用于 FSC 自愿性法规模块？

No, only risk assessments developed in accordance with <FSC-PRO-60-006b Risk Assessment Framework> are to be used within the FSC Regulatory Module. Please see Part 4 'Forest Management Regulatory Module' regarding the template provided by FSC to be used by certificate holders to assess the risk if no FSC Risk Assessment exists.

不可以，只有根据《FSC-PRO-60-006b》制定的风险评估才能在 FSC 自愿性法规模块中使用。如果没有 FSC 风险评估，请参见第 4 部分“森林经营自愿性法规模块”，了解 FSC 提供的证书持有者用于评估风险的模板。

What's the relationship between the FSC Risk Assessments and the “Risk Information Alliance”?

FSC 风险评估和“风险信息联盟”之间有什么关系？

FSC is aiming for an alliance between partners facing similar challenges around developing risk assessments through the Risk Information Alliance. This Risk Information Alliance will foster global sustainability leadership by collaborating with other sustainability leaders with a focus on developing a single, standardized Risk Assessment framework that will benefit both certified and non-certified companies. The Risk Information Alliance aims to streamline the development of requirements and decision-making processes. However, <FSC-PRO-60-006b Risk Assessment Framework> still allows the development of risk assessments through chamber-balanced working groups; thus building flexibility and a means of fast-tracking risk assessment development with new avenues.

FSC 的目标是在面临类似挑战的合作伙伴之间建立联盟，通过 Risk Information Alliance。该风险信息联盟将通过与其他可持续发展领导者合作来培养全球可持续发展领导力，重点是开发一个单一的标准化风险评估框架，该框架将使认证和非认证公司受益。风险信息联盟旨在简化要求开发和决策流程。然而，《FSC-PRO-60-006b》仍然允许通过平衡的工作组进行风险评估；从而建立灵活性和以新途径快速跟踪风险评估发展的手段。

6. Regulatory Module Accreditation Requirements 自愿性法规模块认证要求

What is the role of certification bodies?

认证机构的作用是什么？

Certification bodies are verifying certificate holders' conformity to the certification requirements of the FSC Regulatory Module.

认证机构正在核查证书持有者是否符合 FSC 自愿性法规模块的认证要求。

How will these requirements be phased in?

这些要求将如何分阶段实施？

The application of the FSC Regulatory Module will require an extension of the certification scope of certificate holders. This means that certificate holders will need to make a request for scope extension to their certification body. The draft requirements indicate that at minimum certification bodies will need to conduct a desk check of the certificate holders' documentation (e.g. procedures) before the scope extension is made.

FSC 自愿性法规模块的应用将需要扩大证书持有者的认证范围。这意味着证书持有者需要向其认证机构提出范围扩展请求。草案要求指出，在扩大范围之前，认证机构至少需要对证书持有者的文件（如程序）进行案头检查。

Will there be training for certification bodies for the FSC Regulatory Module?

是否会对认证机构进行 FSC 自愿性法规模块的培训？

FSC is not planning to provide formal training to certification bodies on the FSC Regulatory Module but will be supporting the introduction and alignment process with FSC and between certification bodies by organizing workshops in Q4 2024 and in the following year. The FSC Regulatory Module accreditation requirements will be similar to the existing accreditation requirements and will not require key new competences from the certification bodies.

FSC 不打算向认证机构提供关于 FSC 自愿性法规模块的正式培训，但将通过在 2024 年第四季度和下一年组织研讨会来支持与 FSC 以及认证机构之间的介绍和协调过程。FSC 自愿性法规模块认证要求将类似于现有的认证要求，不需要认证机构提供新的关键能力。

Can auditors qualified for schemes other than FSC audit the FSC Regulatory Module?

除 FSC 计划外，其他计划的合格审核员能否审核 FSC 自愿性法规模块？

No, this will not be possible as the FSC Regulatory Module is not designed to ensure independent certification and accreditation against the module but works in conjunction with regular FSC certification and accreditation. Auditors will need to demonstrate the qualifications and trainings as required by <FSC-STD-20-001 General requirements for FSC accredited certification bodies> and <FSC-PRO-20-004 General requirements for an FSC Training Programme>, that are designed specifically for FSC.

不可以，因为 FSC 自愿性法规模块的设计不是为了确保针对该模块的独立认证和认可，而是与常规的 FSC 认证和认可协同工作。审核员需要证明《FSC-STD-20-001 FSC 认可认证机构的一般要求》和《FSC-PRO-20-004 FSC 培训计划的一般要求》所要求的资格和培训，这两项要求是专门为 FSC 设计的。



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