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REPORT

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CONTENTS

1. EXECUTIVE SUMMARY

This report summarizes an evaluation of the coverage of established sustainability, assurance and governance criteria by ten selected certification frameworks aimed at promoting sustainability across

various sectors. As global demand for responsible environmental, social, and economic practices continues to grow, the role of Certification and Sustainability Labels (CSLs) becomes increasingly vital. This report employs a tailored methodology to systematically assess each CSL against established sustainability criteria. This methodology is based on the Comparative Benchmark Tool (CBT) which was developed for the HARMONITOR project.

Key Insights:

Strengths: Most certification frameworks exhibit strong adherence to fundamental human rights standards, including the prevention of child labour and discrimination. Many also incorporate sound environmental practices that prioritize the protection of ecosystems, careful waste management, and efforts to reduce pollution. The assurance dimension focuses on the competence, impartiality, and auditing rigor of the Certification Bodies responsible for verifying compliance. Across the evaluated schemes, impartiality is generally well-established, reflecting a common understanding that reliable, unbiased audits are essential to maintaining credibility and stakeholder trust. Many CSLs already incorporate transparency measures, consult stakeholders, and refer to recognized international conventions and treaties, indicating a baseline commitment to global sustainability norms. Impartiality at the governance level also tends to be strong, ensuring that scheme owners do not unduly influence certification outcomes.

Weaknesses: Certain criteria remain consistently underdeveloped across multiple CSLs. For instance, climate change adaptation—an increasingly urgent priority—is frequently addressed only partially, if at all. Similarly, secure land tenure and other relevant legality requirements are not always subjected to systematic verification, and instead may be referenced only in broad, general terms. While many schemes ensure basic auditor qualifications and impartial processes, some lack clear, robust auditing protocols or risk-based approaches for identifying and addressing the most significant environmental and social issues. There remain opportunities for improving governance too. Certain schemes lack comprehensive oversight mechanisms and rigorous monitoring, evaluation, and learning (MEL) frameworks.

In addition to these findings, the report highlights the implications of the European Union's Deforestation Regulation (EUDR). The EUDR mandates that products entering the EU market must not contribute to deforestation or forest degradation, and it lays out clear definitions and requirements—covering issues like conversion, degradation, and legality—that are critical for assessing how well certification schemes align with these regulatory benchmarks. This regulation poses both challenges and opportunities for CSLs. While it encourages certification schemes to enhance their standards related to deforestation-free supply chains, it also necessitates that they adapt quickly to comply with demanding EU requirements. With the recent decision to postpone the EUDR's implementation by one year, certification frameworks now have a brief but valuable window to strengthen their criteria and align with these evolving requirements.

Stakeholder consultation informed the analysis, offering insights into the effectiveness, credibility, and transparency of CSL processes. These consultations emphasize the importance of increasing transparency, strengthening accountability, and improving assurance mechanisms to bolster trust among producers, consumers, and regulators.

2. INTRODUCTION

The HARMONITOR report "D4.2 Detailed Analysis of Certification Schemes and Labels (CSLs)" provides a comprehensive examination of various certification frameworks aimed at promoting sustainability across multiple sectors. As global awareness of environmental, social, and economic challenges continues to grow, the role of CSLs in ensuring responsible practices has never been more critical. This report focuses on ten selected CSLs, evaluating their effectiveness in addressing key sustainability issues and examining their underlying governance structures. While D4.2 did not involve stakeholder feedback and evaluated criteria as they stood at that time, D4.3 incorporates insights from scheme owner input and reflects the latest changes resulting from the European Union's Deforestation Regulation (EUDR).

The analysis is grounded in a robust methodology that utilizes the Comparative Benchmark Tool (CBT) developed for the HARMONITOR project (see Appendix A for a detailed overview of sustainability, assurance and governance indicators covered by the CBT). This tool enables a systematic comparison of the selected schemes against established sustainability criteria, ensuring a thorough understanding of their respective strengths and weaknesses. The findings draw upon extensive literature reviews, stakeholder consultations, and participatory workshops with experts in sustainability governance.

In addition to evaluating individual CSLs, this report synthesizes insights into how these schemes function collectively. By identifying common trends and gaps across the certification landscape, it provides actionable recommendations for enhancing the effectiveness of CSLs. In doing so, this analysis contributes to the ongoing dialogue on improving sustainability assurance and governance practices within the bioeconomy sector and beyond.

This report, together with D4.2, has also informed the BioBasedCert cluster, which is currently developing a Bio-based Monitoring Tool (BMT) for certification systems and labels. Although the BMT covers some of the same criteria and indicators as the CBT, it employs a different scoring approach and places more emphasis on measuring the outcomes that CSLs aim to achieve. In 2024, the project partners working on the BMT conducted tests with various certification schemes, some of which overlap with those assessed in D4.2 and D4.3. While D4.2, D4.3, and the BMT each follow distinct methodologies and focus on different objectives, the results should be viewed as complementary rather than conflicting. Collectively, these efforts offer a richer, more nuanced understanding of sustainability certification, ensuring that stakeholders can draw on multiple perspectives to inform continual improvement.

3. NOTES ON THE BENCHMARKING METHODOLOGY

The methodology used in this project was tailored specifically to meet the objectives of assessing and benchmarking Certification Schemes and Labels (CSLs) related to sustainability assurance and governance of the schemes. The core approach involved developing the Comparative Benchmark Tool (CBT), which was based on principles outlined in the HARMONITOR D2.3 Methodology Handbook. This framework was designed to ensure that the assessment captured not only the technical compliance aspects of sustainability but also incorporated a holistic evaluation of governance standards.

Initially, a draft framework covering all relevant sustainability, assurance and governance indicators was constructed through an extensive review of existing literature, compiled in an inventory of 22 CSLs in Deliverable D4.1 Literature Review and inventory of certification schemes and labels requirements. This ensured that key sustainability, assurance, and governance indicators were incorporated to form a robust basis for evaluation. The design of the CBT was not arbitrary but was collaboratively refined during a workshop held in September 2023, involving experts in sustainability governance. This participatory approach also contributed to ensuring that the tool was aligned to the nuances of the bioeconomy sector, with input from a broad range of stakeholders adding relevance to the selected criteria.

The next phase of the methodology development involved transferring the CBT into an Excel-based version, enabling systematic and replicable analysis of the ten selected CSLs. Each scheme was assigned a dedicated section within these sheets, and indicators were applied systematically to assess their performance across sustainability, assurance, and governance dimensions. This process was not merely a technical exercise but involved critical assessments to ensure that the tool captured the complexities of different national and sectoral contexts.

The benchmarking itself was performed using the CBT as the comparative framework. Each CSL was examined against the established criteria to highlight the extent of its coverage, focusing on both strengths and gaps. Although certain limitations were identified, such as the challenges posed by varying national standards, the methodology was flexible enough to accommodate these variations without compromising the integrity of the overall analysis.

A crucial part of the methodology was the classification of the benchmarking results, which allowed for a nuanced understanding of the coverage of indicators across the schemes. This classification system was visually represented using a color-coded approach, ensuring clarity in identifying where CSLs fully, partially, or insufficiently met the assessment criteria.

This methodology was distinct to this project as it ensured a balance between quantitative rigor—through the structured application of the CBT—and qualitative insight gained from the collaborative development process. The structured but adaptable nature of the methodology made it uniquely suited to the HARMONITOR project's goal of enhancing the sustainability of bio-based systems through a thorough examination of certification schemes and their governance structures.

4. SUMMARY OF THE STAKEHOLDER CONSULTATION PROCESS

To ensure a comprehensive and balanced evaluation, feedback from scheme owners was obtained through a structured and transparent process. Each scheme owner was presented with a benchmarking analysis and given a clear opportunity to review and comment on the conclusions. The feedback window, opened in April 2024, allowed several months for careful consideration. Of the ten scheme owners contacted, seven responded and provided feedback on specific indicators.

The feedback from scheme owners primarily focused on indicators initially classified as "partly" met or "missing." They often challenged these conclusions by referencing documentation, revised standards, or other clarifying materials. Where appropriate, these new insights led to adjustments in the indicator

classifications. In some cases, indicators previously marked as “partly” met were upgraded to “intent covered” or even “fully covered” once the supporting evidence was verified. Conversely, if the additional documentation did not substantively change the initial assessment, the original classification remained.

In addition to requesting reclassifications, scheme owners also sought further explanation for certain outcomes. This prompted the evaluation team to clarify the thresholds and criteria used to determine whether an indicator was considered “partly,” “missing,” or otherwise.

Compared to the earlier results in report D4.2—which relied solely on documentation available at that time—this process integrated the latest information, including updates influenced by the European Union’s Deforestation Regulation (EUDR). The inclusion of scheme owner feedback and recent developments allowed for a more accurate and nuanced final evaluation. The review process ensured that each scheme’s performance was represented as fairly and accurately as possible.

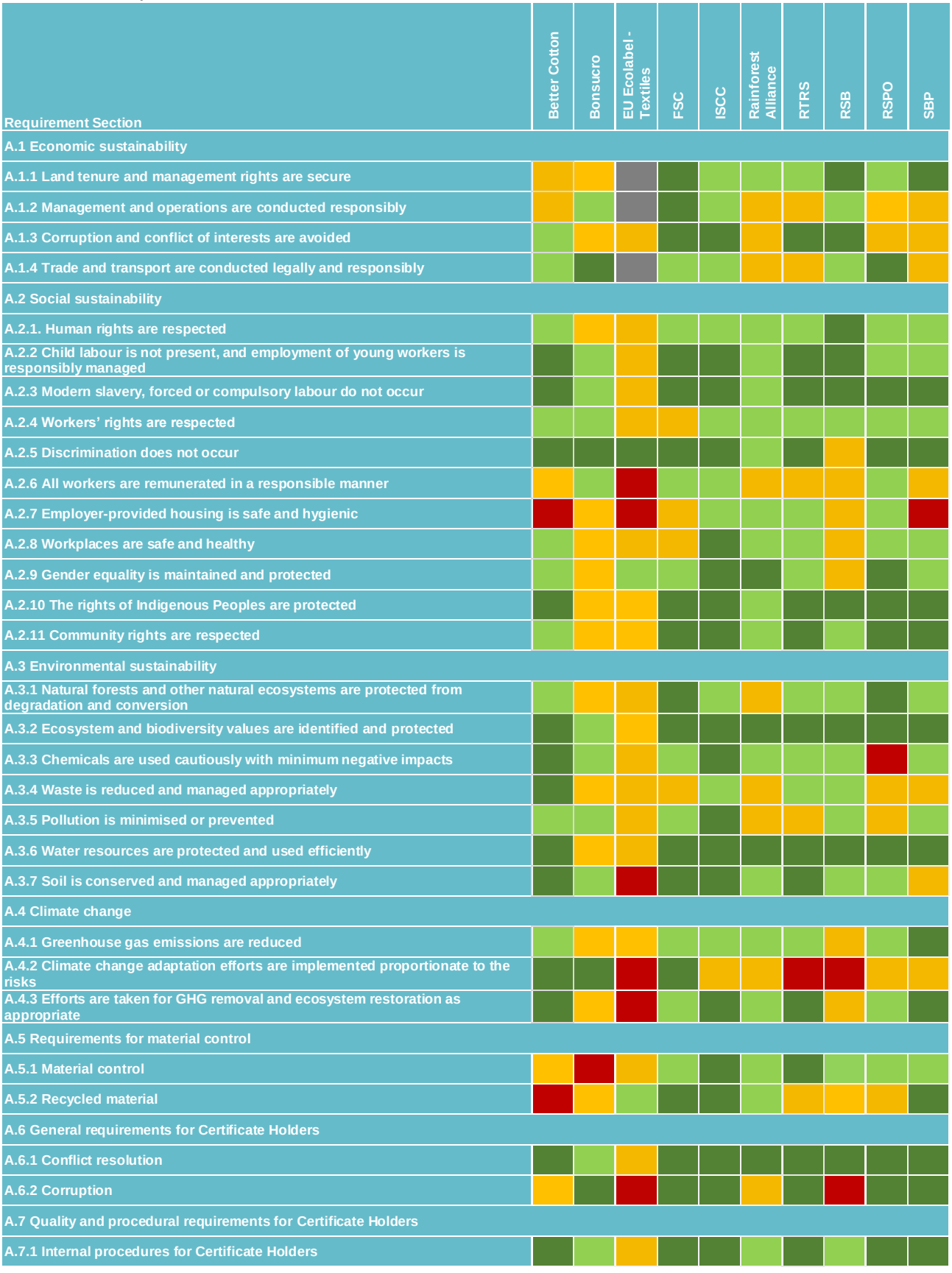
As these certification schemes continue to evolve, dialogues like these will remain essential. They help clarify criteria, encourage continuous improvement, and ensure that sustainability certifications reflect best practices considering emerging legislation and stakeholder expectations.

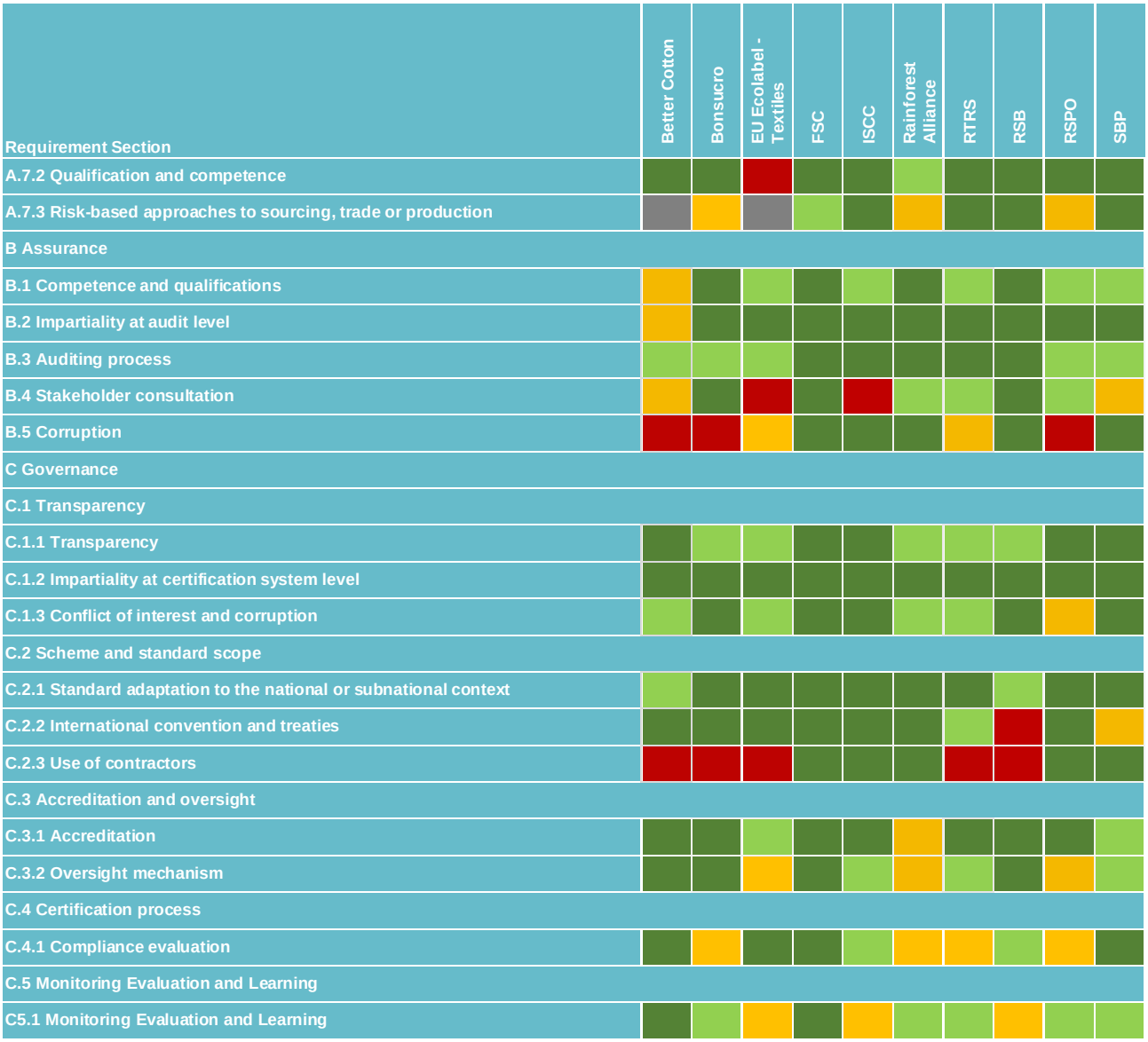
It is important to note that this analysis evaluates certification schemes based on their documented standards and frameworks. This analysis does not assess actual compliance or impact. Stakeholders with concerns about specific practices should engage directly with the relevant certification bodies, which typically maintain grievance mechanisms and compliance reporting channels. Independent verification of claims and direct communication with certification schemes remain essential for addressing potential violations of standards.

5. SUMMARY OF THE COMPARATIVE ANALYSIS

This section provides a summary of the findings from the D4.2 report for each of the ten selected Certification Schemes and Labels (CSLs). Table 1 below summarizes the results for each criterion evaluated for every CSL.

Table 1. Overview of certification scheme assessment findings (see findings for individual schemes below for details).





Dark green: Fully covered. Light green: Intent covered. Orange: Partly covered. Red: Not covered. Gray: Not applicable

The evaluation focuses on their performance across key sustainability topics—environmental, social, and economic—along with their approach and requirements related to assurance and governance.

The analysis below highlights both strengths and weaknesses of each CSL, providing a summary and view on the overall effectiveness of each scheme in addressing global sustainability challenges.

5.1 EU Ecolabel – textiles

The EU Ecolabel is a voluntary certification scheme that evaluates the environmental performance of textile products across their entire lifecycle, from raw material extraction to disposal. The label is recognized for its stringent environmental criteria.

- **Strengths**: The EU Ecolabel stands out in its comprehensive coverage of **environmental issues**, particularly in controlling **wastewater pollution**, promoting **water management**, and restricting the

use of harmful chemicals and ozone-depleting substances (ODS). The EU Ecolabel's assessments are conducted for specific product groups, and results for one product group, cannot be transferred to others. Its focus on reducing pollution makes it a reliable standard for environmental performance.

- **Weaknesses**: Despite its strong environmental coverage, the scheme demonstrates gaps in **economic sustainability**, particularly in terms of addressing **land tenure rights** and **labour rights**. EU Ecolabel refers to ILO Core Labour Standards for the purpose of verification of fundamental principles and rights at work. However, the reference does not guarantee a systematic verification of all relevant social requirements as listed in the evaluation framework. More specifically, **responsible remuneration** and **employer-provided housing** are underrepresented.

5.2 Forest Stewardship Council (FSC)

The FSC is a leading certification for sustainable forest management, aiming to promote environmentally sound, socially beneficial, and economically viable management of the world's forests.

- **Strengths**: **FSC** scores high in all major sustainability areas, making it one of the most complete certifications in terms of coverage. It fully addresses critical issues such as **land tenure and management rights, Indigenous Peoples' rights**, and **Free, Prior, and Informed Consent (**FPIC), ensuring that communities are actively involved in land management decisions. FSC also emphasizes **chemical use management, biodiversity conservation**, and preventing forest conversion, which are crucial for maintaining the integrity of forest ecosystems.

- **Weaknesses**: FSC refers to ILO Conventions and ILO Code of Practice on Safety and Health in Forestry Work, which provide extensive protections. However, it remains unclear which specific elements are evaluated in practice, particularly regarding issues related to **employer-provided housing** and the rights of **migrant workers**.

5.3 Better Cotton Initiative (BCI)

The Better Cotton Initiative promotes sustainable cotton farming practices worldwide, aiming to improve the social, environmental, and economic conditions in cotton-growing regions.

- **Strengths**: **BCI** excels in its **social criteria,** with comprehensive coverage of key areas such as **child labour prevention, anti-discrimination**, and adherence to international **labour conventions**. It also includes **monitoring and evaluation system** to track progress, with regular performance and impact assessments ensuring that certified entities adhere to established sustainability standards. Additionally, it promotes emissions-reducing practices, supporting farmers in adapting to climate change and improving soil health through regenerative agriculture.

- **Weaknesses**: **BCI** has gaps in addressing **decent remuneration** and **employer-provided housing,** key issues in many cotton-growing regions where labour exploitation is prevalent. Furthermore, the scheme lacks a robust framework for **corruption prevention** and does not fully address the **competence of personnel** involved in second-party evaluations. The sustainability initiative is transitioning to a certification scheme, meaning its second-party licensing assessments will discontinue, potentially strengthening robustness in the mentioned areas.

5.4 Bonsucro

Bonsucro is a global sustainability standard for sugarcane production, addressing social, environmental, and economic sustainability within the sugarcane sector.

- **Strengths**: **Bonsucro** excels in areas related to **workers' rights**, **non-discrimination**, and **biodiversity** protection, making it a strong performer in both social and environmental sustainability. The scheme's governance framework is robust, with well-established **auditing protocols** and a reliable **accreditation system** that ensures competent auditors are in place.
- **Weaknesses**: However, the scheme falls short in several areas, particularly in its handling of **land tenure** and **Indigenous Peoples' rights**, where it provides only partial coverage. **Corruption prevention** is another gap, as the scheme lacks stringent measures to prevent unethical practices in the certification process. Furthermore, Bonsucro does not provide clear guidelines on unannounced audits or climate change adaptation, leaving room for improvement in these areas.

5.5 International Sustainability and Carbon Certification (ISCC)

ISCC certification is a global standard focused on sustainability in biofuels and bioenergy, promoting deforestation-free and climate-friendly supply chains.

- **Strengths**: The ISCC stands out in its strong emphasis on land use change prevention, deforestation avoidance, and comprehensive **traceability** throughout the supply chain. It has a robust **governance structure**, ensuring transparency and high standards in its certification processes. **Corruption prevention** measures are also well-covered within the scheme's framework, offering safeguards against conflicts of interest.
- **Weaknesses**: The scheme does not adequately address **climate change adaptation**, which is increasingly critical in the bioenergy sector. The audit process does not require stakeholder consultation, which could undermine accountability.

5.6 Rainforest Alliance (RA)

The **Rainforest Alliance** certification promotes sustainable agricultural practices, focusing on protecting the environment, improving the livelihoods of farmers, and supporting rural communities.

- **Strengths**: The Rainforest Alliance is a strong performer in **biodiversity conservation**, with comprehensive criteria for protecting ecosystems, managing soil and water resources, and reducing greenhouse gas emissions. It also places significant emphasis on **social equity**, particularly in safeguarding **human rights** and ensuring **workplace safety**.
- **Weaknesses**: Despite these strengths, the scheme does not provide sufficient coverage for **climate change adaptation**, leaving certified farmers without clear strategies for dealing with the long-term impacts of climate change. The scheme also lacks strong measures for a systematic check of specific legal requirements. **Employer-provided housing** is another area where the certification falls short.

5.7 Roundtable on Sustainable Palm Oil (RSPO)

RSPO certification aims to make palm oil production more sustainable by ensuring minimal environmental and social impacts throughout the production process.

- **Strengths**: The RSPO is particularly strong in its provisions for biodiversity conservation, deforestation prevention, and Indigenous **Peoples' rights**. It also has a well-defined approach to **land tenure** and **chemical use**, ensuring that palm oil production does not contribute to significant environmental degradation or harm to local communities.
- **Weaknesses**: However, **climate change** adaptation remains underdeveloped in the RSPO criteria. The scheme also has gaps in corruption prevention, conflict **of interest management**, and **employer-provided housing**, all of which are critical for ensuring social sustainability and fairness throughout the supply chain.

5.8 Responsible Soy (RTRS)

RTRS focuses on promoting sustainable soy production, aiming to balance environmental, social, and economic sustainability concerns in soy-growing regions.

- **Strengths**: The **RTRS** performs well in **biodiversity conservation, land tenure rights,** and **worker safety,** with a strong emphasis on **deforestation-free soy**. The scheme aligns with international labour conventions, ensuring that workers are treated fairly and that environmental impacts are minimized.
- **Weaknesses**: However, the scheme shows significant gaps in **climate change adaptation**, failing to provide detailed criteria on how soy producers can adapt to environmental changes. Corruption prevention management is also weak points for the RTRS at the assurance and governance levels.

5.9 Roundtable on Sustainable Biomaterials (RSB)

The RSB certification covers bio-based industries, promoting sustainability in biofuels and biomaterials through rigorous social, environmental, and economic standards.

- **Strengths**: The RSB performs particularly well in addressing greenhouse gas emissions reductions, biodiversity protection, and **land tenure rights**. It also provides a robust **chain of custody certification process**, ensuring that bio-based materials are traceable and sustainable throughout the supply chain.
- **Weaknesses**: **Climate change adaptation** is not fully integrated into the RSB's criteria, reducing its ability to promote long-term resilience in bio-based industries. The scheme also shows gaps in **employer-provided housing**, **stakeholder consultation** and fails to comprehensively address **corruption prevention**.

5.10 Sustainable Biomass Program (SBP)

The SBP focuses on the sustainable use of biomass for energy production, particularly in the forestry and energy sectors.

- **Strengths**: SBP demonstrates strong performance in deforestation prevention, greenhouse gas emissions reductions, and **traceability**, ensuring that biomass production complies with environmental sustainability standards. It also provides strong protections for **land tenure and management rights.**
- **Weaknesses**: However, SBP has significant gaps in addressing climate change adaptation, corruption prevention, migrant worker rights and employer-provided housing.

6. SUMMARY OF SCHEME PERFORMANCE

This section includes a summary of how the ten selected Certification Schemes and Labels (CSLs) perform collectively across various sustainability, assurance, and governance dimensions.

The assessment is based on the findings of the Comparative Benchmark Tool (CBT), which was developed specifically for this project. The tool evaluates CSLs on criteria related to economic, social, and environmental sustainability, as well as their assurance and governance frameworks (see Table 1 for an overview of criteria). The following analysis highlights both the strengths and weaknesses of the CSLs, identifying areas where these schemes perform well and where improvements are needed.

The summary of results is applicable to the evaluation conducted based on the desktop research, standards available, and consultation done at the time of completing this report. Organizations using certification schemes for sustainable sourcing must understand that these tools support, but do not replace, their responsibility for due diligence. As regulations, market requirements, and industry best practices evolve, certifications adapt, but organizations must independently verify that their sustainability goals and regulatory obligations are met.

6.1 Economic sustainability

Economic sustainability is important in many certification schemes, focusing on the long-term viability and fairness of economic practices within certified entities. Across the board, the CSLs show strong performance in securing **land tenure and management rights**. This is a critical area, especially in sectors like agriculture and forestry, where disputes over land use can lead to significant legal and environmental challenges. By ensuring that land tenure is legally recognised and management rights are secured, these schemes play an essential role in promoting responsible land stewardship. For example, the Forest Stewardship Council (FSC) has a well-developed framework for securing land rights, ensuring that certified forests are managed in ways that respect both local communities and legal standards.

In addition to land rights, the CSLs collectively emphasize the **responsibility in trade and transport** activities. These schemes generally require that trade operations be conducted legally and in a transparent manner, ensuring that supply chains are not only sustainable but also compliant with national and international regulations. This is particularly well-addressed in the International Sustainability & Carbon Certification (ISCC) scheme, which places stringent requirements on the legality of biomass trade and transport. Such robust legal frameworks contribute to the schemes' credibility in fostering responsible economic activities.

However, there are notable gaps in **corruption prevention** and **conflict of interest management**, which are only partially addressed by many schemes. While some schemes, like Bonsucro, include measures to prevent conflicts of interest within certification bodies, other schemes fail to address corruption at all levels comprehensively. The absence of clear anti-corruption measures in certification processes presents risks, as it undermines the credibility and reliability of the certifications granted. This gap is significant, especially in regions or sectors where corruption in land acquisition and resource management can pose serious ethical and legal challenges.

6.2 Social sustainability

In terms of social sustainability, the CSLs includes detailed requirements in key areas such as **human rights protection, worker safety, and gender equality**. Most schemes include comprehensive coverage of issues such as **child labour, modern slavery**, and **discrimination**. For instance, the Rainforest Alliance, a certification that operates in agricultural sectors, imposes stringent requirements on ensuring safe working conditions, prohibiting child labour, and promoting gender equality. Specific scheme requirements align with international labour standards, such as those set by the International Labour Organization (ILO), which strengthens their ability to protect vulnerable populations in high-risk industries.

One of the standout areas where the CSLs excel is in ensuring **workplace health and safety**. Most schemes include detailed requirements for worker protection, particularly in hazardous industries like agriculture and textiles. Better Cotton, for example, mandates safe working environments for farmworkers and includes provisions for the proper use of chemicals and machinery. Such requirements are crucial in reducing workplace injuries and fostering environments where workers' rights are protected.

Nevertheless, the analysis reveals significant gaps in **responsible remuneration** and **employer-provided housing**. Many schemes only partially address these areas, leaving room for improvement. Most schemes require minimum wage as the main standard and only a few, like Bonsucro and RSPO, have raised the bar to living wage benchmarks. In sectors such as agriculture, where seasonal labour is common, workers are often provided with housing by employers. However, most CSLs do not have stringent requirements for the quality of this housing, leading to potential risks for workers. The lack of clear requirements for **fair wages** and **safe, hygienic living conditions** is a significant oversight, particularly in sectors where exploitation of labour can occur. The Responsible Soy (RTRS) certification, for example, does not fully cover provisions for fair remuneration, reflecting a gap that is common across multiple CSLs.

6.3 Environmental sustainability

Environmental sustainability is one of the strongest areas of performance across the CSLs, with many schemes demonstrating a high level of commitment to ecosystem preservation, pollution control, and biodiversity protection. The **protection of natural ecosystems and biodiversity** is a priority for most schemes, particularly those operating in sectors such as forestry and agriculture, where environmental degradation is a significant risk. The Roundtable on Sustainable Palm Oil (RSPO), for instance, includes comprehensive criteria for protecting high conservation value (HCV) areas, ensuring that palm oil production does not contribute to deforestation or habitat destruction.

Another area where the schemes excel is in the **management of water resources and soil conservation**. Many CSLs have implemented requirements to protect water bodies from contamination, manage soil fertility, and reduce greenhouse gas (GHG) emissions. The Roundtable on Sustainable Biomaterials (RSB), for example, has strong environmental safeguards that include both water resource protection and GHG mitigation strategies. Such initiatives are critical for reducing the environmental impact of industrial activities and promoting sustainability in resource-intensive sectors.

However, the CSLs generally underperform in the area of **climate change adaptation, and several also have limited requirements related to GHG emission reduction.** While some schemes include provisions for reducing greenhouse gas emissions, fewer provide clear guidance on how certified entities should adapt to the risks posed by climate change. This gap is particularly evident in sectors such as agriculture and forestry, where climate impacts can significantly alter production practices. The absence of strong adaptation measures limits the schemes' ability to contribute to long-term environmental resilience. For example, while schemes like the EU Ecolabel address climate impacts in a general sense, they lack detailed adaptation frameworks to guide certified entities in preparing for future climate risks.

6.4 Assurance

In terms of **assurance**, the CSLs generally perform well, especially in areas like **auditing** and **stakeholder consultation**. Most schemes have robust auditing processes that include both third-party assessments and periodic evaluations of compliance. The Forest Stewardship Council (FSC), for instance, employs a comprehensive auditing system that includes both scheduled and unannounced audits to ensure that certified entities maintain high standards. This level of assurance is critical for maintaining the credibility of the certification process and ensuring that certified entities continue to meet the necessary sustainability criteria.

Stakeholder consultation is another area where most CSLs are doing well. Many schemes include formalized processes for engaging with stakeholders, including local communities, civil society, and industry experts. This is particularly important in ensuring that certification schemes remain transparent and responsive to the needs of those impacted by certification activities. The Rainforest Alliance is one of the stronger performers in this area, offering a clear framework for stakeholder engagement that includes consultations with local communities, workers, and environmental experts during the certification process.

However, gaps remain in the **competence and qualifications of auditors**. While many schemes provide general guidance on the auditing process, fewer ensure that auditors are sufficiently trained in specialized

areas like social sustainability or legal compliance. This is a significant oversight, as the effectiveness of an audit depends heavily on the competence of the individuals conducting it. In some cases, schemes like Better Cotton have been found to have only partial coverage of the qualifications required for all of the personnel involved in auditing, which weakens the overall assurance framework.

6.5 Governance

Governance structures within the CSLs are generally robust, particularly in areas such as **transparency** and **impartiality**. According to the detailed CSL review, most schemes have well-defined governance frameworks that ensure the impartiality of the certification process and the transparency of decision-making. This is crucial for building trust in the certification process, particularly for stakeholders such as consumers and industry actors who rely on certification as a marker of sustainability. For example, Bonsucro has a strong governance framework that ensures both transparency and impartiality throughout its certification process, providing a high level of confidence in the scheme's legitimacy.

Despite these strengths, significant gaps exist in the governance of **corruption prevention** and **conflict of interest management**. Many schemes fail to provide comprehensive frameworks for addressing these issues, which poses a risk to the integrity of the certification process. The absence of strong anti-corruption measures, particularly at the certification holder level, undermines the credibility of some schemes. For instance, while the Forest Stewardship Council (FSC) has mechanisms to prevent conflicts of interest within certification bodies, it lacks detailed requirements for preventing corruption at the certificate holder level, which is a common issue across many schemes.

Additionally, **accreditation and oversight mechanisms** are often incomplete. While most schemes include basic accreditation processes, few provide detailed frameworks for ongoing monitoring and evaluation of certified entities. This limits the ability of certification schemes to track long-term compliance and assess the impact of certification on sustainability outcomes. The Better Cotton Initiative, for instance, has a relatively strong accreditation framework but lacks comprehensive oversight mechanisms to ensure continued compliance beyond the initial certification.

6.6 Key areas of underperformance

While the Certification Schemes and Labels (CSLs) analysed in this report demonstrate notable strengths, there are several significant areas of underperformance that may limit their ability to fully promote sustainable practices across economic, social, and environmental dimensions. These gaps represent critical challenges in ensuring the credibility, effectiveness, and comprehensive coverage of sustainability within certified entities. Below, we explore the key areas where CSLs, as a group, fail to meet the necessary standards, providing specific examples and examining the broader implications of these weaknesses.

6.6.1 Climate Change Adaptation

One of the most obvious gaps across almost all the CSLs is their lack of emphasis on **climate change adaptation**. While reducing greenhouse gas emissions (mitigation) is an essential part of many schemes, few CSLs incorporate robust measures or clear frameworks for adaptation. As climate change increasingly impacts ecosystems, agriculture, and supply chains, it is essential for certification schemes to ensure that

certified entities are not only mitigating their contributions to climate change but are also prepared to adapt to the challenges it presents.

For example, although the **RTRS** includes broad environmental sustainability goals, it lacks detailed criteria guiding certified entities in identifying risks and implementing climate adaptation strategies, such as changes in crop practices in response to shifting weather patterns. Similarly, the **EU Ecolabel**, while comprehensive in its environmental safeguards, does not adequately address how certified organizations can incorporate adaptation measures into their operational strategies. This oversight is particularly concerning in sectors like agriculture and forestry, where climate impacts, such as shifting growing seasons or increased pest pressures, are already evident and are expected to intensify.

The absence of specific adaptation criteria undermines the long-term sustainability and resilience of certified entities, particularly in vulnerable sectors. By failing to incorporate climate adaptation strategies, CSLs risk certifying operations that may be ill-prepared for the evolving environmental challenges they will face, which could lead to future sustainability failures.

6.6.2 Corruption Prevention and Conflict of Interest Management

Another area where most CSLs underperform is in their **corruption prevention** and **conflict of interest management** frameworks. Despite the critical importance of ensuring integrity in certification processes, many schemes provide either incomplete or no measures at all to prevent corruption and manage conflicts of interest. This issue is essential in global supply chains because it helps preserve credibility, ensure assessment integrity, maintain regulatory compliance, and mitigate risks.

For instance, while the **Forest Stewardship Council (FSC)** provides mechanisms to prevent conflicts of interest within certification bodies, it lacks comprehensive requirements at the certification holder level, leaving space for potential conflicts that could undermine the validity of certification decisions. Furthermore, some CSLs, such as **Better Cotton**, provide only minimal coverage of anti-corruption measures, focusing primarily on the certification bodies without extending sufficient protections to the certified entities themselves.

Corruption and conflict of interest risks are particularly concerning in sectors like palm oil, soy, and forestry, where resource competition and land rights disputes can create opportunities for unethical practices. The failure of CSLs to implement stringent anti-corruption and conflict of interest protocols compromises the credibility of the certification process, as stakeholders may question the impartiality and integrity of the decisions being made. Strengthening these areas is vital to building trust in the certification schemes and ensuring that the certified entities are truly committed to sustainable practices rather than merely using certification as a marketing tool.

6.6.3 Responsible Remuneration and Employer-provided Housing

In relation to the social dimension of sustainability many CSLs underperform, in terms of **responsible remuneration** and **employer-provided housing**. While the CSLs tend to perform well in addressing critical issues like child labour and workplace safety, they often fall short when it comes to ensuring fair wages and adequate housing for workers, especially in sectors that rely heavily on seasonal or migrant labour.

For example, the **Responsible Soy (RTRS)** certification includes provisions for fair labour practices but lacks detailed requirements to ensure that workers are paid a living wage. This gap is especially significant in regions where agricultural labour is often undervalued, leading to systemic underpayment of workers. Additionally, while some schemes touch on the issue of employer-provided housing, most do not offer stringent standards for ensuring that the housing provided is safe, hygienic, and adequate for long-term occupancy.

In sectors such as agriculture, where workers are often housed in employer-provided accommodations, the lack of clear guidelines can lead to substandard living conditions, exacerbating social inequalities and undermining the social sustainability objectives of the certification schemes. The absence of strong requirements for responsible remuneration and adequate housing is a major oversight, particularly in industries that are known for labour exploitation. Addressing these gaps is crucial for ensuring that the social benefits of certification schemes extend to the workers on the ground, rather than remaining confined to higher-level corporate practices.

6.6.4 Recycled Materials and Risk-Based Sourcing Approaches

Certification Schemes and Labels (CSLs) increasingly need to address two distinct but complementary sustainable sourcing strategies: recycled material utilization and risk-based sourcing. Each strategy requires specific verification methodologies to ensure effectiveness and credibility.

Recycled materials require chain of custody verification to confirm their recycled status and prevent fraudulent claims. This verification tracks materials from collection through processing and ultimately to the final product.

Risk-based sourcing approaches involve systematically identifying, assessing, and mitigating specific sustainability risks when sourcing materials from regions or suppliers where environmental or social concerns exist.

The push for more sustainable production and consumption patterns requires addressing not only the responsible use of virgin materials but also encouraging recycled and reclaimed materials wherever feasible and appropriate. Our analysis reveals significant gaps in how CSLs address these strategies:

Varied approaches to material efficiency: Many certification schemes prioritize different aspects of the waste hierarchy ("reduce, reuse, recycle"). For instance, the EU Ecolabel effectively addresses reduction of environmental impacts through lifecycle assessment, focusing on the critical "reduce" component. However, the inclusion of recycled fibres or materials in textile production is not addressed.

Context-specific sustainability priorities: Certification schemes must balance multiple sustainability objectives based on sector-specific contexts. For example, while the Sustainable Biomass Program (SBP) primarily focuses on ensuring biomass is renewably sourced - already addressing fossil fuel replacement - there may be opportunities to further enhance sustainability through the recognition of recycled or reclaimed materials in the certification system.

Underdeveloped risk-based frameworks: Risk-based sourcing approaches remain underdeveloped in many certification systems. The lack of emphasis on risk-based approaches limits the ability of CSLs to respond to

region-specific or commodity-specific sustainability risks, such as deforestation in high-risk areas or human rights abuses in conflict zones.

Incorporating stronger criteria for recycled materials and risk-based sourcing would significantly enhance the impact of these certification schemes by promoting more sustainable resource use and better risk management in global supply chains.

6.6.5 Accreditation, Oversight, and Monitoring

Finally, many CSLs underperform in the areas of **accreditation**, **oversight**, and **monitoring**, which are critical for ensuring the long-term effectiveness and credibility of the certification process. While most schemes have basic accreditation processes in place, few provide detailed frameworks for ongoing monitoring and evaluation of certified entities. This lack of comprehensive oversight mechanisms creates a risk that certified entities may not maintain compliance with sustainability criteria over time. Without robust monitoring processes, there is little assurance that certified entities are maintaining the sustainability practices that earned them certification in the first place.

Additionally, schemes that do not implement regular external audits or follow-up evaluations risk certifying entities that may degrade their sustainability practices over time, either due to changing economic pressures or insufficient internal capacity to maintain compliance. Strengthening accreditation, oversight, and monitoring processes is essential for ensuring that CSLs can deliver on their promises of long-term sustainability and accountability.

7. CSLS IN RELATION TO THE EU DEFORESTATION REGULATION

The European Deforestation Regulation (EUDR) imposes requirements on companies (called Operators) who place products on the EU market that are associated with deforestation risks. This chapter was added due to its current policy relevance. As the newest regulation, it reflects the latest efforts to address deforestation, with schemes and requirements that are still evolving. Unlike the Renewable Energy Directive III (REDIII), which recognizes certification schemes that comply with its criteria, the EUDR does not provide a “green light” for compliance based solely on certification. This makes it crucial to evaluate how these schemes align with the regulation's goals.

The regulation requires Operators to implement due diligence processes to ensure that the products they place on the EU market do not contribute to deforestation or forest degradation. The primary obligations are that operators must ensure that products are deforestation-free and are produced according to relevant legislation.

Traceability is another central pillar of the EUDR. Operators must provide geolocation data that can verify the exact location where the products, or the raw materials they are derived from, were produced. This is necessary to demonstrate that the products comply with the deforestation-free requirement. Additionally, operators must be able to trace their products throughout the supply chain, ensuring that all actors in the chain adhere to the necessary standards.

7.1 Requirements of the EUDR

The EUDR requirements can be divided into the following categories that operators must address to comply with the regulation. These requirements establish clear benchmarks against which certification schemes may be evaluated for their ability to support compliance.

7.1.1 Definition of legality

The EUDR defines "relevant legislation of the country of production" as the laws applicable in the country where the commodities or products are produced. These laws must cover the following areas:

a) Land Use Rights: Laws governing the legal status of land use and ownership in the area of production.
b) Environmental Protection: Regulations related to the preservation of natural ecosystems, including forest conservation and environmental sustainability.
c) Forest-Related Rules: Rules that govern forest management, biodiversity conservation, and practices directly related to wood harvesting.
d) Third Parties' Rights: Legal protections for the rights of third parties, such as landowners, communities, or individuals affected by land use changes.
e) Labour Rights: Laws concerning workers' rights, including fair wages, working conditions, and occupational safety.
f) Human Rights: Compliance with human rights protections, particularly those safeguarded under international law.
g) Free, Prior, and Informed Consent (FPIC): Legal standards ensuring that indigenous peoples' and local communities' rights are respected, including their right to give or withhold consent for land use, as set out in the UN Declaration on the Rights of Indigenous Peoples.
h) Tax, Anti-Corruption, Trade, and Customs Regulations: Laws related to the payment of taxes, anti-corruption measures, and regulations concerning trade and customs compliance.

7.1.2 Definition of deforestation and forest degradation

To ensure that products place don the EU market are "deforestation-free" the operator needs to ensure:

a. That the relevant products contain, have been fed with or have been made using, relevant commodities that were produced on land that has not been subject to deforestation after 31 December, 2020; and
b. in the case of relevant products that contain or have been made using wood, that the wood has been harvested from the forest without inducing forest degradation after 31 December, 2020

The EUDR provides specific definitions for deforestation and forest degradation:

Deforestation:

The EUDR defines deforestation as the conversion of forest to agricultural use or to other non-forest land uses. In this context, a forest refers to an area of land of a certain size, with trees that meet specific thresholds for height and canopy cover. Under the EUDR, any activity that results in the permanent removal of forest for purposes such as agriculture, livestock farming, or urban development is considered

deforestation. The regulation aims to ensure that products entering the EU market are not linked to such activities.

Forest Degradation:

Forest degradation is defined as human-induced changes that negatively affect the structure and function of a forest, reducing its capacity to regenerate or sustain its ecological services. This could include activities like unsustainable logging, which reduces biodiversity, harms the soil, or weakens the forest's ability to recover. Forest degradation, though not a complete removal of forest cover, involves significant deterioration of the forest's quality and health, and the EUDR seeks to prevent products tied to these practices from entering the EU market.

Specifically, the EUDR define forest degradation as conversion of:

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

The CBT aligns its terminology with the EUDR definitions for consistency and practical applicability (Appendix B). Since the EUDR. Since the EUDR establishes key regulatory requirements that certification schemes may need to meet, using these same definitions in the CBT enables a direct assessment of how well certification schemes align with EUDR requirements. This alignment is particularly important for evaluating certification schemes' criteria regarding deforestation, forest degradation, and legal compliance.

7.1.3 Risk assessment

The EUDR also makes strong emphasis on risk assessments. Operators are required to assess the level of risk associated with deforestation for each product in their supply chain. This involves evaluating the country of origin, the type of commodity, and the presence of high-risk factors, such as weak governance or illegal land use. If a product is deemed to have a high risk of contributing to deforestation, operators must implement risk mitigation measures. These measures may include gathering additional information, conducting audits, or altering sourcing practices to reduce or eliminate the risks.

The risk assessment requirements of the EUDR, as quoted directly from Article 10(2) of the regulation, include the following points that must be considered:

a) the assignment of risk to the relevant country of production or parts thereof in accordance with Article 29 (country benchmarking system);
b) the presence of forests in the country of production or parts thereof;
c) the presence of indigenous peoples in the country of production or parts thereof;
d) the consultation and cooperation in good faith with indigenous peoples in the country of production or parts thereof;
e) the existence of duly reasoned claims by indigenous peoples based on objective and verifiable information regarding the use or ownership of the area used for the purpose of producing the relevant commodity;
f) prevalence of deforestation or forest degradation in the country of production or parts thereof;

g) the source, reliability, validity, and links to other available documentation of the information referred to in Article 9(1) (due diligence requirements);
h) concerns in relation to the country of production and origin or parts thereof, such as level of corruption, prevalence of document and data falsification, lack of law enforcement, violations of international human rights, armed conflict or presence of sanctions imposed by the UN Security Council or the Council of the European Union;
i) the complexity of the relevant supply chain and the stage of processing of the relevant products, in particular difficulties in connecting relevant products to the plot of land where the relevant commodities were produced;
j) the risk of circumvention of this Regulation or of mixing with relevant products of unknown origin or produced in areas where deforestation or forest degradation has occurred or is occurring;
k) conclusions of the meetings of the Commission expert groups supporting the implementation of this Regulation, as published in the Commission's expert group register;
l) substantiated concerns submitted under Article 31 (substantiated concerns from third parties), and information on the history of non-compliance of operators or traders along the relevant supply chain with this Regulation;
m) any information that would point to a risk that the relevant products are non-compliant;
n) complementary information on compliance with this Regulation, which may include information supplied by certification or other third-party verified schemes, including voluntary schemes recognised by the Commission under Article 30(5) (recognition of certification schemes) of Directive (EU) 2018/2001 of the European Parliament and of the Council, provided that the information meets the requirements set out in Article 9 (information requirements) of this Regulation.

Based on the above list several topics can be concluded to have relevance to CSLs, as the CSLs included in this study, all include requirements in these areas. We can therefore also use these to evaluate how well CSLs cover these issues required in the risk assessment.

The key areas where CSL currently have relevant requirements include:

1. issues related to indigenous people's rights – this would be relevant in CSLs by evaluating how well the CSL cover issues related to Indigenous Peoples' rights
2. the ability of the CSL to ensure reliable documentation
3. risks of corruption- this is relevant for CSLs in terms of their ability to address issues of corruption, fraud and conflicts of interest.
4. risk of mixing, which would be relevant to CSLs in terms of the type of traceability of chain of custody (CoC) system applied.

7.2 Using CSLs to manage risks and mitigation actions

In light of the requirements of the EUDR, certification schemes can serve as a valuable tool to help operators manage risks and fulfil their due diligence obligations.

However, certification alone may not be sufficient to fully meet the due diligence requirements of the EUDR. Operators are still responsible for verifying that certified products are traceable and compliant with the regulation's geolocation requirements. Certifications can be a component of a broader risk management strategy but should be supplemented with other measures, such as independent audits and supply chain mapping, to ensure full compliance.

For high-risk products or regions, certifications can be part of the risk mitigation strategy. Operators might prioritize certified suppliers to lower the risk of deforestation in their supply chains, and where risks are high, they can use certification as a signal of more reliable sourcing practices. In such cases, certification helps operators demonstrate compliance with environmental and social standards, offering a layer of assurance that risk mitigation actions are being implemented effectively.

Certification schemes can provide a useful framework for reducing deforestation and legality risks and provide supply chain traceability. However, certification should not replace other due diligence actions but rather complement them as part of a comprehensive strategy to ensure deforestation-free supply chains.

Most relevant certification schemes have revised their standards and tools to align with EU Deforestation Regulation (EUDR) requirements. While some schemes have undertaken extensive work toward alignment, others have only taken preliminary steps, with most changes appearing limited so far. It is important to highlight, schemes are still responding to feedback and official guidance to their standards. The following analysis examines the latest EUDR alignment measures across CSLs as of January 2025.

In the framework of the HARMONIOR project, the focus on "bio-based" is on industrial bio-based systems, excluding food/feed, biofuels, bioenergy, and cultural/recreational sectors. This allows for a better focus on the existing and emerging bio-based sectors within the larger bioeconomy. Product coverage for EUDR includes timber, rubber, soy, palm oil, cattle, and cocoa, as well as products derived from these raw materials. Therefore, the analysis in Chapter 7 considers timber, rubber, soy, and palm oil. This means also that the results related to alignment with the EUDR is only relevant for CSLs that include covered commodities in their scope. This includes the following Certification Schemes and Labels (CSLs):

- FSC with Regulatory Module
- RSPO
- RTRS with Model IV – Alignment with EUDR Chain of Custody
- SBP DTS EUDR module
- ISCC with EUDR Add-on

7.3 Summary of key findings in the CSLs evaluated against the EUDR

In the following, we have outlined the key findings from the CSL analysis, focusing on the main strengths and gaps in the CSLs that may affect their suitability for use by EU operators as a means of managing risks.

7.3.1 Compliance with relevant legislation

The EU Deforestation Regulation (EUDR) defines legality as compliance with the relevant laws of the country of production, including laws related to land use rights, labour rights, environmental protection, and taxes (see section on EUDR above). To evaluate how well the Certification Schemes and Labels (CSLs) align with the EUDR's definition of legality, we assessed their frameworks based on their coverage of these legal aspects.

FSC is well aligned with the EUDR definition of legality. Its standards obligate compliance with national and international laws, mandate secure land tenure, and require that customary rights be recognized. FSC also addresses child labour, forced labour, and discrimination, while including mechanisms to detect corrupt practices and ensure that organizations operate transparently. However, some details regarding migrant workers' rights are less explicit.

SBP likewise meets many core aspects of the EUDR's legality requirements. It has clear provisions on land rights, the protection of the supply base from illegal activities, compliance with CITES, and documented systems to handle worker safety and labour laws. Although SBP focuses largely on woody biomass, it incorporates due diligence requirements for feedstock sourcing and mandates risk assessments for illegal harvest or trade. While SBP's standards reflect high-level compliance, specific clauses—such as those for maternity or paternity leave—are less clearly documented

ISCC requirements ensure that land is used legitimately, that customary rights are respected, and that bribery is prohibited. The scheme also addresses forced labour, child labour, discrimination, and safe working conditions. Nonetheless, some legal requirements, for instance regarding taxes may be covered only in general terms rather than through explicit indicators. Specific mention of migrant worker rights is also not explicit.

RSPO standards include legal compliance with host-country requirements, measures to resolve land conflicts, and prohibitions on child labour and discrimination. However, explicit anti-corruption provisions and references to trade or tax laws are limited

RTRS covers legal land tenure, forced and child labour issues, Indigenous rights, and a due diligence system to handle risk. Its provisions on land rights and the exclusion of disputed land conform to EUDR expectations. Requirements regarding taxes are not always explicitly mentioned in all national interpretations.

A general requirement of compliance with all relevant legislation is not sufficient to cover all legality issues as defined by the EUDR, most schemes align with key components of the EUDR's legislation requirements, notably land rights, environmental protection, and human rights. Differences emerge in how explicitly each scheme addresses corruption, taxes, and migrant worker rules, which could affect the completeness of their alignment with all elements of the EUDR's definition of legality.

7.3.2 Coverage of deforestation and forest degradation

The EUDR requires that commodities be produced without deforestation or forest degradation. FSC and SBP definitions of forests, deforestation, and degradation already align fully with EUDR requirements.

ISCC prioritizes the protection of high-carbon stock and highly biodiverse areas through HCV/HCS assessments, although its definition of forest relies on a one-hectare threshold, whereas the EUDR applies to areas of at least 0.5 hectares that meet certain criteria for tree height and canopy cover. Consequently, EUDR's forest definition is broader, covering more wooded lands than ISCC's current parameters.

Similarly, RSPO employs an HCV/HCS approach but lacks an explicit forest definition. A recent RSPO gap analysis acknowledges the need to align or expand its forest definition to meet EUDR standards. One particular concern is that plantation forests have not been considered relevant by RSPO's gap analysis yet including them is necessary to match the EUDR scope.

RTRS prohibits deforestation of natural forests and sets minimum allowable levels of deforestation, but this falls short of the full EUDR definition of forests, and a recent update to its chain of custody standard does not expand the scope of deforestation covered.

Despite these differences, most schemes do effectively address natural forest conversion. Where gaps exist, they tend to involve narrower definitions of forests or lack a detailed approach to forest degradation. Such discrepancies can limit the extent to which the schemes guarantee alignment with EUDR requirements for legally deforestation-free production.

7.3.3 Corruption Prevention and Conflict of Interest Management

One of the core obligations of the EUDR is ensuring that supply chains are free from illegal practices, such as corruption and land grabbing, which contribute to deforestation. The comparative analysis of corruption and fraud prevention across various CSLs shows mixed results.

FSC, ISCC, and RTRS explicitly require corruption checks starting at the farm level. SBP requires a risk assessment from Supply Chain Maps to evaluate national-level issues such as corruption. RSPO does not address corruption in its farm or chain of custody standards.

At the system level, most certification systems rely on impartiality policies and ISO-based frameworks to reduce corruption risks, yet they differ in how comprehensively they address bribery or fraud.

ISCC requires accredited Certification Bodies to maintain conflict-of-interest policies and obliges new applicants to disclose previous certification issues. FSC likewise emphasizes impartiality, with top management accountability and mandatory disclosure by all personnel of any conflicts, while its Policy for Association adds another layer of screening: organizations must declare prior misconduct and undergo scrutiny if allegations of illegal activity arise. SBP incorporates a Customer Due Diligence step, instructing Certification Bodies to verify whether an applicant had previous scheme participation or a different legal identity, which can reveal attempts to hide past unethical behaviour. RTRS auditors are required to check if producers at farm level have a system in place to manage bribery risks, but it primarily relies on stakeholders to report wrongdoing rather than embedding anti-corruption at the system level. RSPO, though it references ethical conduct and conflict-of-interest policies, lacks a direct mechanism to identify whether an applicant or certificate holder has faced corruption sanctions, focusing more on membership status and disclosure of non-compliant land clearing.

Certification systems vary in how they address bribery and fraud. ISCC, FSC, and SBP employ conflict-of-interest policies, mandatory disclosures, and due diligence steps to ensure top-level accountability, while

also requiring corruption checks at the farm level. These measures prohibit bribery and use risk assessments to detect misconduct. In contrast, RSPO and RTRS rely more on stakeholder reporting, ethical guidelines, and post-complaint processes, lacking direct mechanisms to track corruption sanctions. Overall, ISCC, FSC, and SBP demonstrate more robust anti-corruption approaches, whereas RSPO and RTRS still exhibit some gaps.

7.3.4 Traceability

The EUDR places significant emphasis on the **traceability** of commodities to ensure that they are sourced from deforestation-free regions. The EUDR requirement includes the transfer of the exact geolocation data of the plot for land of production throughout the supply chain to the Operator in the EU.

The traceability systems across different certification schemes show varying degrees of detail and technological integration. Until recently, most schemes offered basic traceability through chain of custody (CoC) approaches like segregation and mass balance, andonly a few incorporated geolocation-based traceability. However, in the last few months, several schemes have begun enhancing their tools to facilitate transparent deforestation-free information transfer and ensure compliance with reporting requirements.

FSC collects information and evidence of each product in the FSC Regulatory Module, including geolocation of all plots where the product was produced, and offers FSC Trace, which uses blockchain technology to ensure tamper-proof records and third-party verifiability.

ISCC follows an integrated approach, requiring the ISCC EUDRx Tool to analyze production areas for deforestation and legality risks using geolocation data, then forwarding this analysis—along with sustainability documentation, quantity bookkeeping, and auditor verification—throughout each supply chain step.

SBP employs its Data Transfer System (DTS) to gather, convey, and confirm data along the supply chain. The DTS EUDR module enables the creation of detailed supply chain maps featuring geolocation and harvest data, which can be shared through EUDR Transactions, and generates Due Diligence Statements for submission to the EU's information system.

RTRS has an Online Platform to record certified materials and connect stakeholders. New chain-of-custody rules for EUDR alignment specify requirements for due diligence statements and geolocation data uploads, though it has yet to adapt the tool itself to include EUDR-specific traceability.

RSPO certified mills must hold geolocation data for palm fruit, but this information is not routinely shared along the supply chain, nor is geolocation further defined in its standard. In early February, RSPO launched "prisma," a digital platform designed to improve traceability and help members extract data relevant to EUDR, yet RSPO's own gap analysis indicates that further adaptation of its information system is needed to fulfil due diligence obligations, and the exact nature of such updates is unclear.

While these certification schemes are progressing toward stronger alignment with EUDR traceability requirements, many newly introduced features are not yet fully operational for all certificate holders. This analysis offers an initial view of how these schemes can support EUDR compliance and reveals where gaps remain. More conclusive insights into their streamlined performance will only emerge once the

Regulation's Information System is fully functional at its application date. Notably, this date has been postponed to December 30, 2025, for large operators and traders, and June 30, 2026, for micro and small companies, allowing all stakeholders extra time to align their processes and tools with EUDR requirements.

7.5.3 Addressing land tenure and Indigenous Rights

A component of the EUDR is ensuring that land used for commodity production is legally sourced and does not infringe on the rights of Indigenous Peoples and local communities. All schemes evaluated provide some level of protection for land tenure and Indigenous rights, uphold customary rights, and apply the principles of Free, Prior, and Informed Consent (FPIC). In addition, they all require identifying local communities and resolving any land conflicts as prerequisites for certification.

FSC, RSPO, RTRS, SBP, and ISCC, require clear evidence that land rights are both legally established and recognized by those who hold customary or traditional claims. They generally mandate that producers document formal ownership, leases, or rights of use before operations commence, and they oblige compliance with relevant national laws, customary rights, and international standards for Indigenous Peoples. For instance, FSC references documented legal tenure and emphasizes that boundaries must be clearly identified, while RSPO calls for demarcation of legal or authorized boundaries and requires an independent social and environmental impact assessment to involve affected stakeholders from the outset. RTRS requires documented evidence of rights to use land and calls for a participatory community rights assessment where disputes exist, whereas SBP highlights the importance of identifying and respecting local communities and Indigenous Peoples, with mechanisms for resolving grievances and avoiding negative social impacts. ISCC similarly establishes that farms must prove legitimate land use, respect customary land rights, and apply PFIC when new acquisitions occur. Across these schemes, grievance mechanisms are typically required, ensuring that affected communities can raise complaints without retaliation and that producers document the resolution of any conflicts. FSC and RTRS require organisations that were involved in previous conversion of natural forests to demonstrate restitution of social harms.

In regions where land conflicts and unclear land tenure systems contribute to illegal deforestation, CSL's can have the ability to demonstrate the EUDR's requirements for legal land use. Ensuring clear land tenure and respecting Indigenous rights is essential for preventing deforestation caused by illegal land grabbing or exploitation.

7.3.6 Smallholder inclusion

The EUDR requires that all commodities placed on the EU market, including those produced by smallholders, are deforestation-free. Smallholder farmers are often at higher risk of engaging in unsustainable land-use practices due to limited resources and access to sustainable farming methods.

To assist smallholders and raw material producers, certification schemes generally offer group certification as a way to reduce costs, simplify certification processes, and adapt requirements to the practical realities of family farms. However, it is not always clear how these schemes specifically address the reduced obligations for smallholders as outlined in the EUDR for Micro, Small, and Medium Enterprises (SMEs).

FSC provides robust support for smallholders through guidance, tailored certification programs, group certification options, stepwise approaches, and dual FSC-Fairtrade certification. The FSC Regulatory Module also distinguishes between SMEs and Non-SMEs, adjusting applicable clauses accordingly.

ISCC has developed an Independent Smallholders Certification process, which aims to support smallholders in increasing productivity while providing online training and certification guidance. This approach focuses on key issues that affect smallholders and helps to reduce costs. ISCC's method includes a standardized approach for certifying individual smallholders.

RTRS has partnered with NGOs to assist small and medium-sized farms in improving production and preparing for RTRS certification. Through a five-year process, RTRS has supported smallholders in meeting certification standards, starting with basic requirements such as ensuring no deforestation and prohibiting labor abuses. RTRS has also updated its Chain of Custody standards in response to the EUDR, briefly noting the reduced obligations for organizations classified as SMEs.

RSPO offers smallholders inclusion through its Independent Smallholder Standard, which utilizes a step-by-step approach to reduce certification barriers. RSPO's Smallholder Support Fund allocates 10% of income from certified sales to assist with certification costs. The scheme also provides group certification alongside simplified tools designed to help smallholders meet the scheme's requirements. Additionally, RSPO's Smallholders Engagement Platform connects farmers with buyers and other stakeholders who offer support.

SBP, while recognizing and collaborating with other certification schemes that include smallholders, is primarily focused on large-scale energy production for woody biomass. The SBP certification scheme does not offer a dedicated smallholder program, nor does it provide group certification. However, the SBP Data Transfer System (DTS) EUDR module outlines how existing reference numbers can help facilitate the sharing of due diligence statements for SMEs. Further clarification on this process will be provided once the EU Information System is operational.

While these certification systems provide varying levels of support for smallholders, it is important to acknowledge that challenges remain. High compliance costs and limited awareness of certification requirements can still be significant hurdles. Partnerships between cooperatives, NGOs, and private sector companies are particularly valuable in offering capacity-building initiatives, financial assistance for certification costs, and improved market access for certified products. To ensure smallholders can fully comply with EUDR requirements, further assistance and strategic partnerships are essential.

7.3.7 Mixing material along the supply chain

Certification schemes have different standards that vary in their levels of strictness or sustainability requirements, with the most stringent criteria generally applied at the farm or plantation level. As certified raw materials move along the supply chain, intermediaries may separate or mix them according to the specific rules of each scheme's supply chain model. However, because the EUDR prohibits the mixing of non-compliant materials, every step must ensure that only deforestation-free commodities reach the EU market.

All schemes evaluated offer a segregation option, though there is insufficient supply of fully segregated materials to meet global demand. When choosing a volume-control strategy, stakeholders often weigh the desire for fully segregated supply. Although full segregation can meet high sustainability expectations, it may exclude smallholders or create supply bottlenecks, while simpler models can enable more producers to participate and generate more widespread, incremental improvements.

The EUDR is prompting certification schemes to adjust their systems in ways that accommodate legal, deforestation-free production across diverse contexts. **Controlled mass balance** models have therefore become a practical compromise, allowing a degree of separation for at least legally sourced, deforestation-free materials. FSC and RTRS, for example, have updated their requirements to include due diligence processes aligned with EUDR obligations, enabling organizations to evaluate and mitigate deforestation and legality risks.

SBP, primarily focused on woody biomass, recognizes external programs such as FSC Controlled Wood or PEFC[1] Controlled Sources to classify feedstock as SBP-controlled biomass. However, FSC Controlled Wood may allow up to 0.5% natural forest loss and does not consider conversion of plantation forest, which is at odds with EUDR rules unless supplemented by an FSC EUDR Regulatory certification. SBP's new DTS EUDR module offers a Supply Chain Maps Builder tool that could help close gaps by clarifying sources and verifying compliance.

RSPO does not have controlled mass balance model specifically designed for EUDR-compliant sourcing. In cases where RSPO certified entities combine certified with non-certified materials, they will need to demonstrate that any non-certified portion is also deforestation-free and legally produced.

ISCC, via its EUDR add-on module, disallows mixing certified and non-certified materials, though the scheme still permits combining different categories of certified sustainable materials under a Soft IP (Bulk Commodity) model.

Some schemes, including RTRS, ISCC, and RSPO, do not fully align their forest definitions with the broader EUDR scope, creating a potential gap for companies sourcing from those certifications (refer to 7.5.2 for more details).

Striking a balance between regulatory stringency and practical implementation remains crucial for advancing inclusive sustainability while meeting the EUDR's requirements.

7.3.8 What about credit system?

Certification schemes like RTRS and RSPO use credit based CoC systems. This system allows companies to buy certification credits without themselves physically sourcing certified material, through a book and claims type system. By purchasing credits, buyers compensate for the volume of uncertified material used in their products.

EUDR does not prohibit the buying or sale of credits, as such, but it must be noted that the EUDR requires that all material can be traced back to the plot of land where it was produced. Most credit systems will not enable this, and different systems will have to be used to meet EUDR requirements.

[1] PEFC was not evaluated in this analysis

8. CONCLUSIONS

The findings of this report underscore both the strengths and persistent challenges evident across the ten Certification Schemes and Labels (CSLs) evaluated. On the positive side, most schemes show a well-developed capacity to enforce fundamental human rights protections, including the prohibition of child labour, non-discrimination, and provision for safe working conditions. Many also incorporate robust environmental safeguards, addressing issues such as ecosystem conservation, careful chemical management, and pollution control. In many instances, the auditing and assurance processes—particularly those reliant on impartial third-party assessments—form a strong foundation that fosters stakeholder trust and transparency. Despite variations in scope and methodology, all the schemes generally demonstrate a commitment to impartial governance, with documented efforts to avoid undue influence from scheme owners.

Nevertheless, some gaps still undermine the overall effectiveness of CSLs in promoting fully sustainable practices. Climate change adaptation, for example, remains insufficiently addressed by most schemes, which rarely provide clear frameworks for certified entities to anticipate and manage the complex climate-related risks they face. Similarly, while child labour and workplace safety are widely covered, crucial social dimensions such as fair wages, adequate housing, and consistent anti-corruption measures often receive limited or inconsistent attention. Accreditation and oversight structures also exhibit deficiencies in many schemes, where monitoring and evaluation often lack the scope to measure long-term impacts.

In relation to the European Union's Deforestation Regulation (EUDR), some schemes have swiftly updated their standards to incorporate geolocation data, thorough risk assessments, and chain-of-custody models aimed at segregating compliant commodities. Most schemes acknowledge the importance of legal land tenure and Indigenous rights, requiring documentation of land ownership and adherence to Free, Prior, and Informed Consent (FPIC). Yet incomplete forest definitions, divergent policies on plantation forests, and limited anti-corruption frameworks could weaken overall compliance and effectiveness. Smaller producers often face particular hurdles, such as high certification fees or a lack of awareness of regulatory obligations. While group certification and cost-sharing initiatives are emerging to help smallholders, ensuring they meet strict due diligence rules often remains an uphill task. Certificates alone cannot fully replace a company's obligation to map supply chains, detect corruption risks, and verify legal compliance. Companies are still responsible to establish robust internal due diligence systems, conduct regular supplier audits, maintain comprehensive documentation trails, and actively monitor for emerging risks in their sourcing regions. Nonetheless, if implemented carefully, certification can act as a valuable risk mitigation tool, allowing operators to demonstrate responsible sourcing practices and better trace materials back to their origins.

These findings suggest that while CSLs play a valuable role in promoting sustainability. The success of future certification efforts will depend on the ability of schemes to address these gaps while maintaining their existing strengths in core sustainability areas. Finally, this analysis underscores the importance of continued evaluation and benchmarking of certification schemes. As sustainability challenges evolve, and regulatory landscape become more complex, regular assessment of CSL effectiveness will be crucial for ensuring they remain relevant and impactful tools for promoting sustainable practices across global supply chains.

9. APPENDICES

APPENDIX A - Comparative Benchmark Tool

Code	Generic Control point text
A	**Sustainability and other certificate holder requirements**
A.1	**Economic sustainability**
A.1.1	**Land tenure and management rights are secure**
A.1.1.1	Land tenure rights are secure and registered according to legal requirements.
A.1.1.2	Land management rights are in place and registered according to legal requirements.
A.1.1.3	Land tenure and management rights are obtained through a process that ensures that Free Prior Informed Consent (FPIC) is secured before any activities are commenced that may affect Indigenous Peoples' or local communities' lands, territories and resources.
A.1.1.4	In case of ongoing land tenure or management rights disputes, these are managed through a culturally appropriate and transparent process, agreed upon by the affected parties.
A.1.1.5	Land areas under management are protected from illegal encroachment by third parties.
A.1.1.6	The use of natural resources ensures long-term productivity and yield of the resources.
A.1.2	**Management and operations are conducted responsibly**
A.1.2.1	There is no evidence that legal requirements are not complied with in relation to land management rights, operation, harvesting and production, taxes and bribery.
A.1.3	**Corruption and conflict of interest are avoided**
A.1.3.1	All forms of bribery and corruption are avoided
A.1.3.2	Conflicts of interest are identified, declared and managed
A.1.4	**Trade and transport are conducted legally and responsibly**
A.1.4.1	Agreed payments are made in a timely manner and receipts specifying price, quantity/volume/weight, quantities, deductions and amount paid are given.
A.1.4.2	Contracts with suppliers and/or buyers have clear terms, are transparent, have an agreed timeframe and are not changed or cancelled unilaterally.
A.2	**Social sustainability**
A.2.1	**Human rights are respected**
A.2.1.1	There is no evidence that legal rights related to child labour, modern slavery including forced and prison labour, Freedom of association, Rights to Organise and the right to Collective bargaining, recruitment and employment, discrimination, gender equality, Indigenous Peoples, workplace health and safety and employer provided accommodation are violated.
A.2.1.2	Human rights are respected as required by international and national law.
A.2.1.3	Harvest or trade in products do not contribute to a violation of international human rights or armed conflicts.

A.2.1.4	Significant past human rights violations caused by the organisation are remediated as indicated in Principle 31 of the UN Guiding Principles on Business and Human Rights.
A.2.2	**Child labour is not present, and employment of young workers is responsibly managed**
A.2.2.1	Legal requirements related to child labour and employment of young workers are complied with.
A.2.2.2	Children under the age of 15 (or underage for the completion of compulsory education, whichever is higher) are not employed except within the framework of "Family Farm"5 work or where covered by the national legislation.
A.2.2.3	Where young workers are employed, the following are met: a) Young workers only work outside of compulsory school hours. b) Young workers do not work more than 8 hours a day. c) Young workers do not work without supervision during night hours.
A.2.3	**Modern slavery, forced or compulsory labour do not occur**
A.2.3.1	Modern slavery, forced or compulsory labour are not used, promoted or supported in any way.
A.2.3.2	Withholding of salary, benefits, documents or property is not used in ways to restrict workers' freedom.
A.2.3.3	Workers have the right to leave the workplace after completing their workday
A.2.3.4	Workers are free to terminate their employment provided they give their employer reasonable notice.
A.2.4	**Workers' rights are respected**
A.2.4.1	ILO convention requirements related to Freedom of Association, the Right to Organise and the Right to Collective Bargaining are respected.
A.2.4.2	Overtime is voluntary and does not result in a work week exceeding 60 total hours, except under circumstances of shorter duration where additional labour is required.
A.2.4.3	Workers are treated respectfully and never subjected to abuse or harassment (including sexual) or verbal, physical or psychological mistreatment.
A.2.4.4	Workers' privacy rights are respected, including, but not limited to, whenever an employer gathers private information or implements employee-monitoring practices.
A.2.4.5	Employment conditions of workers, including wages, bonuses, work hours, overtime, vacation, and others, are documented and available to workers before employment.
A.2.4.6	Responsibilities towards workers are not avoided by hiring de facto permanent, long-time, full-time workers under seasonal or temporary contracts.

A.2.4.7	Where migrant workers are hired, the following are ensured, in addition to the Frameworks other provisions related to human rights and workers' rights: a) The employment of migrant workers follows legal requirements. b) Migrant workers are legally authorised to enter, to stay and to engage in a remunerated activity in the area/country. c) Migrant workers and their families are free to travel and leave the area/country without restrictions, except those defined by law.
A.2.4.8	Migrant workers are ensured equal opportunities and no less favourable treatment than local workers.
A.2.5	**Discrimination does not occur**
A.2.5.1	There is no discrimination in hiring, remuneration and access to training, promotion, termination or retirement.
A.2.6	**All workers are remunerated in a responsible manner**
A.2.6.1	The remuneration received for a standard workweek by a worker in a particular place is sufficient to afford a decent standard of living for the worker and their family.
A.2.6.2	Workers' wages meet or exceed minimum industry standards or other recognised industry wage standards.
A.2.6.3	Payment is made directly to all workers to ensure they safely receive and retain their wages.
A.2.6.4	Where an employer provides services for which workers pay, such as medical services, schooling, meals and other amenities, these are valued fairly and do not exceed local market prices.
A.2.6.5	Workers' wages and benefits are received as contractually agreed for each pay period.
A.2.7	**Employer-provided housing is safe and hygienic**
A.2.7.1	Accommodation is offered to workers if no affordable or safe accommodation is otherwise available, especially in remote locations where commuting is not a viable option or where workers are expected to stay within the premises for an extended period.
A.2.7.2	If workers pay for employer-provided accommodation, the cost of accommodation is proportional to the pay and comparable to similar accommodation in the area/industry.
A.2.7.3	Employer-provided accommodation is safe and hygienic.
A.2.7.4	Where workers and their families live in employer-provided accommodation, the employer ensures access to medical, educational and social services.
A.2.8	**Workplaces are safe and healthy**
A.2.8.1	Equipment, vehicles, machinery and utilities are safe and in good working order, and relevant safety features are complete and functioning.
A.2.8.2	Indoor workplaces are hygienic with adequate lighting, temperature, ventilation, sanitation, drinking water, sanitary facilities, as well as break facilities and food storage.
A.2.8.3	Workers are competent in relevant health and safety issues, including handling chemicals and machinery, and receive appropriate safety and health training.

A.2.8.4	Personal Protective Equipment (PPE) and tools, are available to and used by workers, be in good condition, and appropriate for the specific activity.
A.2.8.5	Workers handling chemicals have access to appropriate facilities for cleaning and washing.
A.2.8.6	Expectant and nursing mothers are not engaged in activities that expose them to health and safety risks.
A.2.8.7	Emergency exits, fire detection, emergency alarms and fire suppression equipment are in place, visible and in working order and workers are competent to handle equipment and react to emergencies.
A.2.8.8	Workers have access to appropriate first-aid equipment and medical services, in case of emergencies.
A.2.9	**Gender equality is maintained and protected**
A.2.9.1	Job opportunities are available to everyone, irrespective of gender, under the same conditions.
A.2.9.2	Irrespective of gender, there is equal remuneration for work of equal value.
A.2.9.3	Legal requirements related to maternity and paternity leave are complied with.
A.2.10	**The rights of Indigenous Peoples are protected**
A.2.10.1	Indigenous Peoples potentially affected by the organisation's activities are identified.
A.2.10.2	The rights of Indigenous Peoples are respected and upheld, following principles of Free, Prior and Informed Consent (FPIC)
A.2.10.3	The impacts of activities on Indigenous Peoples are identified, and adverse effects are avoided.
A.2.10.4	Interaction with Indigenous Peoples is conducted in a respectful and culturally appropiate manner.
A.2.11	**Community rights are respected**
A.2.11	Communities potentially affected by the operations are identified
A.2.12	Legally recognised customary and community rights are identified and respected.
A.2.13	Reasonable opportunities for employment, training and other services are available to communities.
A.2.14	Sites and resources within the area of operation fundamental for satisfying the basic needs of communities are identified and protected (High Conservation Value-HCV-5).
A.2.15	Sites, resources, habitats of cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of communities affected by operations are identified and protected as appropriate (High Conservation Value-HCV- 6).
A.3	**Environmental sustainability**
A.3.1	**Natural forests and other natural ecosystems are protected from degradation and conversion**
A.3.1.1	Forests are not converted to Agriculture

A.3.1.2	Primary forest is not degraded or converted to Plantation Forest, Other Planted Forest or Other Wooded Land
A.3.1.3	Naturally Regenerating Forest is not degraded or converted to Plantation Forest or Other Wooded Land
A.3.1.4	Natural Forest is not degraded or converted to other forest types or Other Land AND Primary Forest is not converted to Other Natural Ecosystems
A.3.1.5	Other Wooded Land and Other Natural Ecosystems are not converted to Plantation Forests, Other Land or Agriculture
A.3.1.6	Other Natural Ecosystems are not converted to Other Planted Forest or Other Wooded Land after
A.3.1.7	Where conversion of Natural Forests or other Natural Ecosystems has occurred within the last 10 years, restoration activities are implemented to compensate for past ecosystem loss.
A.3.1.8	There is no evidence that legal requirements are not complied with in relation to biodiversity conservation, protected sites and the protection of endangered or protected species, activities in non-forest areas, including Other Natural Ecosystems, CITES species, chemical use and storage; waste and soil management as well as protection of surface and ground water.
A.3.1.9	The use of natural resources ensures long-term productivity and yield of the resources.
A.3.1.10	If clear-cuts are used for forest management, the size of clear-cuts is minimised to be ecologically appropriate for the forest ecosystem, type and biome.
A.3.1.11	Fire risk is controlled, and fire is only used for land preparation, where environmental and social benefits are demonstrated.
A.3.2	**Ecosystem and biodiversity values are identified and protected**
A.3.2.1	Ecosystem and biodiversity values within the production area are known and maintained or enhanced.
A.3.2.2	Forests and other natural ecosystems are managed in a way that maintain or enhances the functions and services provided by the ecosystem, including related biodiversity and structural complexity.
A.3.2.3	Rare, endangered or protected animal and plant species are identified, and their populations are protected, maintained or enhanced.
A.3.2.4	Introducing invasive species is avoided, and already present invasive species are controlled as possible.
A.3.3	**Chemicals are used cautiously with minimum negative impacts**
A.3.3.1	Prohibited chemicals listed in Stockholm Convention Persistent Organic Pollutants are not used.
A.3.3.2	Where chemicals are used, they are stored and used to ensure minimal adverse impacts on people, ecosystems and the environment.
A.3.3.3	The use of chemicals is monitored and minimised.
A.3.3.4	Chemical drift, run-off or spills are effectively avoided and controlled.

A.3.3.5	Chemicals and materials used in the product are selected to prioritise the protection of human health and the environment, generating a positive impact on the quality of materials available for future use and cycling (Cradle to Cradle).
A.3.3.6	Chemicals with known risks for pollinators, or other non-target species, are only used if: a) Non-chemical methods or less toxic pesticides are not available b) Exposure to natural ecosystems is minimised and c) Contact of pollinators and other non-target species with these substances can be minimised
A.3.3.7	Where fertilisers are used: a) The type of fertiliser is selected based on soil assessment and crop nutrient needs over the growing season and b) The amount, timing and application of fertiliser are adjusted to plant nutrient needs and to minimise nutrient loss to the surrounding environment.
A.3.4	**Waste is reduced and managed appropriately**
A.3.4.1	Waste storage, treatment and disposal practices do not pose health or safety risks to people or natural ecosystems.
A.3.4.2	Waste is not deposited outside appropriate and legally approved waste storage facilities.
A.3.4.3	Waste is not burned, except in incinerators technically designed for the specific waste type and to recover energy.
A.3.4.4	Waste is managed to ensure reduction, recycling, reusing and safe disposal based on the toxicity of the materials.
A.3.4.5	In the case of cross-border transportation of hazardous waste, the requirements of the Basel Convention are complied with.
A.3.4.6	Products are intentionally designed for their next use and are actively cycled in their intended cycling pathway(s) as far as possible. (Cradle to Cradle).
A.3.5	**Pollution is minimised or prevented**
A.3.5.1	Wastewater and sewage from operations are not discharged into the surrounding environment, including aquatic ecosystems unless it has undergone treatment to reach a safe level.
A.3.5.2	The use of Ozone Depleting Substances (ODS) is conducted according to legal requirements and minimised as far as possible.
A.3.5.3	Land-management is conducted in a way that reduces run-off to surrounding environment, including aquatic resources.
A.3.5.4	Release of pollutants into the air is prevented or reduced and meets all legal levels for emissions.
A.3.5.5	Pollution from noise and light is minimised or avoided.
A.3.6	**Water resources are protected and used efficiently**
A.3.6.1	Ground and surface water use is optimised and potential negative impacts on the surrounding environment are reduced.
A.3.6.2	Water resources are used and managed to ensure that water quality and balance are maintained or improved and do not restrict other users' availability.
A.3.6.3	Natural water bodies are protected from adverse impacts of activities, including chemical, fertiliser and slurry drift and run-off.

A.3.6.4	Riparian buffer zones are protected.
A.3.7	**Soil is conserved and managed appropriately**
A.3.7.1	Water and wind erosion are reduced through practices such as ground covers, mulches, protection and re-vegetation of steep areas, terracing or filter strips to protect soils.
A.3.7.2	Harvesting, cultivation and grazing practices are implemented to maintain or improve the soil's physical, chemical, and biological condition.
A.3.7.3	Harvesting, cultivation and grazing are not practised on vulnerable soils where it causes long-term damage to the ecological functions of the soil, such as very steep slopes and peat soil types.
A.4	**Climate change**
A.4.1	**Greenhouse emissions are reduced**
A.4.1.1	*Greenhouse gas* emission sources are identified, considering management practices, land use change, livestock, energy, sourcing and use of materials.
A.4.1.2	If there is a risk that sourcing activities may cause significant indirect land use change through *conversion* or destruction of forests or *natural ecosystems* elsewhere, steps are taken to mitigate such risk.
A.4.1.3	Efforts are taken to reduce the emission of *greenhouse gases* resulting from activities, meeting, at minimum, the industry sector's best practices and considering the best available technology.
A.4.1.4	The amount of soil carbon is maintained or increased over a measurable time period.
A.4.1.5	Biomass is harvested from land that follows the evaluation based on the High Carbon Stock Approach (HCSA)
A.4.1.6	If applicable, national and/or international regulations concerning emission reduction targets for relevant climate change factors and actions are complied with.
A.4.2	**Climate change adaptation efforts are implemented proportionate to the risk**
A.4.2.1	The critical risks for the operation resulting or potentially resulting from climate change are identified.
A.4.2.2	Measures for climate change adaptation are implemented for high-risk areas and are proportionate to the scale of the operations and anticipated social, economic and environmental impacts.
A.4.3	**Efforts are taken for GHG removal and ecosystem restoration as appropriate**
A.4.3.1	Best business practices to ensure *GHG* removals based on land use and land management practices and carbon stocks to promote positive climate regulation over time are implemented.
A.4.3.2	If implemented, ecosystem restoration efforts aim to both regain the ecological functionality of the reference ecosystem and enhance human well-being while considering the area's changing environmental, social and economic conditions.
A.5	**Other Certificate Holder requirements**
A.5.1	**Material control**

A.5.1	The Scheme shall require systematic processes to enable the identification of the country of harvest of the material, and where applicable to a higher level of detail, such as the sub-national region or concession level.
A.5.2	The Scheme shall require systematic processes to enable the identification of the species included in materials or products included in the scope of certification.
A.5.3	The Scheme shall include clear and effective measures to prevent material from non-negligible risk, unverified or potentially illegal sources from entering the supply chain and mixed with conforming material.
A.5.4	Where applicable, the Scheme shall require the segregation and tracking of certified (according to each individual claim type) or verified legal products along the supply chain, using appropriate inventory methods and documented controls where necessary to ensure that risks of mixing are identified, managed and mitigated.
A.5.2	**Recycled material**
A.5.2	The Scheme shall have a definition of waste material which at least covers the definition of waste material.
A.5.3	The Scheme shall require systematic processes to enable the identification of waste material that has completed its life cycle and to differentiate this material from virgin or material that are by-products of a manufacturing process which has not completed its lifecycle.
A.5.4	The Scheme shall include clear and effective measures to prevent products produced from i) reclaimed material that has NOT completed its lifecycle and would otherwise have been discarded as waste", ii) unverified or iii) virgin material from, entering the supply chain.
A.6	**General requirements**
A.6.1	**Conflict resolution**
A.6.1.1	The Scheme shall include requirements that ensure tha t disputes are identified, recorded and managed, in a way that: i) ensures there is a transparent ongoing process to address the issue ii) requires for the exclusion from the scope of the certificate situations or areas or land where the legality of tenure or management/harvesting is not defined or is unclear and disputed. iii ensures respect for legally enshrined customary tenure rights of local communities.
A.6.2	**Corruption**
A.6.2.1	The scheme shall include requirements to ensure that certificate holders do not engage in corrupt practices related to illegal harvesting.
A.7	**Quality and procedure requirements**
A.7.1	**Internal Procedures for Certificate Holders**
A.7.1.1	The Scheme shall include requirements for the Certificate Holders to have in place - and implement - systems and procedures covering all requirements of the Scheme.
A.7.1.2	The Scheme shall include requirements for the Certificate Holders to regularly review the proper functioning of their own procedures.

A.7.2	**Qualification and competence**
A.7.2.1	The Scheme shall include requirements that ensure that certified organisations have personnel with sufficient qualifications and competencies to consistently and effectively implement Scheme requirements.
A.7.3	**Risk-based approaches to sourcing, trade or production**
A.7.3.1	If the Scheme includes an option to implement a risk-based approach to sourcing non-certified material (Due Diligence System), it shall: i) contain clear requirements and ii) ensure consistent implementation of the Due Diligence System, for all activities, materials and suppliers included within the scope of the certification.
A.7.3.2	The Scheme shall include requirements that ensure that whenever there is a change in the risk related to illegal harvest, trade or transport in a supply chain – or a supply chain covered by a DDS – the risk shall be assessed and mitigated prior to shipping and sale.
A.7.3.3	In cases where other 3rd party schemes are recognised by the due diligence system as meeting specific due diligence requirements, the scheme shall include requirements that ensure that it is clear: i) on what basis recognition is made and; ii) how it is verified that other Schemes ensure conformance with the specific due diligence requirements.
A.7.3.4	The Scheme shall include requirements to ensure that the DDS comprises, at a minimum, the following elements: i) a quality management system, ii) procedures for obtaining access to information pertinent to the identification of risk; iii) risk assessments, and iv) the implementation of mitigations measures when risks are identified.
B	**Assurance**
B.1	**Competence and qualifications**
B.1.1	The Scheme shall have mechanisms to ensure that auditors, and other relevant personnel of the Certification Body, are qualified and competent to evaluate organisations' compliance with specific Scheme requirements.
B.1.2	If the Scheme includes an option for the Certificate Holder to implement a Due Diligence System (risk-based system), the scheme shall ensure that the auditors and other relevant personnel of the Certification Body are qualified and competent to evaluate organisations' compliance with related Scheme requirements.
B.1.3	The Scheme is ISEAL Code-compliant
B.1.4	The Scheme has requirements aligned with ISO 17065.
B.1.5	Auditors are trained in accordance with ISO standards.
B.2	**Impartiality**
B.2.1	The scheme shall include requirements to ensure that auditors, and other personnel relevant to the conformance evaluation of an organisation shall be impartial to the entity(-ies) under evaluation.
B.2.2	The Scheme shall include requirements that ensure that the certification decision process is; i) well defined and ii) ensures that the decision on certification is conducted by positions/bodies that are impartial to the auditee.

B.3	Auditing process
B.3.1	The Scheme shall include requirements that ensure that Certification Bodies apply a documented methodology for the evaluation (assessments and audits) of clients.
B.3.2	As a minimum, this methodology shall include procedures for the following activities: i) Evaluation of conformity of organisations to the Schemes (e.g. audit of sites, or inspection of records or of self-assessment declarations); ii) Review and certification decision; iii) Issuance of a certificate; and iv) Periodic re-assessment.
B.3.3	The Scheme shall include requirements that ensure that Certification Bodies have in place - and implement – specific procedures for audits that include at least the following: i) frequency of audits; (no longer than every 12 months); ii) requirements for on-site (field) visits where applicable; iii) sampling protocol for audits (if applicable); iv) structure and competencies of the audit team; v) the minimum set of aspects that need to be checked in every audit; vi) minimum content of audit reports, including non-conformances, clarification of scope, audit process and evaluation findings. vii) ability for unannounced or short-notice audits in case of substantiated claims or for other reasons.
B.4	**Stakeholder consultation**
B.4.1	The Scheme shall include mechanisms to ensure that Certification Bodies conduct consultation with stakeholder (including rights holders) as appropriate in relation to audits (only applicable where necessary** for evaluating compliance of certificate holders). The scheme shall ensure that the certification holder has a proper stakeholder consultation process in place.
B.5	**Corruption**
B.5.1	The Scheme shall include mechanisms to identify (or for the Certification Body to do so) companies sanctioned for engagement in corrupt practices.
C	**Governance**
C.1	**Transparency**
C.1.1	**Transparency**
C.1.1.1	C.1.1.1 Scheme requirements for both Certificate Holders and Certification Bodies shall be publicly available online.
C.1.1.2	Schemes shall include requirements that ensure that relevant information about the following is freely available: i) development and content of the Scheme; ii) how the system is governed; ii) who is evaluated and under what process; iv) impact information and the various ways in which stakeholders can engage.
C.1.1.3	The Scheme shall include requirements that ensure that an up-to-date register of certified/verified organisations is publicly available.

C.1.1.4	C.1.1.4 The Scheme shall make summaries (or full reports) with relevant findings from audits available on the Internet.
C.1.2	**Impartiality**
C.1.2.1	Procedures for handling complaints and grievances shall be in place, made publicly available and implemented. The procedures shall be clearly publicised, making it easy for stakeholders to submit comments or complaints where applicable.
C.1.2.2	The Certification Scheme shall have in place requirements at all levels of the scheme (normative requirements for CHs, requirements for CBs, and for the scheme functioning) to manage risks of corruption and conflict of interest.
C.1.3	**Conflict of interest and corruption**
C.1.3.1	The Certification Scheme shall have in place requirements at all levels of the scheme (normative requirements for CHs, requirements for CBs, and for the scheme functioning) to manage risks of corruption and conflict of interest.
C.2	**Scheme and standard scope**
C.2.1	**Standard adaptation to the national or subnational context**
C.2.1.1	International standards shall be adapted to the national or subnational context in which they are being implemented and contain a list of applicable legislation, or the Scheme shall enable/require detailed evaluation of applicable legislation in a national context.
C.2.2	**International convention and treaties**
C.2.2.1	The Scheme shall include a list of the relevant international conventions to which the country has ratified, and which hold legal force in the country.
C.2.3	**Use of contractors**
C.2.3.1	The requirements for supply chain entities shall be applicable to the organisation's contractors and outsourcing facilities.
C.3	**Accreditation and oversight**
C.3.1	**Accreditation**
C.3.1.1	The Scheme shall include a system for accreditation or oversight of Certification Bodies to ensure that CBs have in place the required procedures, capacity and competencies.
C.3.1.2	The Scheme shall ensure that the requirements and process for accreditation is publicly available.
C.3.1.3	The Scheme shall make publicly available, an up-to-date list and details of all accredited Certification Bodies
C.3.1.4	The Accreditation Body shall have mechanisms to ensure that relevant personnel are qualified and competent to evaluate Certification Body's performance in relation to Scheme requirements.
C.3.2	**Oversight mechanism**

C.3.2.1	The Scheme shall ensure that the competence and consistent performance of Certification Bodies is regularly evaluated. Performance shall employ both desk-based AND field approaches, including: i) Stakeholder consultation ii) In-field evaluation of the performance of the Certification Body, whether via on-site inspections of certified forests/ supply chain entities or witness audits of audit personnel.
C.3.2.2	The Scheme shall include requirements that ensure that the oversight mechanism applies a clear basis for: i) establishing conformance; ii) raising corrective actions for non-conformance, and ensuring closure within timeframes to avoid legal non-compliance, and; iii) certification issue (or maintenance) decision making.
C.3.2.3	The Scheme shall specify the approach to be used in oversight, ensuring that the oversight mechanism is independent of the Certification Bodies being assessed.
C.3.2.4	The Scheme shall define the frequency of oversight or the procedure for determining the frequency, applicable in the case of risk-based oversight.
C.4	**Certification process**
C.4.1	**Compliance evaluation**
C.4.1.1	The Scheme shall include requirements that ensure that the Certification Bodies applies a clear basis for: i) establishing conformance; ii) raising corrective actions for non-compliance, and; iii) certification decision making.
C.4.1.2	The Scheme requirements for establishing conformance should enable comparison with the definition of negligible and non-negligible risk.
C.4.1.3	The Scheme shall include requirements that ensure that the above requirements are in line with the requirements to prohibit illegal material or material with a non-negligible risk category being placed on the EU market.
C.4.1.4	The Scheme shall include requirements that ensure that the decision process to certify organisations, or maintain certification of CHs, is free from conflict of interest and includes checks and balances.
C.5	**Monitoring, Evaluation, and Learning**
C.5.1	**Monitoring, Evaluation, and Learning**
C.5.1.1	The scheme owner shall implement an M&E system that includes both performance monitoring and outcome and impact evaluations
C.5.1.2	The scheme owner shall compile, analyse and produce reports on the results observed through performance monitoring at least once per year for internal purposes
C.5.1.3	If the scheme owner has had an operational system for at least two years, it shall conduct, commission or otherwise undergo at least one in-depth outcome or impact evaluation per year
C.5.1.4	The scheme owner shall ensure that at least some of these in-depth evaluations are independent impact evaluations, designed to determine whether it is possible to attribute observed changes to the standard system

APPENDIX B - Glossary of Terms

Term	Definition
Abuse	Abuse in the workers' rights setting refers to any mistreatment or exploitation of employees by their employers, supervisors or colleagues that violate their legal and ethical rights. Such abuse can take many forms, including: ● Physical abuse. It refers to any physical harm or injury inflicted on a worker by their employer or co-worker. ● Verbal abuse. It refers to any spoken or written communication that is intended to harm or intimidate a worker, such as insults, threats or harassment. ● Psychological abuse. It refers to any behaviour that is intended to manipulate or control a worker's thoughts, feelings or actions, e.g., gaslighting or emotional manipulation. ● Sexual abuse. It refers to any unwanted sexual behaviour, including sexual harassment, assault or rape that is perpetrated by an employer or co-worker. ● Economic abuse. This refers to any exploitation of a worker's financial situation, such as withholding wages or benefits, forcing workers to work in unsafe conditions or denying them breaks or rest periods.
Accreditation/ Oversight	Assessment of a certification body's provider's demonstration of competence to carry out specific assurance tasks.
Agriculture	Agriculture refers to the science, art and practice of cultivating crops and raising animals for food, fibre, fuel and other products. It involves various activities, such as planting, harvesting, irrigation, pest management, animal husbandry and soil management, among others.
Agricultural land	Land that is not classified as forest, other wooded land or other land. Explanatory notes: ● Land used for the production of agricultural crops, including palms (oil, coconut, dates, etc.), tree orchards (fruit, nuts, olive etc.), agroforestry and trees in urban settings; ● Land used for meadows or pasture for livestock and other animals.
Agricultural use	Agricultural use means using land for agriculture, including for agricultural plantations, livestock, and set-aside agricultural areas. Source: Text of the EU Deforestation Regulation adopted by the European Parliament on 19 April 2023
Armed conflict	Armed conflict refers to a situation where two or more groups engage in a violent confrontation using military or paramilitary forces. It is often characterised by using weapons, including firearms, explosives and other types of weaponry, and may involve fighting on the ground, in the air or at sea. Armed conflicts can be categorised into different types based on various factors, such as the nature of the conflict, the parties involved, the duration and the level of intensity. These include: ● International armed conflict. This is a conflict between two or more states or nations. ● Non-international armed conflict. This is a conflict that occurs within the boundaries of a single state or nation, between the government and non-state actors or between non-state actors. ● Civil war. This is a type of non-international armed conflict that occurs between different groups within the same state or nation. ● Guerrilla warfare. This is a type of non-international armed conflict characterised by small-scale, hit-and-run tactics used by irregular forces against a larger, more organised army.

Assessment / Main evaluation / Certification Audit	These terms often refer to the first full scale evaluation performed for a company who desires to be certified/ verified. In ISO documents the term audit is used for both first and subsequent audits with the most common terms being initial audit or certification audit. Full system audit is used primarily for management systems auditing and consists of Stage 1 audit (document review and initial review), which can be replaced by pre-assessment (see below); and Stage 2 audit which is an on-site audit of full management system implementation.
Audit/ Surveillance audit	These terms often refer to repeatedly conducted evaluations to monitor continuous conformance of the auditee to the requirements. The term 'annual audit' usually refers to annual surveillance audits.
Applicant **Auditee** **Audit Client** **Certificate holder** **Certified client** **Company** **Client** **Organisation** **Supplier (in product certification)**	Although these terms are sometimes used interchangeably, they are not necessarily synonyms. *Applicant* refers to a company that has applied for certification, but has not yet received it. An *audit client* may request an audit; the *auditee* is the organisation being audited. In some cases, these can be different (e.g., a company ordering an audit for its supplier). With auditing services, the general term *client* seems to be the most widely used term. In the COC certification, the certificate is often issued to the organisation that has direct management responsibility for the Chain of Custody system under its control. In FM certification, the certificate is often issued to the organisation that has ownership or management control over the applicable forest management units.
Biodiversity	The variability among living organisms from all sources, including, among other things, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; it includes diversity within species, between species and of ecosystems. Source: Convention on Biological Diversity 1992, Article 2. https://www.cbd.int/doc/legal/cbd-en.pdf
Carbon footprint	The total amount of greenhouse gases produced to directly and indirectly support human activities, usually expressed in equivalent tons of carbon dioxide (eCO2). This means that the carbon footprint may include the emissions of other greenhouse gasses than carbon dioxide (such as methane).
Certification	This is the process whereby an independent third-party (called a certifier or certification body) assesses the quality of forest management in relation to a set of predetermined requirements (the standard). The certifier gives written assurance that a product or process conforms to the requirements specified in the standard
Certification / Verification	The term is used a bit differently in different situations; however, it generally refers to the whole process of granting a certificate/ verification statement by an independent third-party assessor. The process starts formally with an application and ends after the certification/ verification decision has been made and certificate/ verification statement has been issued. In the broader context, annual surveillance activities are part of the certification/ verification process.

Certification body (CB) / Assurance provider	A certification body is an independent, impartial and competent legal entity that carries out certification auditing. Although it is not always a requirement that the assessor be accredited, professional certification bodies are usually considered to be those who have gained accreditation for the auditing services they offer.
Certification requirements / Norm / Normative document / Requirements / Standard	These terms refer to documented requirements that must be fulfilled by the auditee in order to receive a certificate. *Audit criteria* is the definitive, formal common ISO term for any set of requirements against which the auditee is audited. *Standard* is a term used more commonly in everyday language.
Certification Scheme	3rd party scheme providing assurance of conformance to a normative standard. The organisation determines the objectives and scope of the certification system and applicable standards, as well as the rules for how the System will operate and the standards against which conformance will be assessed. In most cases this is the standard-setting organisation, but it may also act as a Certification body.
Certification scope	The boundaries within which the certification audit will be conducted.
Chain of Custody (CoC)	The path taken by raw materials, processed materials, finished products and co-products from the area of production to the consumer or (in the case of reclaimed/recycled materials or products containing them) from the reclamation site to the consumer, including each stage of processing, transformation, manufacturing, storage and transport where progress to the next stage of the supply chain involves a change of ownership (independent custodianship) of the materials or the product. Source: FSC-STD-40-004 V2-1. https://fsc.org/en/document-centre/documents/resource/302
Chemical	In the Sustainability Framework, chemicals are broadly defined as distinct compounds or substances that have been artificially prepared or purified. Chemicals in the context of the Sustainability Framework may include any such substance, including different types of prohibited chemicals, but focus on different types of agrochemicals, such as pesticides, herbicides, insecticides, fungicides, fertilisers. It may also include other chemicals used in processing and manufacturing. (Also see the definition of prohibited chemicals in this document.)
Child	Any person under the age of 15, unless the minimum age for work or mandatory schooling is higher by local law, in which case the stipulated higher age applies in that locality. Source: Social Accountability Standard 8000-2014
Child labour	The term “child labour” is often defined as work that deprives children of their childhood, their potential and their dignity and that is harmful to physical and mental development. It refers to work that: • is mentally, physically, socially or morally dangerous and harmful to children; and • interferes with their schooling by: ▪ depriving them of the opportunity to attend school; ▪ obliging them to leave school

	prematurely or ▪ requiring them to attempt to combine school attendance with excessively long and heavy work. In accordance with international labour standards, a minor between the age of 12 and 15 may work, in parallel with studying, on a farm owned or operated by that parent or person standing in place of their parents [a guardian] if the following conditions are met: • The minor freely reports their wish to help and learn at the family farm if interviewed outside the farm • Work takes place outside of schooling • Work is always supervised by a parent or guardian • Work does not take place at night, does not consist of heavy lifting duties or hazardous work conditions, defined as: ▪ operating or assisting to technically operate any type of machine, including tractor and power engines; working from a ladder or scaffold (painting, repairing or building structures, pruning trees, picking fruit, etc.) at a height of over 2 metres; ▪ working in a confined space (e.g., silo or storage designed to retain an oxygen-deficient or toxic atmosphere); ▪ handling or applying any type of agricultural chemicals. The above requirements also apply to agricultural schools – apprentices and students that can be present on farms. Not all work done by children should be classified as child labour that is to be targeted for elimination. Children's or adolescents' participation in work that does not affect their health and personal development or interfere with their schooling is generally considered positive. It includes activities such as helping their parents with housework, assisting in a family business or earning pocket money outside school hours and during school holidays. These kinds of activities contribute to children's development and to the welfare of their families. They provide them with skills and experience and help prepare them to be productive members of society during their adult life. Source: International Labour Organization
Child labour	Whilst child labour takes many different forms, a priority is to eliminate without delay the worst forms of child labour as defined by Article 3 of ILO Convention No. 182: ● All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict; ● The use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances; ● The use, procuring or offering of a child for illicit activities, for the production and trafficking of drugs as defined in the relevant international treaties; ● Work which, by its nature or the circumstances in which it is carried out, is likely to harm children's health, safety or morals. Source: Worst Forms of Child Labour Convention, 1999 (No. 182).
Community rights	Although "community rights" is not a defined concept in international law, community members are entitled to the full range of human rights. Moreover, given the social, economic and political structures and

	cohesion of communities, there may often be a collective aspect to their rights. In this regard, there may be commonalities between community rights and indigenous peoples' rights, especially when projects impact lands and resources that concern entire communities rather than individuals.
Competent authority	National competent authorities are organisations that have the legally delegated or invested authority, or power to perform a designated function, normally monitoring compliance with the national statutes and regulations.
Complaint	A complaint is defined as a formal expression of dissatisfaction by any person or organisation presented as a complaint to an organisation or a person.
Conflict of interest	A conflict of interest occurs when a person's or entity's vested interests may affect their actions, judgment, and/or decision-making. For a public servant, a conflict of interest involves a conflict between a public official's public duty and private interests, in which the public official has private-capacity interests, which could improperly influence the performance of their official duties and responsibilities. Source: OECD, https://www.oecd.org/gov/ethics/2957360.pdf
Control measure	An action that an organisation shall take to mitigate the risk of sourcing material from unacceptable sources.
Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)	A multilateral treaty that aims to ensure that international trade in specimens of wild animals and plants does not threaten their survival. Source: CITES
Conversion	Conversion is defined as a change in a natural ecosystem (including forest and non-forest ecosystems) to another land use or severe degradation that results in a profound change in the ecosystem's species composition, structure or function.
Corruption Perceptions Index (CPI)	A global index of the perceived level of corruption in individual countries. The index has been developed by Transparency International. Source: Transparency International
Corruption	Transparency International defines corruption as the abuse of entrusted power for private gain. Corruption can be classified as grand, petty and political, depending on the amounts of money lost and the sector where it occurs.
Customary law	Interrelated sets of customary rights may be recognised as customary law. In some jurisdictions, customary law is equivalent to statutory law within its defined area of competence and may replace the statutory law for defined ethnic or other social groups. In some jurisdictions, customary law complements statutory law and is applied in specified circumstances. Source: FSC standard FSC-STD-01-001 V5-2. https://fsc.org/en/current-processes/fsc-std-01-001-v5-2-fsc-principles-and- criteria-pc-for-forest-stewardship

Customary rights	Rights resulting from a long series of habitual or customary actions, constantly repeated, which have, by such repetition and uninterrupted acquiescence, acquired the force of law within a geographical or sociological unit. Source: FSC-STD-01-001 V5-2. https://fsc.org/en/current-processes/fsc-std-01-001-v5-2-fsc-principles-and-criteria-pc-for-forest-stewardship
Deforestation	In the EU Deforestation Regulation, deforestation is defined as the conversion of forest into agriculture, whether human-induced or not. In the context of the Sustainability Framework, Preferred by Nature takes a slightly broader definition, including the conversion of natural forests into plantations or other wooded land or other lands. In this definition, deforestation is the loss of natural forest as a result, whether human-induced or not, of: ● Conversion to agriculture or other non-forest land uses ● Conversion to a plantation forest or ● Severe and sustained degradation. **Severe degradation** (scenario iii in the definition) constitutes deforestation even if the land is not subsequently used for non-forest land use. Loss of natural forest that meets this definition is considered deforestation regardless of whether or not it is legal. Adopted from the Accountability Framework and FAO. Source: Afi Definitions
Deforestation-free (synonym: no-deforestation)	Commodity production, sourcing or financial investments that do not cause or contribute to the deforestation of natural forests. Adopted from the Accountability Framework. Source: Afi Definitions
Discrimination	Any distinction, exclusion or preference made based on race, national or territorial or social origin, caste, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions, age or any other issue. Source: ILO Convention 111 Examples include discrimination based on: ● Race, colour, sex, age, sexual orientation, gender, caste, religion, political opinion, national extraction or social origin ● Nationality or migratory status ● Civil status ● Medical condition ● Family condition, including pregnant women and parents with children, or any other protected status as included in applicable laws ● Worker organisation membership or being an organiser ● Having filed complaints within the complaints or grievance mechanisms. Source: Sustainable Agriculture Standard
Due Diligence System (DDS)	A set of steps or actions taken to ensure that due diligence is exercised. The Due Diligence System may consist of written guidelines and procedures describing the due diligence process in detail.
Due diligence	In the context of this Framework, due diligence is considered to define the actions taken by organisations to ensure that the production, processing or sourcing of commodities is done in a responsible way, using a risk-based approach. A general definition of the term is “the care that a reasonable person exercises to avoid harm to other persons or their property”.

Ecosystem restoration	(In relation to environmental harms) The process of assisting the recovery of an ecosystem and its associated conservation values that have been degraded, damaged or destroyed. Source: Accountability Framework definitions
Endangered species	Plant or animal species categorised as endangered by national law or by international organisations, such as the International Union for Conservation of Nature (IUCN). In descending order of threat, the IUCN Red List threat categories are as follows: Extinct or Extinct in the Wild. Critically Endangered, Endangered and Vulnerable: species threatened with global extinction. Source: IUCN
Employer-provided housing	Housing provided to workers by the employer. For healthy and safe housing, the following should be met: ● Employer-provided housing shall be clearly segregated from the factory and production areas and have clearly segregated housing for males and females for respect of privacy, where necessary. ● Employer-provided housing shall be safely built and maintained hygienic. ● Workers shall be able to enter and leave buildings freely. ● Employer-provided housing shall have automatic fire detection and alarm systems. ● Employer-provided housing shall respect personal floor space and minimum cubic air content. ● Employer-provided housing shall be provided with adequate lighting and ventilation. ● Employer-provided housing shall have windows large enough to enable the workers to read by natural light and be constructed to allow fresh air entrance, whether artificial lighting or ventilation turned on. ● Employer-provided housing shall have appropriate ventilation that is properly functioning and maintained. ● Employer-provided housing shall be equipped with sleeping facilities with beds and mattresses above the floor and quiet and dark enough to allow for good sleep quality. ● Employer-provided housing shall enable access to potable water, electricity, clean shower and toilet facilities respecting the right of privacy, sanitary food preparation and storage facilities. ● Employer-provided housing s hall have personal storage equipment with lockable lockers. Source: Adapted from the ILO Workers' housing recommendation. https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R115
Environmental Impact Assessment (EIA)	The systematic process used to identify potential environmental and social impacts of proposed projects to evaluate alternative approaches and to design and incorporate appropriate prevention, mitigation, management and monitoring measures. Source: Based on environmental impact assessment, guidelines for FAO field projects. Food and agriculture organization of the United Nations (FAO). Rome. http://www.fao.org/climatechange/29103-02e9a33753ffc325da1e25250c06c927b.pdf
Fertiliser	Organic or inorganic substances containing chemical elements that improve the growth of plants and the fertility of the soil.

	In inorganic or mineral fertilisers, the nutrients are inorganic salts obtained by extraction and/or physical and chemical processes. The three primary plant nutrients are nitrogen, phosphorus and potassium. Source: OECD. https://stats.oecd.org/glossary/detail.asp?ID=947
Forest	Land spanning more than 0.5 hectares with trees higher than 5 metres and a canopy cover of more than 10 per cent or trees able to reach these thresholds in situ. It does not include land that is predominantly under agricultural or urban land use. Also, see Annex B. Explanatory notes: Forest is determined both by the presence of trees and the absence of other predominant land uses. ● The trees should be able to reach a minimum height of 5 metres in situ. ● It includes areas with young trees that have not yet reached but which are expected to reach a canopy cover of 10 per cent and tree height of 5 meters. It also includes areas that are temporarily unstocked due to clear-cutting as part of a forest management practice or natural disasters, and which are expected to be regenerated within 5 years. Local conditions may, in exceptional cases, justify that a longer time frame is used. ● It includes forest roads, firebreaks and other small open areas; forest in national parks, nature reserves and other protected areas, such as those of specific environmental, scientific, historical, cultural or spiritual interest. ● It includes windbreaks, shelterbelts and corridors of trees with an area of more than 0.5 hectares and a width of more than 20 metres. ● It includes abandoned shifting cultivation land with the regeneration of trees that have or are expected to reach a canopy cover of 10 per cent and tree height of 5 metres. ● It includes areas with mangroves in tidal zones, regardless of whether this area is classified as a land area or not. ● It includes rubber-wood, cork oak and Christmas tree plantations. ● It includes areas with bamboo and palms provided that land use, height and canopy cover criteria are met. ● It includes areas outside the legally designated forest land that meet the forest definition. ● It excludes tree stands in agricultural production systems, such as fruit tree plantations, oil palm plantations, olive orchards and agroforestry systems when crops are grown under tree cover. Note: Some agrofor estry systems, such as the “Taungya” system, where crops are grown only during the first years of the forest rotation, should be classified as forest. Source: FAO FRA 2020. https://www.fao.org/3/I8661EN/i8661en.pdf
Forest degradation	In the context of the EU Deforestation Regulation, forest degradation means structural changes to forest cover, taking the form of the conversion of primary forests or naturally regenerating forest into plantation forest or into other wooded land and the conversion of primary forest into planted forests.

	Source: Text of the EU Deforestation Regulation adopted by the European Parliament on 19 April 2023
Free, Prior, and Informed Consent (FPIC)	A legal condition whereby a person or community can be said to have given consent to an action prior to its commencement, based upon a clear appreciation and understanding of the facts, implications and future consequences of that action, and the possession of all relevant facts at the time when consent is given. Free, Prior and Informed Consent includes the right to grant, modify, withhold or withdraw approval. FPIC is required prior to the approval and/or commencement of any project that may affect the lands, territories and resources that Indigenous Peoples customarily own, occupy or otherwise use in view of their collective rights to self-determination and to their lands, territories, natural resources and related properties. Understanding the terminology associated with FPIC can help companies to effectively contribute to, facilitate, lead and assess FPIC processes: ● Free: Consent is given by the affected Indigenous Peoples (IP) or local communities (LC) voluntarily without coercion, duress and intimidation. ● Prior: The consent is given before the specified activity is authorised or commenced. ● Informed: The consent is given after the Indigenous Peoples or local communities have received the relevant, timely and culturally appropriate information necessary to make a fully informed decision. ● Consent: The IP/LC take a collective decision to grant or withhold approval of the specified activity. Source: United Nations Office of the High Commissioner for Human Rights
Gender equality	Gender equality means that women and men have equal conditions for realising their full human rights and for contributing to and benefiting from economic, social, cultural and political development. Gender equality is, therefore, the equal valuing by society of the similarities and differences of men and women, and the roles they play. It is based on women and men being full partners in their home, their community and their society. Source: UNESCO
Genetically Modified Organism (GMO)	A gas that contributes to the natural greenhouse effect. The Kyoto Protocol covers a basket of six greenhouse gases (GHGs) produced by human activities: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulphur hexafluoride. Annex I: Parties' emissions of these gases taken together are to be measured in terms of carbon dioxide equivalents based on the gases' global warming potential. Source: https://www.eea.europa.eu/help/glossary/eea-glossary/greenhouse-gas
GHG offset	A carbon offset is a reduction in carbon dioxide emissions or other greenhouse gases made to compensate for emissions produced elsewhere. Carbon offsets are measured in tonnes of carbon dioxide equivalent (CO2e). Carbon offset schemes allow individuals and companies to invest in environmental projects around the world to balance out their own carbon footprints. The projects are usually based in developing countries and most commonly are designed to reduce future emissions. This might involve rolling out clean energy technologies or purchasing and ripping up carbon credits from an

	emissions trading scheme. Other schemes work by soaking up CO2 directly from the air by planting trees.
Hazardous work	Hazardous work is defined as work that may expose the worker to one or more of the following: ● Mechanical hazards. Certain equipment poses a cutting or crushing hazard. ● Chemical hazards. Certain substances and compounds pose a chemical hazard. ● Physical hazards. Physical hazards may include noise, machinery vibration, work at elevated heights, cold, heat or unusually high or low air pressure. ● Electrical hazards. A particular electrical hazard is involved in working on live wires or in the vicinity of exposed live components, and in the maintenance and repair of high-tension current equipment and lifts. ● Bodily strain. Bodily strain may result from heavy lifting and other work involving unequal loading. ● Biological hazards. Certain biological factors pose a specific hazard. ● Certain other types of work. Source: https://www.ilo.org/safework/areasofwork/hazardous-work/lang--en/index.htm
High Conservation Value (HCV)	Any of the following values: ● HCV1: Species diversity. Concentrations of biological diversity, including endemic species and rare, threatened or endangered species, that are significant at global, regional or national levels. ● HCV 2: Landscape-level ecosystems and mosaics. Intact forest landscapes and large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance. ● HCV 3: Ecosystems and habitats. Rare, threatened or endangered ecosystems, habitats or refugia. ● HCV 4: Critical ecosystem services. Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes. ● HCV 5: Community needs. Sites and resources fundamental for satisfying the necessities of local communities or Indigenous Peoples (for example, for livelihoods, health, nutrition, water), identified through engagement with these communities or Indigenous Peoples. ● HCV 6: Cultural values. Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or Indigenous Peoples, identified through engagement with these local communities or Indigenous Peoples. Source: FSC standard FSC-STD-01-001 V5-2
Human rights	Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination. Source: United Nations
Illegally harvested wood	Wood that has been harvested in violation of applicable laws related to harvesting in that location or jurisdiction. Source: Adopted from FSC Glossary of Terms (FSC-STD-01-002, updated 19 October 2017).

ILO fundamental conventions	The eight ILO fundamental conventions are: 1. The Forced Labour Convention, 1930 (No. 29) 2. The Abolition of Forced Labour Convention, 1957 (No. 105) 3. The Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) 4. The Right to Organise and Collective Bargaining Convention, 1949 (No. 98) 5. The Equal Remuneration Convention, 1951 (No. 100) 6. The Discrimination (Employment and Occupation) Convention, 1958 (No. 111) 7. The Minimum Age Convention, 1973 (No. 138) and 8. The Worst Forms of Child Labour Convention, 1999 (No. 182) Source: ILO
Indicator	A quantitative or qualitative variable which can be measured or described, and which provides a means of judging whether a Management Unit complies with the requirements of a Criterion. Indicators and the associated thresholds thereby define the requirements for responsible management at the level of the Management Unit and are the primary basis of conformance evaluation. Source: Adopted from FSC Glossary of Terms (FSC-STD-01-002, updated 19 October 2017).
Indigenous Peoples	People and groups of people that are characterised by all of the following point: ● The key characteristic or criterion is self-identification as Indigenous Peoples at the individual level and acceptance by the community as their member ● Historical continuity with pre-colonial and/or pre-settler societies ● Strong link to territories and surrounding natural resources ● Distinct culture and beliefs ● Form non-dominant groups of society and ● Resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities. Sources: ILO, Indigenous and Tribal Peoples Convention, 1989 (No. 169), United Nations Permanent Forum on Indigenous Issues, Factsheet 'Who are Indigenous Peoples' October 2007; United Nations Development Group, 'Guidelines on Indigenous Peoples' Issues' United Nations 2009, United Nations Declaration on the Rights of Indigenous Peoples, 2008.
Industry wage standards	Industry wages are wages paid for all occupations within an industry.
Inventory	In the context of this project, and inventory is interpreted as "a description of". It includes a detailed overview and description of the elements and conditions that are required in CSLs.
Issued / Valid	These terms define the status of a certification.
Land management rights	Land management rights refer to the specific ways in which a piece of land can be used or developed, as designated by local land-use regulations or zoning laws. Land management rights may include the right to build a particular type of structure, the right to operate a specific type of business or the right to farm or extract resources from the land. These rights can be subject to various conditions and restrictions, such as environmental regulations or building codes. In general,

	land tenure rights establish who has legal control over a piece of land, while land management rights specify how that land can be used.
Land tenure rights	transfer or sell the land to others. Land tenure rights are often associated with land ownership but can also be established through leasehold or other forms of tenancy agreements. Land tenure is the relationship, whether legally or customarily defined, among people, as individuals or groups, with respect to land. (For convenience, "land" is used here to include other natural resources, such as water and trees.) Land tenure is an institution, i.e. rules invented by societies to regulate behaviour. Rules of tenure define how property rights to land are to be allocated within societies. They define how access is granted to rights to use, control and transfer land, as well as associated responsibilities and restraints. In simple terms, land tenure systems determine who can use what resources for how long and under what conditions. Source: Food and Agriculture Organization of the United Nations
Legal compliance indicators	Indicators of the Sustainability Framework that require compliance with applicable legislation.
Living wage	The remuneration received for a standard workweek by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, health care, transportation, clothing and other essential needs, including provision for unexpected events. Source: Global Living Wage Coalition
Local community	Communities of any size that are in or adjacent to the Management Unit and also those that are close enough to have a significant impact on the economy or the environmental values of the Management Unit or to have their economies, rights or environments significantly affected by the management activities or the biophysical aspects of the Management Unit. Source: FSC Glossary of Terms (FSC-STD-01-002, updated 19 October 2017).
Low risk	A conclusion, following a risk assessment, that there is a negligible or insignificant risk that material does not meet specific criteria (legal or otherwise) when produced, sourced or traded in a supply chain. Risk mitigation actions are not required for products with the low-risk designation. Note: The term 'negligible' can be considered to mean that the level of risk applied to the material shows no cause for concern in relation to its conformance with the specific criterion after a full assessment is conducted and, where necessary, appropriate mitigation measures are applied. Source: Adapted from Requirements for sourcing FSC Controlled Wood FSC-STD-40-005 and EU Deforestation Regulation 21Dec22 text.
Modern slavery	Modern slavery is defined as situations when people are: ● Forced to work – through coercion or mental or physical threat ● Owned or controlled by an 'employer' through mental or physical abuse or the threat of abuse ● Dehumanised, treated as a commodity

	or bought and sold as ‘ property’ or ● Physically constrained or having restrictions placed on their freedom of movement. Modern slavery can take different forms: ● Forced labour – any work or services which people are forced to do against their will under the threat of some form of punishment; ● Debt bondage or bonded labour – the world’s most widespread form of slavery, when people borrow money they cannot repay and are required to work to pay off the debt, then losing control over the conditions of both their employment and the debt; ● Human trafficking – involves transporting, recruiting or harbouring people for the purpose of exploitation, using violence, threats or coercion; ● Descent-based slavery – where people are born into slavery because their ancestors were captured and enslaved; they remain in slavery by descent. ● Child slavery – many people often confuse child slavery with child labour, but it is much worse. Whilst child labour is harmful to children and hinders their education and development, child slavery occurs when a child is exploited for someone else’s gain. It can include child trafficking, child soldiers, child marriage and child domestic slavery. ● Forced and early marriage – when someone is married against their will and cannot leave the marriage. Most child marriages can be considered slavery. Source: Anti-Slavery International
Natural forests	Natural forest is defined as including both primary forest and naturally regenerating forest. Source: FAO FRA 2020. https://www.fao.org/3/I8661EN/i8661en.pdf
Naturally regenerating forest	Forest predominantly composed of trees established through natural regeneration. Explanatory notes: ● It includes forests for which it is not possible to distinguish whether planted or naturally regenerated. ● It includes forests with a mix of naturally regenerated native tree species and planted/seeded trees, and where the naturally regenerated trees are expected to constitute the major part of the growing stock at stand maturity. ● It includes coppice from trees originally established through natural regeneration. ● It includes naturally regenerated trees of introduced species. Source: FAO FRA 2020. https://www.fao.org/3/I8661EN/i8661en.pdf.
NCR (non-conformance report, or non-conformance report)	These two terms are commonly used by various auditing systems to describe the documentation of non-conformances.
Non-conformance Non-conformity Non-compliance	These terms refer to non-fulfilment of a requirement. In simpler terms this means that some part of the standard has not been correctly fulfilled. Nonconformity is the definitive term in ISO documents. Similar options are used for positive fulfilment of requirements (conformance, conformity, compliance). Compliance is most often used as reference to legal requirement, whereas conformance is referring to voluntary requirements.
Non-conforming	Any material or product that is produced, processed or traded in violation of applicable legislation or the requirements of the Sustainability Framework.

product/material	
Non-forest land	A category containing sub-categories other wooded land and other non-wooded land. These include other wooded land, other natural ecosystems, other land and agricultural land. Source: FAO FRA 2020. https://www.fao.org/3/I8661EN/i8661en.pdf.
Organisation	Individual, company or legal entity responsible for meeting the requirements of this Framework. Organisation covers all legal entities owned or managed directly by that legal entity.
Origin	The geographic source of materials, which at a minimum, must specify the country of production/harvest, and where applicable, sub-national region or farm or forest where the produce was harvested or produced.
Other land	Land that is not classified as agricultural land, forest or other wooded land. Other land may or may not have trees on them. Explanatory notes: ● Land use is the key criterion for distinguishing between forest and other land with or without tree cover. ● It includes built-up areas, mining, barren land, land under permanent ice etc. ● It includes groups of trees and scattered trees (e.g. trees outside forest) in agricultural landscapes, parks, gardens and around buildings ● It includes tree stands in agricultural production systems, such as fruit tree plantations/orchards. ● It includes agroforestry systems where crops are grown under tree cover and tree plantations established mainly for purposes other than wood, such as oil palm plantations. Source: FAO FRA 2020. https://www.fao.org/3/I8661EN/i8661en.pdf.
Other natural ecosystems	Natural ecosystems other than forests that substantially resemble, in terms of species composition, structure and ecological function – one that is or would be found in a given area in the absence of major human impacts. These include human-managed ecosystems where much of the natural species composition, structure and ecological function are present. Explanatory notes: ● They include largely “pristine” natural ecosystems that have not been subject to major human impacts in recent history. ● They include regenerated natural ecosystems that were subject to major impacts in the past (for instance, by agriculture, livestock raising, tree plantations or intensive logging) but where the main causes of impact have ceased or greatly diminished, and the ecosystem has attained species composition, structure and ecological function like prior or other contemporary natural ecosystems. ● They include managed natural ecosystems (including many ecosystems that could be referred to as “semi-natural”) where much of the ecosystem’s composition, structure and ecological functions are present. These include managed natural forests and native grasslands or rangelands that are, or have historically been, grazed by livestock. ● They include natural ecosystems that have been partially degraded by anthropogenic or natural causes (e.g., harvesting, fire, climate change, invasive species or others) but where the land has not been converted to another use and where much of the ecosystem’s composition, structure and ecological function

	remain present or are expected to regenerate naturally or by management for ecological restoration. Source: Accountability Framework definitions
Other non-wooded land	A category that encompasses other natural ecosystems, other land and agricultural land. Source: FAO FRA 2020. https://www.fao.org/3/I8661EN/i8661en.pdf.
Other planted forest	Planted forest which is not classified as plantation forest. Forest predominantly composed of trees established through planting and/or deliberate seeding. Explanatory notes: ● In this context, predominantly means that the planted/seeded trees are expected to constitute more than 50 per cent of the growing stock at maturity. ● Includes coppice from trees that were originally planted or seeded.
Other wooded land	Land not classified as forest, spanning more than 0.5 hectares, with trees higher than 5 metres and a canopy cover of 5-10 per cent, or trees able to reach these thresholds in situ; or with a combined cover of shrubs, bushes and trees above 10 per cent. It does not include land that is predominantly under agricultural or urban land use. Explanatory notes: The definition above has two options: ● The canopy cover of trees is between 5 and 10 per cent; trees should be higher than 5 metres or able to reach 5 metres in situ; or ● The canopy cover of trees is less than 5 per cent, but the combined cover of shrubs, bushes and trees is more than 10 per cent. ▪ It includes areas of shrubs and bushes where no trees are present; ▪ It includes areas with trees that will not reach a height of 5 metres in situ and with a canopy cover of 10 per cent or more, e.g., some alpine tree vegetation types, arid zone mangroves etc. Source: FAO FRA 2020. https://www.fao.org/3/I8661EN/i8661en.pdf.
Ozone depleting substances	Man-made substances that, when released into the atmosphere, damage the stratospheric ozone layer, Earth's protective shield that protects humans and the environment from harmful levels of ultraviolet radiation from the sun. The Montreal Protocol on Substances that Deplete the Ozone Layer controls the global use of these substances. Its objective is to protect the stratospheric ozone layer by phasing out the production of ozone-depleting substances. The protocol covers over 200 individual substances with a high ozone-depleting potential (ODP), including chlorofluorocarbons (CFCs), halons, carbon tetrachloride (CTC), 1,1,1-trichloroethane (TCA), hydrochlorofluorocarbons (HCFCs), hydrobromofluorocarbons (HBFCs), bromochloromethane (BCM) and methyl bromide (MB), all of which are referred to as 'controlled substances'. The controlled substances can be found in annexes A, B, and C of the Montreal Protocol. Source: https://ozone.unep.org/treaties/montreal-protocol/articles/annex-controlled-substances
Plantation forest	Planted forest that is intensively managed and meets ALL of the following criteria at planting and stand maturity: one or two species, even age class and regular spacing. Explanatory notes: ● It specifically includes short rotation plantation for wood, fibre and energy. ● It specifically excludes forest planted for

	protection or ecosystem restoration. ● It specifically excludes forest established through planting or seeding which at stand maturity resembles or will resemble a naturally regenerating forest. Source: FAO FRA 2020. https://www.fao.org/3/I8661EN/i8661en.pdf.
Planted forests	A category including plantation forest and other planted forest. Source: FAO FRA 2020. https://www.fao.org/3/I8661EN/i8661en.pdf.
Planted forest, other	Planted forest which is not classified as plantation forest. Forest predominantly composed of trees established through planting and/or deliberate seeding. Explanatory notes: ● In this context, predominantly means that the planted/seeded trees are expected to constitute more than 50 per cent of the growing stock at maturity. ● It includes coppice from trees that were originally planted or seeded. Source: FAO FRA 2020. https://www.fao.org/3/I8661EN/i8661en.pdf.
Post-consumer reclaimed material	Material that is reclaimed from a consumer or commercial product that has been used for its intended purpose by individuals, households or by commercial, industrial and institutional facilities in their role as end-users of the product and would otherwise have been discarded as waste. This definition, therefore, excludes material that is reclaimed from a process of secondary manufacture or further downstream industry, in which the material has not been intentionally produced, is unfit for end-use and may or may not be capable of being re-used on-site in the same manufacturing process that generated it.
Primary forest	Naturally regenerated forest of native tree species, where there are no clearly visible indications of human activities and the ecological processes are not significantly disturbed. Explanatory notes: ● It includes both pristine and managed forests that meet the definition. ● It includes forests where Indigenous Peoples engage in traditional forest stewardship activities that meet the definition. It includes forest with visible signs of abiotic damages (such as storm, snow, drought, fire) and biotic damages (such as insects, pests and diseases). ● It excludes forests where hunting, poaching, trapping or gathering have caused significant native species loss or disturbance to ecological processes. ● Some key characteristics of primary forests are: ▪ They show natural forest dynamics, such as natural tree species composition, the occurrence of dead wood, natural age structure and natural regeneration processes. ▪ The area is large enough to maintain its natural ecological processes. ▪ There has been no known significant human intervention, or the last significant human intervention was long enough ago to have allowed the natural species composition and processes to have become re-established. Source: FAO FRA 2020. https://www.fao.org/3/I8661EN/i8661en.pdf.
Processing	Processing denotes activities of processing primary commodities or raw materials. Processing may be primary or secondary.
Production	Referred to primary production at the farm or forest level, such as growing crops and trees.
Prohibited chemicals	Chemicals that may not be used by entities verified as complying with the Sustainability Framework. This list has been developed by

	Preferred by Nature, and includes chemicals with active ingredients classified according to at least one of the following criteria: ● Listed in Annex A or B of the Stockholm Convention on Persistent Organic Pollutants (POP) and/or recommended for inclusion in Annex A or B of the Stockholm Convention by the POPs Review Committee (POPRC); ● Listed in the Montreal Protocol on Substances that Deplete the Ozon Layer; ● Listed in Annex III of the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade (PIC) or recommended for inclusion in Annex III by the Chemical Review Committee (CRC); ● Listed in classes Ia and Ib under the World Health Organisation's Recommended Classification of Pesticides by Hazard; ● Classified as reproductive toxicity category 1 or carcinogenic toxicity category 1 or mutagenic toxicity category 1 or carcinogenic toxicity category 2 and reproductive toxicity category 2, according to the Globally Harmonized System (GHS) of Classification and Labelling of Chemicals as implemented/applied by the European Union (Regulation 1272/2008 and Regulation 1107/2009) and by Japan. It should be noted that some pesticides or chemicals on the prohibited list may be used in certain circumstances that limit the risk from said ingredients. As an exception, it is allowed to use rodenticides with active ingredients in the prohibited list to control rodents, but only if the chemical is contained in dedicated bait boxes, thus preventing access for other than the intended purpose. In cases where Preferred by Nature develops a commodity-specific adaptation of the Sustainability Framework, the list of Prohibited Chemicals may be adjusted considering the specifics within the commodity. See Annex A for the list of prohibited chemicals.
Protected species	Animal or plant species protected by national or international law.
Publicly available information	Information that has been published or broadcast for public consumption, is available at request to the public, is accessible online or otherwise to the public, is available to the public by subscription or purchase, could be seen or heard by any casual observer, is made available at a meeting open to the public or is obtained by visiting a place or attending an event that is open to the public.
Records	Written or stored information. Records may mean copies of documents or information stored digitally with information on systems and data collected that can be used to show compliance with the Framework's requirements.
Remediation	Terms used interchangeably or in combination with one another to refer to both the process of providing redress for a negative impact and the substantive outcomes that can counteract, or make good, the negative impact. These outcomes may take a range of forms, such as apologies, restitution, rehabilitation, restoration, financial or non-financial compensation and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition.

	In the context of the Sustainability Framework, remediation activities refer to social issues. Source: Accountability Framework definitions
Responsible recruitment	Responsible recruitment covers issues related to the recruitment process, as follows: ● Medicals shall only be mandated for after an offer of employment has been made and where it is relevant to the safety & health of the individual and those around him/her. ● Pregnancy screening or testing is not used at any time before or after the jobseeker signs an employment agreement, except where required by law. ● Recruitment-related information (including the details of working conditions, worker's legal rights, nature of work, wages and benefits, duration of the contract) and the employment contract shall be provided to a jobseeker in a language they understand. ● Recruitment fees/costs shall not be charged to jobseekers, nor shall deposits for job placement services, from jobseekers, his/her employers, agents, or subagents. ● Recruitment of migrants shall include full transparency about terms, conditions and any employment costs, and the migrants shall be informed about the labour laws applicable in the place of work prior to granting their written consent. ● Only charges or deductions for room and board that are permitted or required by law and are consistent with market rates shall be applied and communicated to jobseekers prior to signing an employment contract. ● Employment contracts shall specify hours of work, including regular hours, requirements for overtime and days off, specify and comply with all legally required breaks, including breaks for prayer, and provide at least one day off every seven days. ● The Organisation shall provide reasonable opportunities for employment, training and other services to local communities, contractors and suppliers proportionate to the scale and intensity of its management activities.
Responsible remuneration	The process of managing workers' remuneration, including: ● Employers shall not engage in making personal loans to workers or jobseekers under circumstances where repayment terms could be defined as debt bondage or forced labour. ● Employees shall not be required to participate in any forced saving scheme unless required by law. ● Employers shall not avoid obligations to employees under labour or social security laws and regulations arising from the regular employment relationship using labour-only sub-contracting, home-working arrangements, or apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be purposefully avoided through the excessive use of fixed-term contracts of employment. ● Wage calculations shall be transparent, equitable and objective, including for remuneration based on production, quotas or piecework and overtime hours shall be specified separately. ● Recognition and promotion processes and practices shall be made based on worker performance, without discrimination and with the aim to provide equal opportunities for empowerment. ● Deductions from wages as a disciplinary measure shall be prohibited, nor shall any deductions be made from wages without the expressed permission of the worker concerned.

	● All disciplinary remuneration measures shall be recorded.
Rights holder	Any person, group of persons or entity (typically Indigenous Peoples or other local communities) who holds customary or legal use rights in accordance with the UNDRIP (United Nations Declaration on the Rights of Indigenous Peoples) and national laws or traditions.
Species	A group of living organisms consisting of similar individuals capable of exchanging genes or interbreeding. The species is the principal natural taxonomic unit, ranking below a genus. The common and (where applicable) the full scientific name is required for all species included within the scope of the management system.
Specified risk	A conclusion following a risk assessment that there is a risk that illegal or otherwise non-conforming products may enter the supply chain. In such cases, risk mitigation is required. Note: The term 'specified' can be considered to mean that the level of risk applied to the material shows cause for concern in relation to its conformance with the specific criterion, after a full assessment is conducted.
Stakeholder	Any person, group of persons or entity that is or is likely to be subject to the effects of the activities of a Management Unit. Examples include but are not restricted to persons, groups of persons or entities. The following are examples of affected stakeholders: ● Local communities; ● Indigenous peoples; ● Workers; ● Neighbours; ● Landowners; ● Local processors; ● Local businesses; ● Tenure and use rights holders, including landowners; ● Organisations authorised or known to act on behalf of affected stakeholders, for example, social and environmental NGOs, labour unions, etc. Source: FSC-STD-01-001 V5-2
Stakeholder Consultation	To engage with stakeholders through a consultation process that includes in-person meetings, facilitated workshops and topic-based webinars.
Substantiated complaint	A grievance or objection raised against an organisation regarding its certification, due diligence system or timber legality risk, which is accompanied by or is found to be established by proof or competent verifiable evidence.
Sub-supplier	Any entities further up the supply chain supplying material to the suppliers or other sub-suppliers.
Supplier	The entity that supplies material to the organisation.
Supply chain	The route of products and entities that take legal ownership of the products from the source area – where the material is harvested or produced – to the organisation that takes final ownership of the material.
Suspension	*Suspension* refers to the temporary ceasing of a certification validity. A suspension may occur under specific situations, such as where a certificate holder fails to meet certification requirements as part of an annual audit or to meet certification requirements detailed in a certification agreement.

Termination	*Termination* refers to the definitive end of a certification. A termination may occur prior to the end of the certification period (i.e. prior to the expiration date).
Threatened species	Species that meet the International Union for Conservation of Nature's (IUCN) (2001) criteria for Vulnerable (VU), Endangered (EN) or Critically Endangered (CR), and are facing a high, very high or extremely high risk of extinction in the wild. Source: Based on IUCN. (2001). IUCN Red List Categories and Criteria: Version 3.1. IUCN Species Survival Commission. IUCN. Gland, Switzerland and Cambridge, UK
Waste	Waste means any substance or object the holder discards, intends, or is required to discard. In the context of the Sustainability Framework waste, may encompass a range of different materials. Source: EU Waste Framework Directive. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L0851&from=EN
Worker, migrant	A person who migrates from one country to another with a view to being employed otherwise than on his own account and includes any person regularly admitted as a migrant for employment. Source: ILO Migration for Employment Convention (Revised), 1949 (No. 97). https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::p12100_instrument_id:312242
Worker, permanent	Permanent workers work for an employer and do not have a predetermined end date for employment. The definition of a permanent worker may include different types of employment, covering any person who works on a farm, forest or for a group administrator and is paid for his or her work. In terms of the requirements of the Sustainability Framework, permanent workers can encompass different types of workers, including documented, undocumented, migrant, workers of sub-contractors and outsourced workers, as well as persons temporarily absent from a job or enterprise at which they recently worked for illness, parental leave, holiday, training or industrial dispute.
Worker, seasonal	A seasonal worker is a worker who is under a form of temporary employment linked to specific periods of the year and sectors (for example, fruit pickers in the agricultural sector). Seasonal workers may also encompass different types of workers, as is the case with permanent workers.
Water bodies	Water bodies include, but are not limited to, water courses, rivers, streams, lagoons, springs, lakes, reservoirs and ditches.
Young worker	Any worker under the age of 18 but over the age of a child (15). Source: Social Accountability Standard 8000- 2014