

FSC's feedback on the EU Sustainable Products Initiative

The Forest Stewardship Council (FSC), the pioneer of forest certification with nearly 50 million of forest hectares certified in Europe, strives to support the EU Commission in making products more sustainable. In this framework, FSC recommends the following:

1. Design for renewables: incentivising renewables to decarbonize the economy

If managed sustainably, renewable materials such as wood are circular by nature because they regrow naturally (1). By replacing fossil-based materials with renewable materials the EU Commission can reduce dependency on finite resources whilst reducing carbon emissions. For instance, wood-based textiles have a climate mitigation effect of 5 kg CO₂ per kg of product used compared to polyester (2). The use of renewable materials thus offers opportunities to bind carbon in products and act as carbon stocks (3).

2. Design for sustainability: including responsible sourcing among the sustainability principles

Sustainable products start with **sustainable raw materials**. Responsible sourcing makes sure that resources are managed in a way that respects people, animals and the environment (4). Responsible sourcing is therefore the **precondition for an effective sustainable circular economy** (5). This is because it helps eliminating sustainability risks in the supply chain by including social and environmental considerations already at the sourcing level (6).

3. Co-design for sustainability: Recognising third-party certifications driving sustainable objectives as proxy for compliance with EU sustainability principles

One easy way to foster responsible sourcing is recognising ready-made robust responsible sourcing standards embedding both **environmental** and **social** considerations, such as the ones respecting ISEAL's credibility principles (7). For instance, FSC certification ensures that forest-based products come from responsibly managed forests providing **environmental, social and economic benefits** – hence, in line with the EU Green Deal (8). While voluntary, these approaches can effectively **complement** legislative measures by nudging companies in disclosing responsible sourcing commitments with measurable climate friendly targets which are easy to verify (9). This makes sure that **sustainability is present already at the sourcing level in the supply chain**. Given the above, FSC recommends the EU Commission to recognize robust voluntary sustainability standards as a proof of compliance with the EU sustainability principles, as per option already adopted under RED II (10).

Evidences

- (1) Marc Palahí, Justin Adams, *Why the world needs a 'circular bioeconomy' - for jobs, biodiversity and prosperity, 2020, World Economic Forum*. Available [here](#).
- (2) T. Ronzon, M. Lusser, M. Klinkenberg (ed.), et al *Bioeconomy Report, 2016*. JRC Scientific and Policy Report. EUR 28468 EN, available [here](#).
- (3) Leskinen, P., Cardellini, G., Gonzalez-Garcia, S., Hurmekoski, E., Sathre, R., Seppälä, J., Smyth, C., Stern, T., Verkerk, P.J., 2018. Substitution Effects of Wood-Based Products in Climate Change Mitigation. From Science to Policy 7, European Forest Institute. Available [here](#).
- (4) Ellen MacArthur Foundation, *Completing the Picture: How the Circular Economy Tackles Climate Change (2019)*, available [here](#).
- (5) UN Environment Programme and the UN Industrial Development Organization (UNIDO), Climate Technology Centre and Network, *Carbon sink and low-carbon building materials*, available [here](#).
- (6) Ellen MacArthur Foundation, *Completing the Picture: How the Circular Economy Tackles Climate Change (2019)*, available [here](#).
- (7) ISEAL's Credibility Principles, official webpage, available [here](#).
- (8) FSC Contributions to Achieving the Sustainable Development Goals, official webpage, available [here](#).
- (9) Kerstin Weber, Jenny Walther-Thoß, Martina Fleckenstein, *Deforestation-free supply chains: Concepts and implications, 2016*, WWF Deutschland, available [here](#).
- (10) EU Commission, Energy, Renewable Energy, Biofuels, Voluntary schemes, official webpage, available [here](#).

About FSC

FSC has 25 years of experience in sustainable forest management and is widely regarded as the world's most trusted forest certification system. FSC uses its expertise to promote the responsible management of the world's forests, bringing together experts from the environmental, economic and social spheres. FSC develops the standards that define how forests can be managed sustainably and provides a label for businesses to show their products originate from these certified forests. FSC standards are based on ten core principles designed to prevent deforestation and degradation, and safeguard biodiversity, water quality, carbon storage, and Indigenous Peoples' and workers' rights, among other key environmental and social values. More [here](#).