



COVID-19 POLICY RESPONSES

Collection of derogations, interpretations and frequently
asked questions

14 April 2022



Title: COVID-19 Policy Responses

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FOREWORD AND INTRODUCTION

This document contains the collection of requirements and FAQs related to the pandemic of novel coronavirus COVID-19.

Please note that the requirements are originally published individually, e.g. as an interpretation or derogation. All provisions are compiled in this document to offer a central source of information to FSC stakeholders.

The information is provided by thematic topics.

PART I – POLICY RESPONSES TO CB AUDITING REQUIREMENTS

PART II – POLICY RESPONSES TO CB AUDITOR REQUIREMENTS

PART III – POLICY RESPONSES TO COC CERTIFICATION REQUIREMENTS

PART I – POLICY RESPONSES TO CB AUDITING REQUIREMENTS

Generic derogations

Conducting certification audits remotely

Code	FSC-DER-2020-001	
Requirement (s)	As indicated below	
Request by CB	All FSC accredited certification bodies (CBs)	
Rationale as provided by CB	Due to the pandemic of novel coronavirus (COVID-19), vast areas of the world are subject to travel restrictions. INT-STD-20-011_04 foresees a case by case application for derogation by CBs in case of a demonstrated risk to the life or health of auditors, to replace an on-site audit with a desk audit. PSU is requested to give guidance on how CBs shall handle upcoming audits.	
Terms and definitions	Hybrid audit: Combination of a remote desk audit and an on-site inspection.	
PSU conclusion	Scenarios for applying this derogation	<p>This derogation applies to audits in situations where:</p> <ul style="list-style-type: none"> – The CB assesses there is a health risk involved in implementing an on-site audit; <p>or</p> <ul style="list-style-type: none"> – auditors are prevented from conducting an on-site audit due to travel restrictions.
	Preconditions for conducting desk and hybrid audits	<p>1. CBs shall have a documented policy, procedure, or both, outlining the process to be implemented in case an audit is affected by the novel coronavirus (COVID-19) pandemic. This shall include:</p> <ul style="list-style-type: none"> - A method for assessing whether an on-site audit can be replaced with a desk or hybrid audit, and - A description of the desk and hybrid audit methods to be applied in the case of FM and CoC, and - A process to implement the reporting and record keeping requirements of this derogation. <p>2. CBs and certificate holders shall:</p> <ul style="list-style-type: none"> - have the technical and operational capacity to conduct audits remotely or as hybrid audits, and - agree on a secure and confidential data transmission, and - ensure the availability of key staff.

		<p>3. CBs shall utilize information and communication technology (ICT) to evaluate all requirements from the annual audit plan to the extent possible.</p> <p>4. Desk audits and the remote component of a hybrid audit should be conducted on the basis of:</p> <ul style="list-style-type: none"> - virtual video meetings / virtual company tour, - interviews with relevant people of the certificate holder and stakeholders, - relevant documents and records, - satellite images (where possible), and other best available information. <p>5. When desk or hybrid audits are conducted, CBs shall demonstrate that the full scope of the audit can be covered, and that it is possible to evaluate with adequate assurance the conformity of the applicant to the normative requirements.</p>
	<p>Forest Management Pre-evaluations</p> <p>FSC-STD-20-007 V3-0 Definition Pre-evaluation</p>	<p>Pre-evaluation audits may be conducted as desk audits, if it is concluded that a desk audit can credibly be conducted.</p> <p>Alternatively, or when the CB concludes that a pre-evaluation audit cannot be credibly conducted as desk audit, the audit may be conducted as hybrid audit as regulated in FSC-DER-2020-012.</p>
	<p>Forest Management main audits (initial certification)</p> <p>FSC-STD-20-007 V3-0 Clause 5.4.2</p>	<p>Regulated in FSC-DER-2020-012</p>
	<p>Chain of Custody main audits (initial certification)</p>	<p>Regulated in FSC-DER-2020-005</p>
	<p>Surveillance audits</p> <p>FSC-STD-20-001 V4-0 Clause 4.7.1</p> <p>FSC-STD-20-007 V3-0 Clause 6.1.1; INT-STD-20-007_37</p> <p>FSC-STD-20-011 V4-0</p>	<p>CBs may apply either option below, either individually, or sequentially if needed.</p> <p>A. Surveillance audits may be postponed for a period not exceeding six (6) months beyond the maximum audit cycle.</p> <p>All other requirements including the requirement to have 4 surveillance audits within one certification cycle remain unaffected.</p> <p>B. Surveillance audits may be conducted as desk audits, when based on an assessment of the scale, intensity and risk of the Organization's activities it is concluded that a desk audit can credibly be conducted.</p>

	<p>Clauses 2.6 e), 9.2; INT-STD-20-011_04; Clause 9.2 and 9.3</p>	<p>Examples of the above that would prevent a desk audit include:</p> <ul style="list-style-type: none"> • Certificate holders with open major CARs that require on-site verification, • Certificate holders with purchase/sales mismatches proven through supply chain investigations conducted by the CB, ASI or FSC, • Certificate holders who fail to report purchase/sales when requested through a supply chain investigation, • Certificate holders with unresolved complaints. <p>C. Alternatively to Option B, or where a surveillance audit cannot be credibly conducted remotely it may:</p> <ul style="list-style-type: none"> • For FM: be conducted as hybrid audit as regulated in FSC-DER-2020-012. • For CoC: be conducted based on the process as described in Option B of the re-evaluation section. <p>Where audits cannot be conducted according to these options, the certificate shall be suspended.</p>
	<p>Re-evaluation audits</p> <p>FSC-STD-20-001 V4-0 Clause 1.4.2 and 1.4.3</p>	<p>CBs may apply either option below, either individually, or sequentially if needed.</p> <p>A. A certificate may be extended once for up to twelve (12) months beyond its original expiry date, by performing a surveillance audit (which may be conducted in line with this derogation).</p> <p>A re-evaluation audit shall then be performed before the maximum 12-month extension expires in order to renew certification.</p> <p>B. A re-evaluation hybrid audit for FM may be conducted as regulated in FSC-DER-2020-012.</p> <p>A re-evaluation audit for CoC may be conducted according to the preconditions, risk assessment and audit process as prescribed in FSC-DER-2020-005. While conducting the risk assessments, CHs that would be classified as 'medium' or 'high' risk (based on Annex A conditions), may be classified as 'low' risk by the CB if they can</p> <p>a) justify a low risk categorization based on past performance of the CH, or</p> <p>b) confirm that risk mitigation measures have been implemented by the CB (e.g. by sending a qualified quality management auditor in possession of a formal ISO 9001 certificate or completed training on ISO 19011 in accordance with FSC-PRO-20-004 on-site and conducting the audit as a hybrid audit).</p>

		<p>C. If after the first twelve (12) months extension of a certificate a re-evaluation hybrid audit for FM is not possible, the CB may extend the certificate another time for up to twelve (12) months (up to 24 months beyond its original expiry date), by performing a surveillance audit, which may be conducted in line with this derogation.</p> <p>In the surveillance audit the CB shall include the mandatory elements specified in Section 6 of FSC-STD-20-007 and shall audit requirements of the Forest Stewardship Standard based on the level of risk and previous performance of the certificate holder.</p>
	<p>Scope change audits FSC-STD-20-001 V4-0 Clause 4.8.3</p>	<p>Changes in the scope of certification shall be handled in line with FSC requirements and in accordance with operational procedures of CBs. Where on-site audits are required, they may be conducted as regulated in:</p> <ul style="list-style-type: none"> - FSC-DER-2020-005 for CoC - FSC-DER-2020-012 for FM
	<p>Transfer audits FSC-PRO-20-003 V1-0 Clause 3.2.f)</p>	<p>A transfer audit for FM may be conducted as a hybrid audit as regulated in FSC-DER-2020-012.</p> <p>A transfer audit for CoC may be conducted according to the preconditions, risk assessment and audit process as prescribed in FSC-DER-2020-005. While conducting the risk assessments, CHs that would be classified as 'medium' or 'high' risk (based on Annex A conditions), may be classified as 'low' risk by the CB, if they can confirm that risk mitigation measures have been implemented by the CB (e.g. by sending a qualified quality management auditor in possession of a formal ISO 9001 certificate or completed training on ISO 19011 in accordance with FSC-PRO-20-004 on-site and conducting the audit as a hybrid audit).</p>
	<p>On-site internal audits of bodies providing outsourced services FSC-STD-20-001 V4-0 Clause 2.5.5</p>	<p>Where 3-yearly on-site audits of bodies providing outsourced services to CBs are due, the annual on-site audit may be replaced by a desk audit.</p>
	<p>General</p>	<p>CBs shall retain documented evidence for each case where flexibility offered by this derogation has been applied and document the justification in the audit report (as applicable).</p>

Scope of derogation	<input checked="" type="checkbox"/> Generic (applicable by all certification bodies) <input type="checkbox"/> Specific (applicable only upon individual request and PSU confirmation)	
References	IAF ID 3: 2011: Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations IAF MD 4: 2018: The Use of Information and Communication Technology (ICT) for Auditing/ Assessment Purposes	
Approval date	30 January 2020; last amended 14 April 2022	
Effective date	04 May 2021	
Transition period	N.A.	
Period of validity	Until 31 December 2022, unless invalidated prior to that date. FSC monitors the global development of the pandemic of novel coronavirus (COVID-19) and will update or invalidate the derogation in full or in part, as necessary.	

Conducting COC main evaluation audits remotely

Code	FSC-DER-2020-005
Requirements	FSC-STD-20-011 Part 1, FSC-STD-40-003 V2-1
Rationale	<p>Due to the pandemic of novel coronavirus (COVID-19), vast areas of the world are subject to travel restrictions and many certification bodies have not been able to undertake physical onsite audits for main evaluations.</p> <p>There have been multiple requests from certification bodies for the possibility to undertake the main (initial) evaluation audits of new applicants remotely. Simultaneously, there have also been requests from group/multi-site certificate managers to permit remote internal audits for new applicants. This is expected to be a short-term measure till the COVID-19 situation improves and the related health risks and travel restrictions/social distancing restrictions are no longer applicable.</p>
PSU conclusion	<p>Scenarios for applying this derogation:</p> <ol style="list-style-type: none"> 1. Main evaluations by CBs in situations where: <ol style="list-style-type: none"> a. CBs assess there is a health risk involved in implementing an on-site audit; <i>or</i> b. auditors are prevented from conducting an on-site audit due to travel restrictions. 2. Central Office internal audits for new applicant sites for group/multi-site certificates where: <ol style="list-style-type: none"> a. the Participating Site is in an area with a health risk (demonstrated through verifiable public sources, e.g. official travel warnings or restrictions) due to coronavirus, <i>or</i> b. Central Office auditors are prevented from conducting an on-site audit due to travel restrictions imposed by organizational (certificate holder/Central Office) health and safety policies or public authorities.
	<p>Preconditions for conducting desk audits for main evaluations:</p> <ol style="list-style-type: none"> 1. CBs shall have a documented policy, procedure, or both, outlining the process to be implemented in case an audit is affected by the novel coronavirus (COVID-19) pandemic. This shall include: <ol style="list-style-type: none"> i. A method for assessing whether an on-site audit can be replaced with a desk audit, <i>and</i> ii. A description of the desk audit methods to be applied, <i>and</i> iii. A process to implement the reporting and record keeping requirements of this derogation. 2. CBs and certificate holders shall: <ol style="list-style-type: none"> i. have the technical and operational capacity to conduct audits remotely, <i>and</i> ii. agree on a secure and confidential data transmission <i>and</i> iii. ensure the availability of key staff. <p>NOTE: This requirement shall include all sites/group members covered in the application, and any contractors who are physically handling the material.</p>

	<p>3. CBs shall utilize information and communication technology (ICT) to evaluate the applicant.</p> <p>4. Desk audits should be conducted on the basis of:</p> <ul style="list-style-type: none"> i. virtual video meetings / virtual company tour, ii. interviews with relevant people of the certificate holder and stakeholders, iii. relevant documents and records, iv. other best available information.
	<p>Certification bodies may conduct desk audits for main evaluations of Chain of Custody and Project certification applicants according to the following requirements:</p> <p>1. Prior to conducting a main evaluation, the information obtained by the CB from the applicant shall be sufficient to conduct the risk assessment according to the requirements in this derogation (see FSC-STD-20-001 V4-0 Clause 4.1.3).</p> <p>2. The certification body can demonstrate that the full scope of the audit can be covered remotely, and it is possible to evaluate with adequate assurance the conformity of the applicant to the normative requirements.</p> <p>3. CBs shall conduct a risk assessment of each applicant according to the scenarios/ factors provided in Annex A to determine the option of conducting a fully remote audit (low risk), a partially remote audit (medium risk), or if a mandatory on-site audit is required (high risk).The risk assessment is to be undertaken at the level of a single site and not at the certificate level. For multi-site certificates, the risk assessment shall be undertaken for each participating site (or for each site selected by sampling) during the evaluation audit.</p> <p>4. When an applicant falls into more than one risk category, the CB shall adopt the precautionary approach and apply the audit type of the higher category.</p> <p>5. Applicants with medium risk shall be audited in a two-stage audit process: A Stage 1 initial desk audit which can lead to certificate issuance, followed by a Stage 2 on-site audit, to be undertaken when the related health risks have abated and/or travel restrictions are no longer applicable or at the first surveillance evaluation (see Clause 7 below), whichever is earlier. A certificate can be issued on successful completion of Stage 1. Stage 2 audit shall cover the factors which lead to the medium risk categorization and include requirements whose compliance cannot be verified though a remote audit or which require an on-site follow-up to verify compliance once processing of FSC material starts.</p> <p>6. In case the Stage 2 audit cannot be undertaken until the time of the first surveillance evaluation (due to health risks and/or travel restrictions), it shall be replaced by the full surveillance evaluation, undertaken as an on-site audit.</p> <ul style="list-style-type: none"> a. In case the Stage 2 audit (or the full surveillance audit) cannot be undertaken due to continued health risk or travel restrictions imposed by organizational (certificate holder/Central Office) health and safety policies or public authorities, the audit shall be conducted as per the provisions laid out for surveillance audits in FSC-DER-2020-001 (provided the FSC-DER-2020-001 is still active). <p>7. The first surveillance evaluation after certification shall be conducted within twelve (12) months after the date of the desk audit. Failure shall lead to the suspension of the certificate. In case the first surveillance audit cannot be held as a full onsite audit, then it shall be undertaken as per the provisions of FSC-DER-2020-001(provided the FSC-DER-2020-001 is still active).</p>

8. Any scenario not covered in Annex A shall be considered as 'high-risk'. In such cases, CBs may approach PSU to provide further instructions.

NOTE: This derogation may be modified/ updated based on additional information regarding risk levels categories.

9. CBs shall retain documented evidence for each case where this derogation has been applied and document the justification in the audit report.

Central offices of Group/Multi-site certificates may replace the initial internal audits for new applicant sites/members by desk audits according to the following requirements:

10. The new applicant site meets the requirements of clause 5.3.5 of FSC-STD-40-003 V2-1 *or*

11. The Central Office shall conduct a risk assessment of each applicant according to the scenarios/ factors provided in **Annex A** to determine the option of conducting a fully remote audit (low risk), a partially remote audit (medium risk), or if a mandatory on-site audit is required (high risk). The risk assessment is to be undertaken at the level of each new applicant site.

12. When an applicant falls into more than one risk category, the Central Office shall adopt the precautionary approach and apply the audit type of the higher category.

13. The risk assessment by the Central Office shall be approved by their certification body prior to conducting remote audits.

14. Applicants with **medium risk** shall be audited in a two-stage audit process: A Stage 1 initial desk audit which can lead to inclusion in the FSC group/multi-site certificate, followed by a Stage 2 on-site audit, to be undertaken when the related health risks have abated and/or travel restrictions are no longer applicable or at the first annual audit (see Clause 15, below), whichever is earlier. Stage 2 audit shall cover the factors which lead to the medium risk categorization and include requirements whose compliance cannot be verified through a remote audit or which require an on-site follow-up to verify compliance once processing of FSC material starts.

15. In case the Stage 2 audit cannot be undertaken until the time of the first annual audit (due to health risks and/or travel restrictions), the stage 2 audit shall be replaced by the full annual audit, which shall be conducted as an on-site audit.

16. In case the Stage 2 audit or the full annual audit cannot be undertaken due to continued health risk or travel restrictions imposed by organizational (certificate holder/Central Office) health and safety policies or public authorities, the audit shall be conducted as a surveillance audit as per the provisions laid out for surveillance audits in FSC-DER-2020-001 (provided the FSC-DER-2020-001 is still active)

- a. Central office and applicant sites shall:
 - have the technical and operational capacity to conduct audits remotely, *and*
 - agree on a secure and confidential data transmission *and*
 - ensure the availability of key staff.

17. The Central Office shall retain documented evidence for each applicant where this derogation has been applied.

Scope of derogation	<input checked="" type="checkbox"/> Generic (applicable by all certification bodies and certificate holders) <input type="checkbox"/> Specific (applicable only upon individual request and PSU confirmation)
Approval date	08 May 2020; last amended 14 April 2022
Effective date	15 June 2020
Period of validity	Until 31 December 2022, unless invalidated prior to that date. FSC monitors the global development of the pandemic of novel coronavirus (COVID-19) and will update or withdraw the derogation in full or part, as necessary.

Annex A: Risk determination for undertaking remote main evaluation audits

Scenario	Low risk	Medium risk	High risk
Traders	<ul style="list-style-type: none"> • without physical possession • with physical possession, but restricted to storage/trading in finished and labelled products 	<ul style="list-style-type: none"> • With physical possession and trading in unfinished/non-labelled products 	
Primary and secondary producers/processors/printers and related services	<ul style="list-style-type: none"> • Exclusively handling certified products made of single input material (e.g., whole site deals with FSC 100%) • All inputs to production are eligible inputs according to Table B in FSC-STD-40-004, only transfer system is used and physical segregation is not required 	<ul style="list-style-type: none"> • Use of either percentage or credit system with/without multiple product groups 	<ul style="list-style-type: none"> • High complexity with management and uses of all control systems.
Non-eligible input entering the supply chain	<ul style="list-style-type: none"> • Risk mitigated by temporal separation of material 	<ul style="list-style-type: none"> • Risk mitigated by identification of material • Risk mitigated by physical separation of materials if mitigation can be verified by real time video 	<ul style="list-style-type: none"> • Risk mitigated by physical separation of materials
Contractors/outsourcing activities	<ul style="list-style-type: none"> • Low risk contractors or High-risk contractors with low risk categorization as per Clause 9.3 of FSC-STD-20-011 	<ul style="list-style-type: none"> • Low risk contractors but with identified risk of improper additions or mixing by the contractors at the contracting facility 	<ul style="list-style-type: none"> • High risk contractors as defined in Clause 9.2 of FSC-STD-20-011
Sourcing reclaimed materials	<ul style="list-style-type: none"> • Supplier audit program undertaken by another FSC accredited CB 	<ul style="list-style-type: none"> • Reclaimed material classification can be demonstrated through objective evidence upon receipt. 	<ul style="list-style-type: none"> • Supplier audit program undertaken by applicant organization <i>and</i> reclaimed material classification through objective evidence not possible.
Sourcing CW through implementation DDS as per requirements of FSC-STD-40-005 standard	<ul style="list-style-type: none"> • Low risk of origin, <i>and</i> • Low risk of mixing 	<ul style="list-style-type: none"> • Specified risk for origin (mitigation measures do not require field level verification) <i>and</i> • Low risk of mixing 	<ul style="list-style-type: none"> • Specified risk for origin (mitigation measures require field level verification) <i>or</i> • Specified risk of mixing that can be mitigated only by physical separation.
Group and multi-site certification (Central office requirements may be evaluated in the same manner as a single site)	<ul style="list-style-type: none"> • Normal risk** participating site 	<ul style="list-style-type: none"> • High risk participating site* which meets remote audit requirements for reclaimed materials sourcing, CW sourcing and for contractors 	<ul style="list-style-type: none"> • High risk participating site*.
Other risk factors		<ul style="list-style-type: none"> • Custom manufactured products with individual conversion factors • Project certification 	<ul style="list-style-type: none"> • Unresolved complaints/disputes regarding the organization's conformity to

the requirements of FSC
standards

***High-risk participating site:** A participating site operating a due diligence system according to FSC-STD-40-005, a supplier audit program for reclaimed materials according to FSC-STD-40-007, or high-risk outsourcing to a non-FSC-certified contractor.

****Normal risk participating site:** A participating site that does not conduct any of the activities considered 'high risk' above.

Conducting FM 'hybrid' audits

Code	FSC-DER-2020-012
Requirements	FSC-STD-20-007 V3-0 Clause 5.4.2 FSC-STD-30-005 V1-1 Clause 3.4 FSC-DER-2020-001
Rationale	<p>Considering the extended duration of novel coronavirus (COVID-19) that prevents many certification bodies (CBs) from conducting physical on-site audits for forest management evaluations, FSC has developed a 'hybrid audit' approach that integrates remote audits with on-site inspections.</p> <p>This temporary model is designed to maintain the integrity of the evaluation while avoiding a deadlock in the (re-) issuance, maintenance and transfer of Forest Management certificates.</p>
Terms and definitions	<p>Hybrid audit: Combination of a remote desk audit and an on-site inspection.</p> <p>Audit team: is made up of one or more auditors, one of whom is appointed to be the audit team leader. When necessary, audit teams are also supported by technical experts and/or further personnel (e.g. interpreter), who assist auditors but do not themselves act as auditors.</p> <p>Audit team leader: an auditor who is competent to lead the audit and the audit team.</p> <p>Technical expert: a person supporting an audit team by providing specific knowledge or expertise about a specific sector, content, process or activity being audited. The person does not act as auditor.</p>
PSU conclusion	<p>Scenarios for applying this derogation:</p> <p>This derogation, in combination with FSC-DER-2020-001, may be applied to forest management pre-, main, surveillance, re-evaluation, change of scope and certificate transfer audits in situations where:</p> <ul style="list-style-type: none"> – the CB assesses there is a demonstrated health risk involved in implementing an on-site audit; <p>or</p> <ul style="list-style-type: none"> – auditors are prevented from conducting an on-site audit due to travel restrictions. <p>Preconditions for conducting hybrid audits:</p> <ol style="list-style-type: none"> 1. CBs shall have a documented policy, procedure, or both, outlining the process to be implemented in case an evaluation is

	<p>affected by the novel coronavirus (COVID-19) pandemic. This shall include:</p> <ul style="list-style-type: none"> a) A method for assessing whether an on-site audit can be replaced with a hybrid audit, including a risk assessment, <i>and</i> b) A description of the hybrid audit methods, including safeguards for risk mitigation to be applied, <i>and</i> c) A process to implement the reporting and record keeping requirements of this derogation. <p>2. CBs and The Organization shall:</p> <ul style="list-style-type: none"> a) have the technical and operational capacity to conduct hybrid audits, <i>and</i> b) agree on a secure and confidential data transmission, <i>and</i> c) ensure the availability of key staff on the ground. <p>3. Technical expert(s) on the ground shall*:</p> <ul style="list-style-type: none"> a) Have demonstrated experience and qualifications covering all social, environmental and economic aspects that are required in the respective audit (see: FSC-STD-20-001 V4-0 EN Box 2: Key considerations for selection of audit team members for forest management audits), <i>and</i> b) Have participated in at least three on-site FM audits before, OR have participated in at least one on-site FM audit and have completed and passed an FSC FM auditor training course, <i>and</i> c) Be able to work independently, <i>and</i> d) Have access and sufficient technical skills to utilize required technology, incl. video capabilities to share field observations. <p>4. CBs shall demonstrate that the full scope of the audit can be covered with the hybrid audit approach, and that it is possible to evaluate The Organization's conformity with adequate assurance.</p> <p>5. CBs shall utilize information and communication technology (ICT) to evaluate The Organization and guide the audit team member(s) on the ground. A check-in/briefing/exchange between the remote audit team member(s) and the on-site team member(s) shall be conducted before, during and at end of the audit.</p> <p>6. Hybrid audits shall be conducted on the basis of:</p> <ul style="list-style-type: none"> a) A qualified audit team leader leading the audit remotely, <i>and</i> b) Technical expert(s) and/or qualified auditor(s) on-site to obtain audit evidence, <i>and</i> c) Virtual video meetings between the remote audit team leader and The Organization / on-site team member(s), <i>and</i> d) Interviews with relevant managers, employees, contractors and other stakeholders (remotely and / or on-site), <i>and</i> e) A review of relevant documents and records (remotely and / or on-site), <i>and</i>
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	<p>f) Conducting the opening and closing meeting of the hybrid audit with physical / virtual presence of the full audit team (auditors and local experts) together with relevant staff of The Organization, <i>and</i></p> <p>g) Other best available information.</p> <p>* Clause 3 applies in audits where no qualified auditor is joining the on-site component of the hybrid audit.</p> <p>Conducting hybrid audits for forest management evaluations</p> <p>1. CBs may conduct hybrid audits for forest management evaluations in connection with FSC-DER-2020-001 when:</p> <ul style="list-style-type: none"> • This derogation can be applied according to the health and risk scenarios (above), <i>and</i> • The preconditions for conducting hybrid audits (above) are fulfilled. <p>2. CBs shall retain documented evidence for each case where this derogation has been applied and document the justification in the audit report.</p> <p>3. CBs shall submit an aggregated quarterly report to FSC on audits conducted according to this derogation, within two (2) weeks of the end of each quarter.</p>
Scope of derogation	<input checked="" type="checkbox"/> Generic (applicable by all certification bodies and certificate holders) <input type="checkbox"/> Specific (applicable only upon individual request and PSU confirmation)
Approval date	20 November 2020; last amended 14 April 2022
Period of validity	<p>Until 31 December 2022, unless invalidated prior to that date.</p> <p>FSC monitors the global development of the pandemic of novel coronavirus (COVID-19) and will update or invalidate the derogation in full or in part, as necessary.</p>

Interpretations

Extending transfer audit date

Code	INT-PRO-20-003_09
Requirement (s)	FSC-PRO-20-003 V1-0, Clause 3.2.f) FSC-DER-2020-001
Publication date	26 May 2020; last amended 14 April 2022 Effective from the date of publication until 31 December 2022, or until invalidated prior to that date. This interpretation will be updated as necessary.
<p>As a transfer audit is supposed to be conducted according to the requirements for a surveillance evaluation, can this transfer audit also be postponed in accordance with FSC-DER-2020-001?</p> <p>CoC</p> <p>Yes, the transfer audit can be postponed, but shall be conducted within (6) six months of the agreed transfer date. In case of medium risk, this timeline refers to the Stage 1 audit.</p> <p>FM</p> <p>Yes, the transfer audit can be postponed, but shall be conducted within (6) six months of the agreed transfer date.</p>	

Frequently Asked Questions

FAQ I-1	FSC-DER-2020-001: Recertification
Question	Is it required to complete the surveillance audit before the certificate expires?
Answer	The surveillance audit required to extend the certificate should be completed before the certificate expires, but under the COVID-19 scenario the certificate may be extended for up to 6 months according to FSC-STD-20-001 V4-0 Clause 1.4.4 in order to permit the surveillance audit to be completed. Upon successful completion of the surveillance audit, the certificate may then be extended for 12 months beyond its original expiry date. Please note that both timelines refer to the original expiry date and cannot be added up (thus, no extension for 6 months + 12 months).

FAQ I-2	FSC-DER-2020-001: Recertification
Question	Do CBs need to issue physical certificates for extended validity periods or is it sufficient to extend the validity in the FSC Database?
Answer	Issuing physical certificates is voluntary as of V4-0 of FSC-STD-20 001. It is therefore not required to re-issue a certificate with a new expiry date, unless the CB decides it's necessary to do so. It is however required that the database entry is updated accordingly.

FAQ I-3	FSC-DER-2020-001: Recertification
Question	When a certificate has been extended based on a surveillance audit as per FSC-DER-2020-001, shall the CB then conduct both the recertification audit and the first surveillance in the following year?
Answer	No, in the following year the CB shall conduct the recertification audit, based on which a new 5-year certificate may be issued. The first surveillance would then be due in the year after that (2023 for re-certifications in 2022).

FAQ I-4	FSC-DER-2020-005: COC main evaluation
Question	Can a printer who is buying FSC and PEFC paper, and therefore has to segregate their paper stocks, be audited remotely?
Answer	A printer who is buying and using both FSC and PEFC paper does not qualify for 'low risk' designation, since they need to segregate their paper stocks. However, they could be audited remotely with a 2 stage audit process as provided for scenarios with medium risk.

PART II – POLICY RESPONSES TO CB AUDITOR REQUIREMENTS

Generic derogation

Code	FSC-DER-2020-004	
Requirement (s)	As indicated below	
Request by	FSC accredited CBs and (independent) training providers	
Rationale as provided by CBs / and (independent) training providers	Due to the pandemic of novel coronavirus (COVID-19), vast areas of the world are subject to travel restrictions. This results in difficulties for CBs and (independent) training providers to ensure conformity with FSC requirements with regards to auditor qualification and other requirements specifically related to auditors.	
PSU conclusion	Scenarios for applying this derogation	This derogation applies in situations where: – CBs assess there is a health risk involved in allowing auditors to travel to conform with FSC training and (continuous) qualification requirements; or –auditor candidates, qualified auditors, supervising auditors, training providers, trainers and trainees are prevented from conducting and participating in trainings and audits due to travel restrictions.
	Qualification of auditor candidates FSC-STD-20-001 V4-0 Annex 2, Table 2, 1.1, #5 Annex 2, Table 3, 2.1, #5	It is not possible to qualify FM auditor candidates by replacing on-site audits by desk audits. CoC auditor candidates that participated in at least two on-site audits may conduct CoC desk audits, if they otherwise successfully completed their training program in accordance with FSC requirements. Prior to conducting any on-site audits on their own, such auditors are required to complete the remaining on-site audits.
	Continuous qualification FSC-STD-20-001 V4-0 Annex 2, Table 2, 1.2, #2 Annex 2, Table 3, 2.2, #2	The number of days conducted as desk-based audits may count as auditing days for retaining auditor status and shall be recorded accordingly.
	Continuous qualification FSC-STD-20-001 V4-0 Annex 2, Table 2, 1.2, #3 Annex 2, Table 3, 2.2, #3	All 3-yearly witness audits that are due in 2020 may be postponed for up to twelve (12) months. All required 3-yearly witness audits (including the ones previously postponed) may be done remotely.

	<p>Training courses</p> <p>FSC-PRO-20-004 V2-1</p> <p>Clause 3.3.5</p>	<p>Training Providers may replace classroom (in-person) training by remote trainings, based on the following specifications:</p> <ul style="list-style-type: none"> - travel restrictions are in place for any of the registered trainees or the trainer(s). - the training provider shall document all cases of travel restrictions; - trainings should offer similar opportunities as in-person trainings to conduct practical exercises and allow for interaction of trainer(s) and trainees (as far as technology allows), - decisions about replacing in-person trainings by remote trainings may be based on travel restrictions that are in place up to two months before the scheduled in-person course. <p>This derogation may be retroactively applied to training courses that were cancelled due to coronavirus prior to the publication of the derogation.</p> <p>Note: Clause 1.2 specifying that 'two hours of in-person training are seen as equivalent to one hour of online training' may also be applied to this derogation.</p>
	<p>Auditor rotation</p> <p>FSC-STD-20-001 V4-0</p> <p>Clause 4.3.7</p> <p>Clause 4.3.8</p>	<p>Where auditor rotation is required, the rotation period may once be extended by one (1) audit.</p>
Scope of derogation	<p><input checked="" type="checkbox"/> Generic (applicable by all certification bodies and (independent) training providers)</p> <p><input type="checkbox"/> Specific (applicable only upon individual request and PSU confirmation)</p>	
References	<p>IAF ID 3: 2011: Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations</p> <p>IAF MD 4: 2018: The Use of Information and Communication Technology (ICT) for Auditing/ Assessment Purposes</p>	
Approval date	<p>23 April 2020; last amended 14 April 2022</p>	
Period of validity	<p>Until 31 December 2022, unless invalidated prior to that date.</p> <p>FSC monitors the global development of the pandemic of novel coronavirus (COVID-19) and will update or invalidate the derogation in full or in part, as necessary.</p>	

PART III – POLICY RESPONSES TO COC CERTIFICATION REQUIREMENTS

Generic derogations

Use of Virgin Fibre in FSC Recycled Products

Code	FSC-DER-2020-003
Status	Withdrawn

Reducing the labelling threshold for FSC Mix Percentage products in the timber, furniture and construction industry

Code	FSC-DER-2020-006
Status	Withdrawn

Interpretations

Internal audits of Participating Sites

Code	INT-STD-40-003_05
Requirement (s)	FSC-STD-40-003 V2-1 Clause 5.3.5
Publication date	20 March 2020; last amended 14 April 2022 Effective from the date of publication until 31 December 2022, or until invalidated prior to that date. This interpretation will be updated as necessary.

Clause 5.3.5 offers the option that Central Offices may conduct internal audits of Participating Sites as desk audits (remote audits) under certain circumstances. Would the coronavirus (COVID-19) pandemic, that places travel restrictions on many areas of the world, also be considered a circumstance in which desk audits (remote audits) would be justifiable?

1. Yes, the coronavirus (COVID-19) pandemic does justify applying the option of desk audits (remote audits) as per Clause 5.3.5 for all types of participating sites, provided that:
 - a. the Participating Site is in an area with a health risk (demonstrated through verifiable public sources, e.g. official travel warnings or restrictions) due to coronavirus, or
 - b. Central Office auditors are prevented from conducting an on-site audit due to travel restrictions imposed by organizational (certificate holder/Central Office) health and safety policies or public authorities.
2. In addition to the option of conducting the internal audit as desk audits (remote audits), the Central Office may also consider postponing the internal audit, but not beyond the end of 2020.
3. For new applicant sites, the initial internal audit may be replaced by desk (remote) audits in cases:
 - a. the new applicant sites are already meeting the existing requirements of Clause 5.3.5, or
 - b. the Central Office and the applicant sites meet the requirements specified in FSC-DER-2020-005 then the initial internal audit may be replaced by desk (remote) audits.

4. The Central Office shall retain documented evidence for each case where this interpretation has been applied.
5. As soon as travel restrictions have been lifted, internal audits shall be conducted as per regular audit procedures.



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