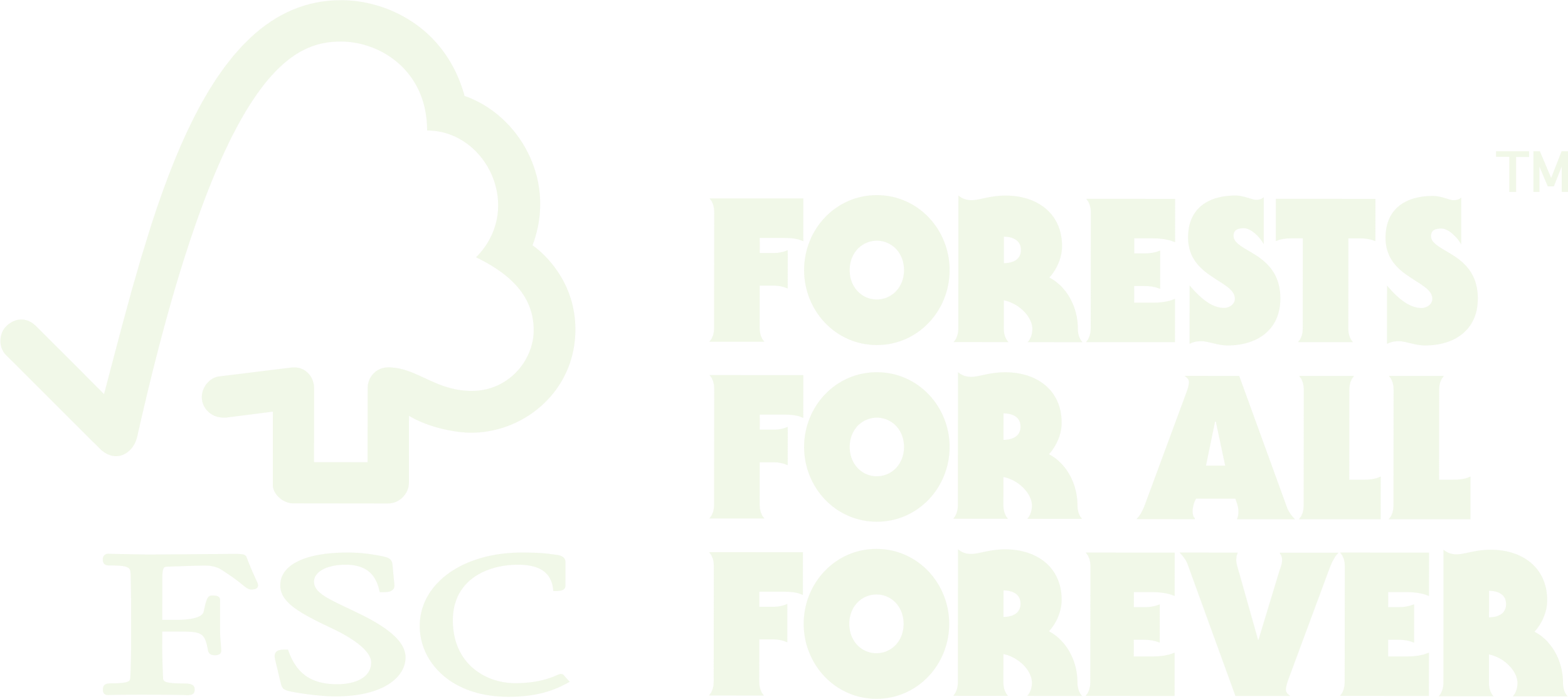


REGULATORY MODULE

FSC-STD-01-004 Public consultation: 01 February – 01 March 2024  
FSC-STD-01-004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 of 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 the FSC Regulatory Module

## 欢迎参加FSC法规模块的公开意见征询

### What is the FSC Regulatory Module?

### 什么是FSC法规模块？

The EUDR (REGULATION EU 2023/1115 known as the European Union Deforestation Regulation) is a pivotal EU initiative to limit deforestation and degradation caused by forestry and agricultural activities all over the world. Recognizing the significance of aligning forest management practices with this regulatory landscape, FSC has developed the FSC Regulatory Module—a comprehensive and adaptive extension to existing certification standards.

《欧盟零毁林法案》（EUDR）是欧盟的一项重要举措，旨在限制世界各地因林业和农业活动导致的毁林和退化。FSC认识到按照这一监管格局调整森林经营做法的重要性，开发了FSC法规模块——对现有认证标准的全面和适应性扩展。

The FSC Regulatory Module is a voluntary standard to be used in addition to current FSC certification requirements for forest management, chain of custody and controlled wood. It also covers the accreditation requirements for certification bodies to verify certificate holders’ conformance against the certification requirements of the FSC Regulatory Module. Certificate holders who decide to get certified against this additional module will have a tool and additional independent assurance to support their efforts in demonstrating compliance with EUDR requirements. The module covers EUDR requirements relevant for each certificate type.

FSC法规模块是一项自愿标准，用于补充目前FSC森林经营、产销监管链和受控木材的认证要求。它还包括认证机构的认证要求，以验证证书持有者是否符合FSC法规模块的认证要求。决定通过该额外模块认证的证书持有者将获得一个工具和额外的独立保证，以支持他们证明符合EUDR要求的努力。本模块涵盖与每种证书类型相关的EUDR要求。

### Who is the consultation for?

### 征询对象是谁？

This consultation is open for all interested stakeholders. The requirements of the FSC Regulatory Module D1-0 are targeted for companies that either operate in or provide products for EU markets, and for the certification bodies auditing the implementation of these requirements. Please also see the next section for full picture of changes proposed that are also linked to the FSC Regulatory Module.

本次征询对所有感兴趣的利益相关方开放。FSC法规模块D1-0的要求针对在欧盟市场经营或为欧盟市场提供产品的公司，以及审核这些要求实施情况的认证机构。另请参见下一节，全面了解与FSC法规模块相关的拟议变更。

### Other FSC consultations related to EUDR and the FSC Regulatory Module?

### 与EUDR和FSC法规模块相关的其他FSC征询？

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 in this consultation. You can focus on the questions of the sections that are most relevant to your knowledge, experience or interest.

不要求回答本次征询中的所有问题。您可以把重点放在与您的知识、经验或兴趣最相关的部分的问题上。

**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:

FSC-STD-01-004 V1-0 FSC Regulatory Module

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

**Do you wish to be informed about the next steps of the development of the FSC Regulatory Module?**

**您希望了解法规模块的下一步发展吗？**

* 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

C．Consultation Topics征询主题

## General – Scope, Terms and Definitions

## 概述-范围、术语和定义

The scope explains the voluntary add-on nature of the standard, and specifies which sections are relevant to which type of certification.

范围解释了标准的自愿附加性质，并指定了哪些部分与哪种类型的认证相关。

The Terms and Definition section presents a comparison of key terms and definitions used in Regulation (EU) 2023/1115 and their counterparts in the FSC system.

术语和定义部分对EUDR第2023/1115号法规中使用的关键术语和定义与FSC体系中的对应术语和定义进行了比较。

The FSC definitions refer to existing definitions and where required, includes proposals for new definitions and interpretations. References to proposed Advice Notes are also provided (see consultation of the Advice Notes open in the consultation platform). All new proposals have been identified with a colour and marking for the purposes of the consultation.

FSC定义是指现有的定义，并在必要时包括新定义和解释的建议。还提供了建议注释的参考（参见征询平台中打开的建议注释征询）。出于征询目的，所有新提案都用颜色和标记进行了标识。

**Questions for feedback:**

**反馈问题:**

How would you rate the clarity of the scope?

您如何评价范围的清晰度？

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

*5（非常清楚）- 1（非常不清楚）*

How would you rate the clarity of the comparison of the EUDR and FSC terminology?

您如何评价EUDR和FSC术语对比的清晰度？

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

*5（非常清楚）- 1（非常不清楚）*

Which specific aspects do you believe would benefit from additional clarification?

您认为哪些具体方面需要额外的澄清？

*Choose all that apply:*

*选择所有适用的选项:*

* *General presentation of the comparison*
* *比较的一般介绍*
* *Explanations of FSC counterparts*
* *FSC的对应解释*
* *References to interpretations and advice notes*
* *对解释和建议注释的引用*
* *Specific definitions (please provide the details below)*
* *具体定义（请在下面提供详细信息）*
* *Specific interpretations (please provide the details below)*
* *具体解释（请在下面提供详细信息）*
* *Other (please provide details below)*
* *其他(请在下面提供详细信息)*
* *No additional clarifications needed*
* *不需要额外的澄清*

Please provide more detail to your response

请提供更详细的回复

## Forest Management

## 森林经营

Section 1 of the FSC Regulatory Module outlines specific requirements that forest management certificate holders opting for this module must follow in addition to the requirements of the applicable Forest Stewardship Standard.

除了适用的森林经营标准的要求之外，FSC法规模块的第1节概述了选择该模块的森林经营证书持有者必须遵守的具体要求。

The main elements covered by these requirements are the establishment of a due diligence system that includes information collection, risk assessments and risk mitigation measures, and the issuance of due diligence statements.

这些要求涵盖的主要内容是建立尽职调查制度，包括信息收集、风险评估和风险缓解措施，以及发布尽职调查声明。

**Risk assessments by forest managers**

**森林经营者的风险评估**

EUDR要求尽职调查，以证明森林产品没有砍伐森林，并且是根据生产国的相关立法生产的。FSC将为森林经营者进行风险评估提供一个简化的模板。FSC要求森林经营者在该地理区域使用FSC风险评估。

Please see also the consultation of the FSC Risk Assessments open in the consultation platform for providing feedback to the content of the assessments.

另请参见征询平台中开放的FSC风险评估征询，以便对评估内容提供反馈。

**FSC certification as a risk mitigation measure**

**作为风险缓解措施的FSC认证**

The risk assessment required by the EUDR can result in either no risk, negligible risk or non-negligible risk. In instances where a risk assessment results in a non-negligible risk, the forest manager is required to implement risk mitigation measures to lower the risk level into negligible risk before selling the products.

EUDR要求的风险评估可能导致无风险、可忽略风险或不可忽略风险。在风险评估导致不可忽略风险的情况下，要求森林经营者在销售产品前实施风险缓解措施，将风险水平降至可忽略风险。

The FSC Regulatory Module considers FSC forest management certification to be an effective risk mitigation measure to achieve no or only a negligible risk level. Therefore, in practice, an FSC forest management certificate holder would not need to design nor implement any additional mitigation beyond what their forest management certification requires.

FSC法规模块认为FSC森林经营认证是一种有效的风险缓解措施，可以达到零风险或仅达到可忽略不计的风险水平。因此，在实践中，FSC森林经营证书持有者不需要设计或实施任何超出其森林经营证书要求的额外缓解措施。

**Controlled forest management**

**受控森林经营**

Organizations applying the recently published standard for controlled forest management certification <FSC-STD-30-010 V3-0 Controlled Forest Management> will be required to conform with the selected requirements of an applicable Forest Stewardship Standard. This will enable the organizations applying the version 3-0 of the standard to provide material conformant with the FSC Regulatory Module. The FSC Regulatory Module cannot be used by organizations that continue to apply the previous version of the controlled wood forest management standard (V2-0).

适用最近发布的受控森林经营认证标准《FSC-STD-30-010 V3-0》的组织将被要求遵守适用的森林经营标准的选定要求。这将使应用3-0版标准的组织能够提供符合FSC法规模块的材料。FSC法规模块不能被继续使用以前版本的受控木材森林经营标准（V2-0）的组织使用。

**Forest Management Groups**

**森林经营小组**

Section 3 of the FSC Regulatory Module outlines additional requirements for Group Entities applying or maintaining FSC Forest Management (FM), Forest Management / Chain of Custody (FM/CoC) or Controlled Forest Management (CFM) group certification. These requirements are in addition to the requirements of the applicable Forest Stewardship Standard or the <FSC-STD-30-010 V3-0 Controlled Forest Management>, and the <FSC-STD-30-005 V2-0 Forest Management Groups>.

FSC法规模块的第3节概述了申请或保持FSC森林经营（FM）、森林经营/产销监管链（FM/CoC）或受控森林经营（CFM）集团认证的集团实体的附加要求。这些要求是对适用的森林经营标准或《FSC-标准-30-010 V3-0受控森林经营》和《FSC-标准-30-005 V2-0森林经营小组》要求的补充。

**Questions for feedback:**

**反馈问题:**

1. **How would you rate the clarity of the proposed additional requirements in forest management section?**

**您如何评价森林经营部分拟议额外要求的清晰度？**

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

*5（非常清楚）- 1（非常不清楚）*

1. **Which specific aspects do you believe would benefit from additional clarification?**

**您认为哪些具体方面将需要额外的澄清？**

*Select all that apply*

*选择所有适用的选项*

* *due diligence*
* *尽职调查*
* *information collection*
* *信息采集*
* *risk assessment*
* *风险评估*
* *risk mitigation measures*
* *风险缓解措施*
* *due diligence statement*
* *尽职调查声明*
* *simplified due diligence*
* *简化尽职调查*
* ***non-compliances***
* *不合规*
* *other*
* *其他的*
* *no additional clarifications are needed*
* *不需要额外的澄清*

Please provide more details to your response

请在回复中提供更多详细信息

1. **How much effort do you estimate it would require to implement the requirements from this section compared to the efforts that your organization would already implement to comply with EUDR without the module?**

**与贵组织在没有该模块的情况下为符合EUDR而已经实施的工作相比，您估计实施本节要求需要多少工作？**

*5 (Efforts using the module go beyond efforts without using it) - 1 (Efforts using the module go below efforts without using it)*

*5（使用模块的努力超过不使用模块的努力）- 1（使用模块的努力低于不使用模块的努力）*

If you responded 4 or 5, please identify what additional actions you foresee.

如果您回答了4或5，请指出您预见的其他行动。

1. **Do you agree with the general proposal of using FSC Risk Assessments to support EUDR risk assessment requirements?**

**您是否同意使用FSC风险评估来支持EUDR风险评估要求的总体建议？**

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

*5（完全同意）–1（完全不同意）*

1. **How would you rate the usefulness of FSC providing a template for conducting the risk assessments, in particular when the relevant FSC Risk Assessment is not available?**

**您如何评价FSC提供风险评估模板的有用性，特别是在没有相关FSC风险评估的情况下？**

*5 (very useful) – 1 (not at all useful)*

*5（非常有用）–1（一点也没用）*

1. **Do you agree that FSC Forest Management Certification can be considered an effective risk mitigation measure to achieve no or only a negligible risk level?**

**您是否同意FSC森林经营认证可以被视为一种有效的风险缓解措施，以达到零风险或仅达到可忽略的风险水平？**

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

*5（完全同意）–1（完全不同意）*

If you have selected 1, 2 or 3, please explain your rationale

如果您选择了1、2或3，请解释您的理由

1. **Organizations applying the recently approved standard for controlled forest management certification <FSC-STD-30-010 V3-0 Controlled Forest Management> seeking conformance with the FSC Regulatory Module, will be required to conform with the requirements listed in Part 1 Applicable Forest Stewardship Standard. Do you think there is any relevant requirement missing?**

**采用最近批准的受控森林经营认证标准《FSC-STD-30-010 V3-0》寻求符合FSC法规模块的组织将被要求符合第1部分适用森林经营标准中列出的要求。您认为是否缺少任何相关要求？**

Yes

是

No

不

I do not know

我不知道

Please provide details to your response

请详细说明您的回复

1. **How would you rate the clarity of the requirements for Forest Management Groups (section 3 in the FSC Regulatory Module)?**

**您如何评价森林经营小组要求的清晰度（FSC法规模块第3节）？**

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

*5（非常清楚）- 1（非常不清楚）*

Please provide details to your response

请详细说明您的回复

1. **您认为是否缺少任何相关要求？**

* Yes
* 是
* No
* 不
* I do not know
* 我不知道

Please provide details to your response

请详细说明您的回复

1. **Please share any additional comments on the forest management section. If applicable, please refer to the specific section or clause your comments relate to.**

**请分享关于森林经营部分的任何其他意见。如果适用，请参考您的意见所涉及的具体章节或条款。**

## Chain of Custody

## 产销监管链

Part 2 of the FSC Regulatory Module outlines specific requirements chain of custody certificate holders opting for the module need to demonstrate conformity with, in addition to the requirements of the applicable standards.

除了适用标准的要求外，FSC法规模块的第2部分概述了选择该模块的证书持有者需要证明符合的具体要求。

The main elements covered by these requirements are the establishment of a due diligence system that includes information collection, risk assessments and risk mitigation measures, and the issuance of due diligence statements.

这些要求涵盖的主要内容是建立尽职调查制度，包括信息收集、风险评估和风险缓解措施，以及发布尽职调查声明。

**Verification of the supply chain**

**供应链的验证**

Conformity with the FSC Regulatory Module does not require that all the links in the supply chain are verified against the FSC Regulatory Module. The burden of collecting and verifying the data is with the organization and could take place with or without FSC tools, provided they are in line with the due diligence requirements. Organizations could use the ‘Regulatory’ claim in their sales documents and make general promotional claims about their use of FSC system (see also Section 7.1 in the FSC Regulatory Module).

符合FSC法规模块并不要求供应链中的所有环节都按照FSC法规模块进行验证。收集和验证数据的责任由组织承担，只要符合尽职调查要求，使用或不使用FSC工具都可以。组织可以在其销售文件中使用“法规”声明，并对其使用FSC系统进行一般性宣传声明（另请参见FSC法规模块的第7.1节）。

Clause 4.5.7 of the FSC Regulatory Module introduces the concept of a ‘fully verified supply chain’ (please see also Terms and definitions section of the standard), so that certificate holders can be recognized and benefit from a specific promotional statement regarding traceability and verification of the whole supply chain. FSC has considered different options by which this material could be identified by the certificate holder and passed through the supply chain (1. ‘Regulatory' claim for individual application of the Module, not fully verified supply chain; 2. ‘Regulatory+’ for fully verified supply chain), a reference or observation in sales documentation, a validation in FSC Blockchain, or a combination of these.

FSC法规模块的第4.5.7条引入了“完全验证供应链”的概念（另请参见标准的术语和定义部分），因此证书持有者可以得到认可并受益于有关整个供应链可追溯性和验证的特定宣传声明。FSC考虑了不同的方案，通过这些方案，该材料可以被证书持有者识别并通过供应链（1。“法规”声称模块的个别应用，未完全验证供应链；2.“法规+”用于完全验证的供应链）、销售文档中的参考或观察、FSC区块链中的验证或这些的组合。

**Questions for feedback:**

**反馈问题:**

1. **How would you rate the clarity of the chain of custody certification section?**

**您如何评价产销监管链认证部分的清晰度？**

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

*5（非常清楚）- 1（非常不清楚）*

1. **Which specific aspects do you believe would benefit from additional clarification?**

**您认为哪些具体方面将受益于额外的澄清？**

*Select all that apply:*

*选择所有适用的选项:*

* *Applicability note*
* *适用性说明*
* *CoC management system*
* *CoC经营系统*
* *material sourcing and handling*
* *材料采购和处理*
* ***FSC material and product records***
* *FSC材料和产品记录*
* *Sales*
* *销售*
* *Compliance with timber legality legislation*
* *遵守木材合法性立法*
* *Establishment of product groups*
* *产品组的建立*
* *Due diligence system (DDS)*
* *尽职调查系统*
* *Other*
* *其他的*
* *No clarifications are needed*
* *不需要澄清*

Please provide more details to your response.

请在回复中提供更多详细信息。

1. **How much effort do you estimate it would require to implement the requirements from this section compared to the efforts that your organization would already implement to comply with EUDR without the module?**

**与贵组织在没有该模块的情况下为符合EUDR而已经实施的工作相比，您估计实施本节要求需要多少工作？**

*5 (Efforts using the module go beyond efforts without using it) - 1 (Efforts using the module go below efforts without using it)*

*5（使用模块的努力超过不使用模块的努力）- 1（使用模块的努力低于不使用模块的努力）*

If you responded 4 or 5, please explain your rationale:

如果您回答了4或5，请解释您的理由:

1. **In order to increase transparency and consistency of assessments carried out by certification bodies under the FSC Regulatory Module, FSC may consider including a public summary report in the FSC database. To what extent do you support corrective action requests (CARs) being available in such report?** Note: The report shall not contain any confidential or sensitive information.

**为了提高FSC法规模块下认证机构评估的透明度和一致性，FSC可考虑在FSC数据库中纳入一份公开摘要报告。您在多大程度上支持此类报告中的纠正措施请求（CARs）？注:报告不得包含任何机密或敏感信息。**

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

*5（完全同意）–1（完全不同意）*

Please briefly explain your rationale.

请简要解释您的理由。

1. **To what extent do you agree that the ‘fully verified supply chain’ should be introduced?**
2. **您在多大程度上同意引入“完全验证的供应链”？**

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

*5（完全同意）–1（完全不同意）*

Please provide more details to your response.

请在回复中提供更多详细信息。

1. **Currently, Clause 4.5.7 states the Regulatory+ is optional for use in cases of a ‘fully verified supply chain’. This creates the possibility of suppliers not identifying it for all products, and thus, restraining organizations further down the supply chain from using/benefiting the claim and promotional statements. Would you support the requirement to be mandatory?**

**目前，第4.5.7条规定，在“完全验证的供应链”情况下，法规+是可选的。这使得供应商有可能无法对所有产品进行标识，从而限制供应链下游的组织使用/受益于声明和宣传声明。您会支持强制要求吗？**

*Yes / no / neutral*

*是/否/中立*

1. **Which method would you consider to be the preferred way to establish a ‘fully verified supply chain’?**

**您认为哪种方法是建立“完全验证的供应链”的首选方法？**

*Choose all that apply:*

*选择所有适用的选项:*

* *New claim (e.g., Regulatory+/REG+) for the sales documents*
* *销售文件的新声明（如法规+/法规+）*
* *A description (e.g., observation, note) in sales documents*
* *销售文档中的描述（如观察、注释）*
* *Use of FSC blockchain*
* *FSC区块链的使用*
* *Other*
* *其他的*

Please provide more details to your response.

请在回复中提供更多详细信息。

1. **Please share any additional comments on the chain of custody section. If applicable, please refer to the specific section or clause your comments relate to.**
2. **请分享关于产销监管链部分的任何其他意见。如果适用，请参考您的意见所涉及的具体章节或条款。**

**Project Certification**

**项目认证**

1. **How would you rate the clarity of the project certification section?**

**您如何评价项目认证部分的清晰度？**

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

*5（非常清楚）- 1（非常不清楚）*

1. **Which specific aspects do you believe would benefit from additional clarification?**

**您认为哪些具体方面将受益于额外的澄清？**

Select all that apply:

选择所有适用的选项:

* *Administrative requirements*
* *管理要求*
* *Material sourcing and handling*
* *材料采购和处理*
* *Sales*
* *销售*
* *Project statement*
* *项目陈述*
* *Compliance with timber legality legislation*
* *遵守木材合法性立法*
* *Due diligence system (DDS)*
* *尽职调查系统*
* *Other*
* *其他的*
* *No clarifications are needed*
* *不需要澄清*

Please provide more details to your response.

请在回复中提供更多详细信息。

1. **How much effort do you estimate it would take to implement the requirements in this section?**

**您估计实现本节中的要求需要付出多少努力？**

*5 (substantial) - 1 (minimal)*

*5（大量）- 1（最少）*

1. **How much effort do you estimate it would require to implement the requirements from this section compared to the efforts that your organization would already implement to comply with EUDR without the module?**

**与贵组织在没有该模块的情况下为符合EUDR而已经实施的工作相比，您估计实施本节要求需要多少工作？**

5 (Efforts using the module go beyond efforts without using it) - 1 (Efforts using the module go below efforts without using it)

5（使用模块的努力超过不使用模块的努力）- 1（使用模块的努力低于不使用模块的努力）

If you responded 4 or 5, please explain your rationale:

如果您回答了4或5，请解释您的理由:

1. **To increase transparency and consistency of assessments carried out by certification bodies under the FSC Regulatory Module, FSC may consider including a public summary report in the FSC database. To what extent do you support corrective action requests (CARs) being available in such report?** Note: The report shall not contain any confidential or sensitive information.

**为了提高FSC法规模块下认证机构评估的透明度和一致性，FSC可考虑在FSC数据库中纳入一份公开摘要报告。您在多大程度上支持此类报告中的纠正措施请求（car）？注:报告不得包含任何机密或敏感信息。**

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

*5（完全同意）–1（完全不同意）*

Please briefly explain your rationale.

请简要解释您的理由。

1. **Please share any additional comments on the project certification section. If applicable, please refer to the specific section or clause your comments relate to.**

**请在项目认证部分分享任何其他意见。如果适用，请参考您的意见所涉及的具体章节或条款。**

**Controlled Wood**

**受控木材**

Part 6 of the FSC Regulatory Module applies to organizations sourcing controlled material within their certification scope and cross-references to Part 4 of this standard. With the introduction of due diligence system (DDS) requirements related to chain of custody certification (FSC-STD-40-004), certificate holders with FSC-STD-40-005 included in their scope and opting for this module, will be required to conform with the additional provisions under this section, and thus adapting their current DDS.

FSC法规模块的第6部分适用于在其认证范围内采购受控材料的组织以及本标准第4部分的交叉引用。随着与产销监管链认证（FSC-STD-40-004）相关的尽职调查系统（DDS）要求的引入，FSC-STD-40-005认证范围内的证书持有者以及选择该模块的证书持有者将需要遵守本节中的其他规定，从而调整其当前的DDS。

The section also highlights changes that allows users to use FSC Risk Assessment Framework for conducting risk assessment and determining risk designations at each indicator level.

本节还强调了允许用户使用FSC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。

1. **How would you rate the clarity of the controlled wood section?**

**您如何评价受控木材部分的清晰度？**

1. *(very clear) - 1 (very unclear)*

*5（非常清楚）- 1（非常不清楚）*

1. **Please provide more details to your response in terms of understanding about requirements towards conducting risk assessment in accordance with FSC Risk Assessment Framework.**

**请就您对根据FSC风险评估框架进行风险评估的要求的理解提供更多详细信息。**

## Trademark use

## 商标使用

Part 3 of the FSC Regulatory Module outlines requirements that certificate holders must follow to use the FSC trademarks to promote products in the scope of the FSC Regulatory Module.

FSC法规模块的第3部分概述了证书持有者在使用FSC商标推广FSC法规模块范围内的产品时必须遵守的要求。

**Questions for feedback:**

**反馈问题:**

1. **How would you rate the clarity of the trademark use section?**

**您如何评价商标使用部分的清晰度？**

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

*5（非常清楚）- 1（非常不清楚）*

1. **Which specific aspects do you believe would benefit from additional clarification?**

**您认为哪些具体方面将需要额外的澄清？**

1. **Clauses 7.1.2. and 7.1.3 present promotional statements that may be used by certificate holders to promote products in the scope of the FSC Regulatory Module. Would you be interested to use these statements?**
2. **第7.1.2条。和7.1.3有关宣传许可，证书持有者可以使用这些声明来宣传FSC法规模块范围内的产品。您有兴趣使用这些陈述吗？**

*Yes/No/Maybe*

*是/否/也许*

Please briefly explain your rationale.

请简要解释您的理由。

1. **Please share any additional comments on the trademark section. If applicable, please refer to the specific clause your comments relate to.**

**请分享关于商标部分的任何其他意见。如果适用，请参考您的意见所涉及的具体条款。**

## Accreditation requirements 认证要求

Part 4 of the FSC Regulatory Module contains the accreditation requirements that certification bodies must follow for those certificate holders that include the FSC Regulatory Module in their scope of certification. The main element covered by these requirements is the verification of the certificate holders’ due diligence system.

FSC法规模块的第4部分包含认证机构必须遵守的认证要求，这些认证机构必须将FSC法规模块纳入其认证范围。这些要求所涵盖的主要内容是核实证书持有者的尽职调查制度。

**Questions for feedback (CBs and ASI)**

**反馈问题（认证机构和ASI）**

**How would you rate the clarity of this section?**

**您如何评价这一部分的清晰度？**

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

*5（非常清楚）- 1（非常不清楚）*

**Which specific aspects do you believe would benefit from additional clarification?**

**您认为哪些具体方面将需要额外的澄清？**

**How feasible is the verification of the accreditation requirements?**

**认证要求的验证可行性如何？**

*5 (highly feasible) - 1 (not feasible)*

*5（高度可行）- 1（不可行）*

If you responded 1 or 2 (not feasible) to the previous question, please explain your rationale:

如果您对前面的问题回答了1或2（不可行），请解释您的理由:

**How much additional time (in hours) would you estimate is needed to audit the FSC Regulatory Module?**

**您估计需要多长时间（小时）来审核FSC法规模块？**

a) for an FM operator

a）对于森林经营者

b) for a FM trader

对于FM交易者

c) for an CoC operator

对于CoC运营商

d) for a CoC trader

对于CoC交易商

5. Certification bodies are asked to evaluate the relevance, effectiveness, and adequacy of the clients DDS. This includes that a sample of the clients’ data (e.g. to the plot of land) needs to be verified, to confirm that correct information has been collected**. What criteria would you as certification body use to sample and verify the data (e.g. drawing from your experience in evaluating DDS for Controlled Wood)?**

**要求认证机构评估客户DDS的相关性、有效性和充分性。这包括需要核实客户数据样本（如地块），以确认收集的信息正确无误。作为认证机构，您将使用什么标准来采样和验证数据（例如，借鉴您在评估受控木材DDS方面的经验）？**

6. The transition timeline will differ between the FSC Regulatory Module and the systemic changes. 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 and this includes requests to certification bodies (CBs) for approval of risk assessments for CoC. There will be no transition timeline for the Regulatory Module.

FSC法规模块和系统变革的过渡时间表将有所不同。FSC法规模块将于2024年7月1日立即生效，因此应用该模块的证书持有者可以立即实施要求和工具，这包括请求认证机构批准CoC的风险评估。法规模块没有过渡时间表。

The systemic changes will also become effective immediately for those certificate holders that are applying the module. For all other certificate holders, the systemic changes will only become effective on 1 October 2024. The transition timeline for the systemic changes will end on 1 January 2026, following the default 18-month timeline. The application of the FSC Regulatory Module will require a scope extension of the certificate holders implying that CBs will at minimum need to conduct a desk check of the certificate holders’ procedures. FSC is expecting CBs to be prepared to evaluate certificate holders from the effective date onwards. **What are the implications for you as CBs?**

**系统更改也将立即对正在应用该模块的证书持有者生效。对于所有其他证书持有者而言，系统性变化将于2024年10月1日生效。按照默认的18个月时间表，系统变革的过渡时间表将于2026年1月1日结束。FSC法规模块的应用将需要扩大证书持有者的范围，这意味着认证机构至少需要对证书持有者的程序进行案头检查。FSC希望认证机构从生效之日起就做好评估证书持有者的准备。作为认证机构，这对您有什么影响？**

7. Section 10.5 introduces the requirements for the evaluation of the due diligence system (DDS) by the certification body for chain of custody (FSC-STD-40-004) and project certification (FSC-STD-40-006), which is an adaptation of the requirements currently present in Section 6 of FSC-STD-20-011, regarding the evaluation of controlled wood according to FSC-STD-40-005.

第10.5节介绍了产销监管链认证机构（FSC-STD-40-004）和项目认证机构（FSC-STD-40-006）对尽职调查系统（DDS）的评估要求，该要求改编自FSC-STD-20-011第6节中关于根据FSC-STD-40-005评估受控木材的现行要求。

考虑到一致性水平，可能有不同的方式来呈现/指示需求，并且这些方式可能或多或少对用户友好，例如，维护完整的需求集，以便在同一文档中明确措辞（当前场景）；创建人行横道表，确定标准中的适用条款和所需修订。

**Which would be your preferred option?**

**哪一个是您的首选？**

* Full set of requirements in the Regulatory Module
* 法规模块中的全套要求
* Crosswalk table
* 交叉对照表格
* Other
* 其他的

Please provide more details to your response:

请在回复中提供更多详细信息:

1. **Box 1, under Section 10.3 includes examples of major nonconformities to the requirements of the FSC Regulatory Module. Do you foresee any concerns with the examples provided (e.g., auditability)? What additional examples could to be included?**
2. **第10.3节下的方框1包括不符合FSC法规模块要求的主要不符合项示例。您对所提供的示例是否有任何顾虑（例如可审核性）？还可以包括哪些例子？**

## General feedback

## 一般反馈

Background and description of the issue the question(s) relate to

与问题相关的问题的背景和描述

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

**反馈问题（针对所有利益相关方）:**

1. **How helpful is the regulatory module add-on to certification requirements as written here, as a tool to support achieving compliance with EUDR?**

**作为一种支持符合EUDR的工具，法规模块附件对本文所述的认证要求有多大帮助？**

*5 (very helpful) - 1(very unhelpful)*

*5（非常有帮助）- 1（非常没有帮助）*

Please provide more detail to your response:

请提供更多详细信息:

1. **How likely are you to adopt the add-on module to support compliance of your products with the EUDR?**

**您采用附加模块来支持您的产品符合EUDR的可能性有多大？**

*5 (very likely) - 1(very unlikely)*

*5（非常可能）- 1（非常不可能）*

Please provide more detail to your response:

请提供更多详细信息:

1. **How easy is it to understand how the additional requirements relate to relevant certification requirements and to relevant EUDR requirements in the way the FSC Regulatory Module is presented now?**

**以目前FSC法规模块的方式理解附加要求与相关认证要求和相关EUDR要求的关系有多容易？**

*5 (very easy) - 1(very difficult)*

*5（非常容易）- 1（非常困难）*

1. **Is there something missing in the FSC Regulatory Module in terms of support in achieving compliance with the EUDR that should be considered in FSC requirements?**

**在支持实现符合EUDR方面，FSC法规模块是否缺少一些应在FSC要求中考虑的内容？**

Yes/No/Do not know

是/否/不知道

1. If yes, please provide more detail to your response:

如果是，请详细说明您的回答:

1. **Any other feedback regarding the FSC Regulatory Module:**

**关于FSC法规模块的任何其他反馈:**

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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 FSC Regulatory Module

您的反馈对于帮助FSC制定FSC法规模块非常有价值

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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