



Forest Stewardship Council®



PSU Review Report

of

FSC-STD-40-004a

FSC Product Classification (V2-1)



Status:	Final
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PSU Review Report

The Forest Stewardship Council (FSC) is an independent, not for profit, non-government organization established to promote environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

FSC's vision is that the world's forests meet the social, ecological, and economic rights and needs of the present generation without compromising those of future generations.

Summary and recommendation

Reviewed Document

Document code	FSC-STD-40-004a
Document title	FSC <i>Product Classification Standard</i> addendum V2-1
Objective of document	The FSC <i>Product Classification Standard addendum</i> V2-1 stipulates the product type nomenclatures that shall be used by certificate holders for the purpose of classifying FSC Product Groups.
Last approval date	16 December 2013
Review triggered by	<input checked="" type="checkbox"/> Regular review as scheduled
	<input type="checkbox"/> GA Motion or Board decision
	<input type="checkbox"/> New or changed FSC policies or legislation
	<input type="checkbox"/> Change Requests
	<input checked="" type="checkbox"/> Other (please specify):
Reviewer	Name: Vicky Tran
	e-mail: v.tran@fsc.org
Draft Review Report	12 October 2020
Public consultation	23 February to 24 March 2021
Final Review Report	16 September 2021

Recommendation

<input type="checkbox"/>	Full revision
<input checked="" type="checkbox"/>	Minor revision ¹
<input checked="" type="checkbox"/>	Editorial revision
<input type="checkbox"/>	No revision
<input type="checkbox"/>	Withdrawal

¹ According to FSC-PRO-01-001 V3-1 Annex 4

Note

If the need for revision is concluded in and supported by stakeholders, the report will be presented to the FSC Board of Directors for decision making. If approved by the FSC Board of Directors, the reviewed document will then undergo a revision process as described in procedure FSC-PRO-01-001 V3-1.

I. Introduction

This report has been developed according to FSC-PRO-01-001 V3-1 Clause 9.6 to review and assess the continued relevance and effectiveness of a normative document. This is a mandatory step before a normative document can be taken to a revision process. In addition, it responds to the FSC Board of Director's requirement for a feasibility and impact analysis for all review and revision processes, mandated at their 71st Meeting.

II. Proposed recommendation and justification (narrative)

The FSC *Product Classification* (FSC-STD-40-004a) is an addendum to the FSC *Chain of Custody Standard* that provides the English nomenclatures and codes that certificate holders shall use to classify their product group/types.

This document version was last published in December 2013 and covers a wide range of forest products. However, over the years, multiple stakeholders have contacted FSC requesting the inclusion of new products and the correction of some nomenclatures.

PSU recommends initiating a revision process of FSC-STD-40-004a to update the product classification. This revision is not expected to change the existing product types, but it is an update to address ambiguities and gaps in the current classification. Therefore, we do not foresee significant impacts on stakeholders.

Since the last approval and update of the standard addendum, the application of new FSC input and output product groups have diversified and grown from biopolymers to forest-based textiles.

There is ambiguity on how certain product classifications should be applied when there is no obvious or clear match for a product type, and stakeholders would benefit from additional instructions on the application of the product classification. It is known that certificate holders and their certification bodies are interpreting the product classifications differently – this is an integrity risk for FSC as product groups and species information provide a mechanism to check the validity of products.

At the time that the product classification was developed, FSC decided to not prescribe whether companies should use level 1, 2 or 3 of the product classifications. They shall use the terminology that best describes their products. However, we are aware that some companies want to use level 1 to include, for example, the widest range possible of products under a credit account. This should not be the reason for a company to choose a product type, since the requirements regarding product groups cannot be disregarded.

Currently, PSU recommends applying levels 2 or 3 of the product classification first, as long as the requirements about product groups specified in section 7 of the FSC-STD-40-004 V3-0 are met. However, if there's no accurate product type at level 2 or 3, it is sufficient to choose the appropriate or the closest level 1 classification. To clarify a general misunderstanding, if the product classification is not listed, it is incorrect that the product cannot then be FSC certified.

Also, there are different understandings around if a certificate holder's scope contains only a Level 1 classification. Many think that it means that they can or may produce or purchase all the raw materials or products within that classification. This needs to be clarified within the revised version of the addendum.

In addition, the addendum has not been reviewed since its approval in 2013 which has exceeded the review and revision cycle of FSC normative documents which are usually reviewed in Year 3 or 4 after publication.

Proposed recommendations and justification

PSU recommends conducting a revision of the standard addendum FSC-STD-40-004a V2-1 based on the following reasons and to also ensure the document is aligned with changes that have been made in other parts of the normative framework:

- a. **Expansion and inclusion of forest-based textiles and fibre product classifications:** There is a steady growth of FSC certificates in the textile sector, with a total of 136 textile companies who have become FSC certified worldwide between 2014 and June 2019¹. This is driven partly due to the increase in brands committing to sourcing responsible man-made cellulosic fibres in response to consumer demand. As a result, we have received enquiries by stakeholders on how to apply the existing product classification to textile products and request to update it to include textiles.
- b. **Introduction and expansion of biofuels:** The Roundtable on Sustainable Biofuels (RSB) recognizes FSC standards for responsible forest management. After comparing the Principles and Criteria from the FSC and RSB standards respectively, RSB concluded that the two are aligned. This means that in most cases, FSC certified forests can be considered as complying with RSB's Principles and Criteria². This will increase the supply of sustainable forestry products to biofuel and bioenergy producers.
- c. **General update of terminology and references:** There is a clarification requirement on some terminology (i.e., tissue paper) and a need to tighten the definitions of product types in Product Classification.
- d. **Add to existing product levels:** Expanding existing product groups into more detailed levels, providing additional terminology and remove ambiguity.
- e. **General guidance for certification bodies and certificate holders:** Provide guidance on how to apply and identify the product classification and what to do if it's unclear as to what classification to use for the certificate scope. This will increase quality and consistency in practice and data.
- f. **Provide examples:** Include examples on selecting the appropriate classification for the establishment of product groups.

In addition, during the revision PSU can consider exploring a major revision of the product classification to consider adopting the ASI product classification structure or international standard for product classifications, such as:

- **Harmonized Commodity Description and Coding Systems (HS):** an international standard for reporting goods to customs and other government agencies. The code consists up to 8 digits, every digit representing the type of raw material, unprocessed product, semi-finished product, and finished product.
- **Nice Classification (NCL):** an international classification of goods and services applied for the registration of marks.

¹ Source: Steady Growth of FSC Certificates in the Textile Sector, <https://fsc.org/en/newsfeed/steady-growth-of-fsc-certificates-in-the-textile-sector>

² Source: The Roundtable on Sustainable Biofuels recognizes FSC certified forests, <https://fsc.org/es/node/26519?page=%2C0%2C10%2C18%2C34>

- **The International Standard Industrial Classification of All Economic Activities (ISIC):** consists of a coherent and consistent classification structure of economic activities based on a set of internationally agreed concepts, definitions, principles and classification rules.
- **Standard International Trade Classification (SITC):** is a product classification of the United Nations (UN) used for external trade statistics (export and import values and volumes of goods), allowing for international comparisons of commodities and manufactured goods.

With the introduction of blockchain technology, it may be possible to incorporate these classifications to be linked with each tracked claim or product.

III. Impact analysis

Internal

In proceeding with a minor revision of FSC-STD-40-004a V2-1, there is no major impact expected from this process. PSU anticipates the proposed changes to have a minor impact on some network partners who have been a major source of feedback regarding the review of the product classification.

Regardless of a minor or major revision, there will be an impact on resources within FSC International. The legal team will also need to register the trademark classes for the new product classifications. The TIU (Technology and Information Unit) team will have to update FSC databases (<https://info.fsc.org>) and update data for the development of blockchain technology. The trademark team may need to add some additional product types for the labels.

Overall, a major revision with the implementation of an entirely new classification system will require intense resource capacities for implementation. As the standards are modified and updated, FSC must ensure that our systems include the updates, therefore not allowing FSC the full control over updates and revisions or the addition of appropriate categories if adopting an international standard.

External

PSU does not anticipate the proposed changes to this addendum to put a heavy burden on certificate holders. The changes to the addendum will make the application of the product classification clearer and more consistent. Therefore, PSU anticipates the proposed changes to this addendum to put a medium burden on certificate holders and certification bodies who may need to update the scope of the certificates and for certificate holders to potentially change the 'product type' on their FSC label used on products. The requirements will be more consistent, which will facilitate consistency of certification body evaluations and that will result in increased credibility of the FSC system.

However, with the adaption of a completely new product classification system, there will be major impacts on both certificate holders and certification bodies. They will need to update their products scopes (i.e., certificates), documentation, labels etc.

IV. Stakeholder consultation and feedback

Methodology

An international stakeholder consultation will be initiated, and stakeholders will be invited to provide comments and feedback on the draft review report via the FSC Consultation Platform. To ensure that all relevant stakeholders participate in the consultation the following communication channels will be applied:

- Email announcement on the CB Forum and Accreditation mailing list
- Email announcement on the network mailing list and/or a news item on Branching Out
- News item on the FSC website
- News item on the FSC members' portal
- News item on the FSC trademark portal

To facilitate the consultation, the following type of questions will be included to guide participants:

- Guided questions.
- General questions about the review report (e.g., Do you agree with the proposed changes to in Section X, Clause X? Please elaborate your response).
- Single-answer questions, these questions allow only one response to be chosen (e.g. What option do you prefer for ...?).
- Ranking questions (e.g., What is your overall impression of the proposed changes? Very positive to Quite negative).

The period to submit comments on the draft review report will be thirty (30) days from its publication.

Results

From 23 February to 24 March 2021, **60 stakeholders** participated during public consultation for this review report. As can be observed in figure 1, the countries with the highest representation among stakeholders are United States (20%), Germany (10%), Brazil (10%) and Italy (7%).

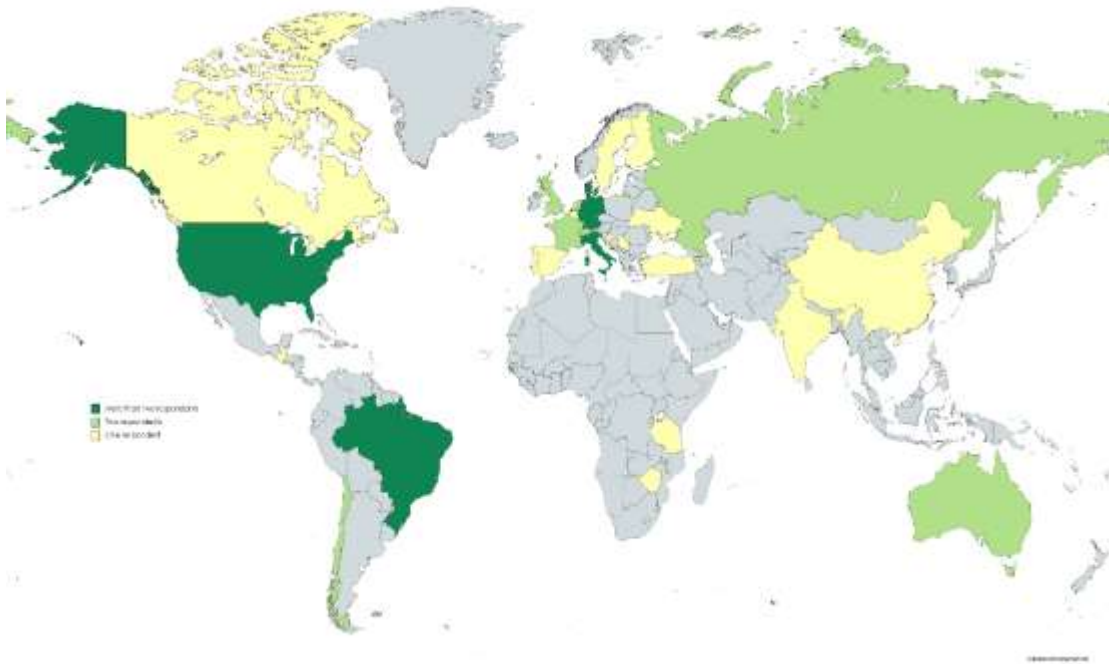


Figure 2 Map representation of stakeholders by country.

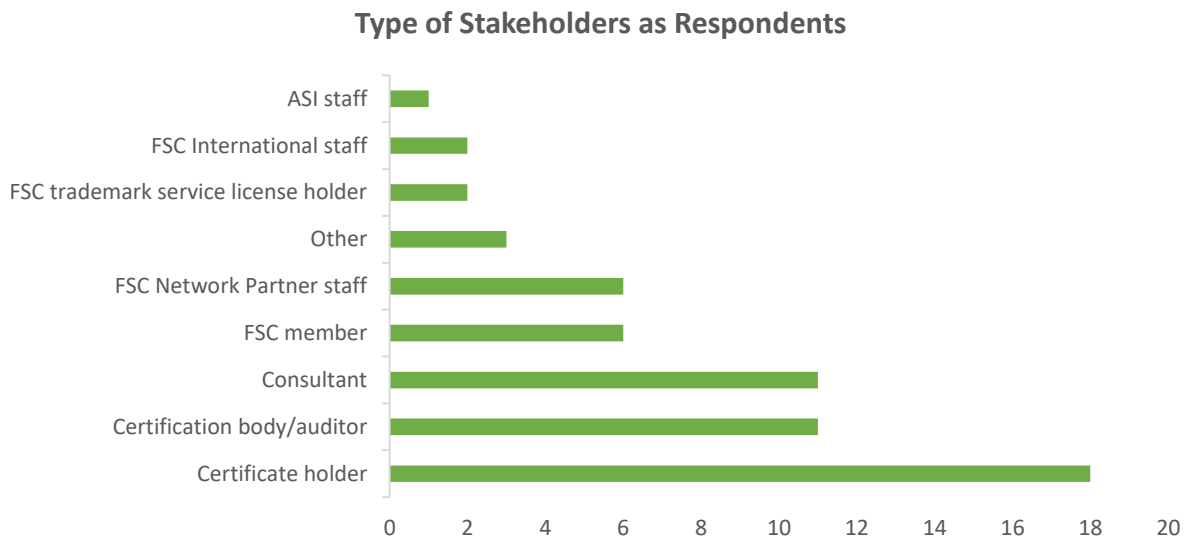


Figure 3 Type of stakeholders that participated during the consultation.

Figure 3 shows the type of stakeholders that participated. Those with the highest participation were certificate holders (30%), both certification bodies and consultants (18 %) participated respectively, followed by FSC network partners and FSC staff, (both 10%). FSC members covered both the global North and South, as well as the three chambers: Social, Environmental and Economic. The Economic North chamber has the highest representation.

Stakeholder type by chamber and divided by North-South

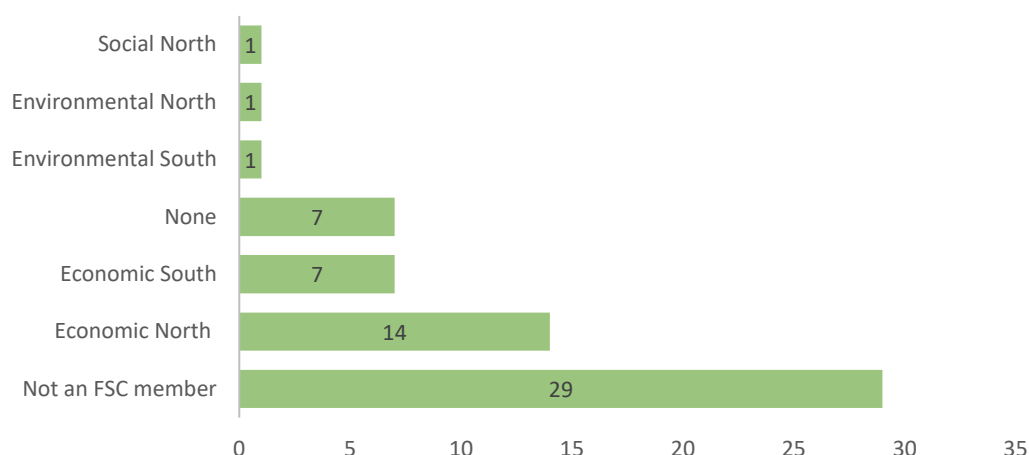


Figure 4 Stakeholder type by chamber and divided by North-South.

Apart from the responses to the ranking and single-answer questions where most participants provided an answer (related to the agreement with the main aspects of the review report such as identified drivers, impacts, annexes, and recommendation for revision), stakeholders also provided specific comments to the general and guiding questions.

Synopsis of stakeholder feedback

This section contains a summary of the most relevant stakeholder comments that were received during the consultation, divided by the following topics. For more details, please refer to Annex B.

Out of the 39 responses received in terms of sharing general comments about the proposal, 62% of stakeholders' impression of the review report was somewhat neutral, positive, and very positive.

Key positive themes:

1. Participants mentioned that the granular level of product classification would reduce confusion but also emphasized the need for a simplified and unambiguous system. This can be approached by rationalizing the classification system so there are no duplicate or near-duplicate options in the system.
2. Stakeholders would like to see product classification entry become a requirement and have certificate holders indicate only those products they currently offer or are likely to offer within the next audit period rather than the current reporting which allow certificate holders to choose whatever classifications they want.
3. Participants also proposed aligning the FSC product classification system with an international product classification system(s).
4. Participants emphasized the need for an updated product classification since they feel that the current product classification system is outdated given that the last document version is from 2013.

5. Stakeholders would like to see the revision of the content done in a manner that minimizes interpretations by certificate holders but also within certification bodies to ensure equal "business rules" to all certificate holders.
6. Stakeholders expect the document to be consulted further online with the normal requirements for a revision to ensure that stakeholders have the appropriate opportunity to provide input. They also urge FSC to have more direct outreach to FSC certificate holders and others in the industry to really understand and determine which approach is best.
7. Stakeholders foresee significant impacts on their supply chain with a more granular classification of products.
8. Stakeholders expect a framework through which minor revisions can be incorporated into the document annually which ensure that the standards are well-equipped to handle the additional upcoming products.
9. Stakeholders suggests using a trade name, or market terminology for classification.

Whereas 38% of stakeholders see no advantage in changes.

Key negative themes:

1. Stakeholders foresee that the proposed update/change will create additional work and require much more time and energy and will add significant costs for certification bodies and certificate holders with IT systems/databases, administrative changes, and product records. Many stakeholders disagree with the statement in the proposal saying that "PSU does not anticipate the proposed changes to this addendum to put a heavy burden on certificate holders." Participants think that these changes will have a cumulative effect in the system and create additional cost.
2. Stakeholders do not see any value in going down to 2nd or 3rd level of information related to products.

Keep the existing product classification: *Which option do you prefer for revising the product classification?*

The overwhelming response came in favor of the choice of: "*Keeping the existing product classification structure but expand on existing product types/levels, include new product types and categories*". The following figure gives an overview of the responses.

Which option do you prefer for revising the product classification?

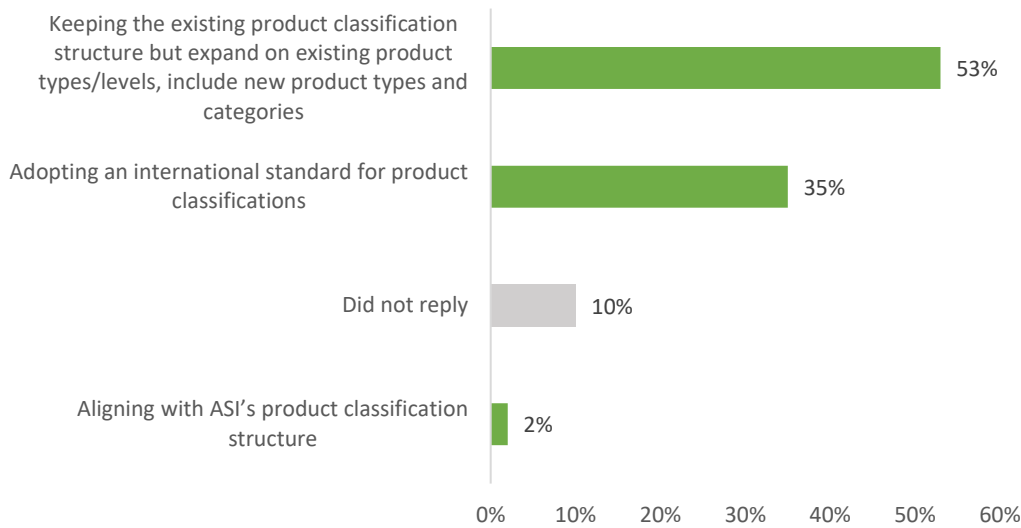


Figure 5 Stakeholder response on preference for revising the product classification.

Adopting an international standard for product classification: If an international standard for product classification is adopted, which one do you recommend?

The following questions are related to adoption of an international standard for, out of 39 responses, most participants were in favour of adopting the ‘Harmonized Commodity Description and Coding Systems (HS)’. The overwhelming response, however, in “other” section was an emphasis on keeping the FSC system and not adopting any other international standard. Another recommended international standard mentioned was PEFC. The figure below gives an overview of responses.

If an international standard for product classification is adopted, which one do you recommend?

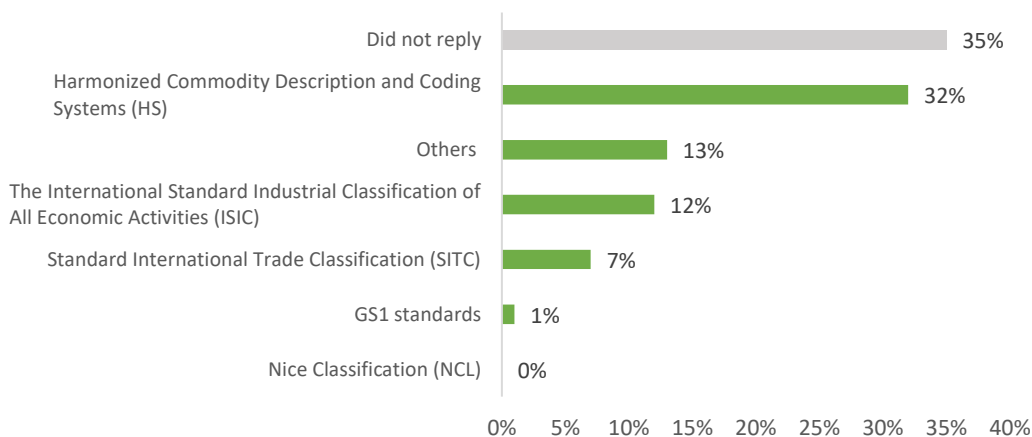


Figure 6 Stakeholder response on preference for adopted international standard.

Overall impression of the impact analysis

On impact analysis, most participants, out of 54 participants, gave a positive response.

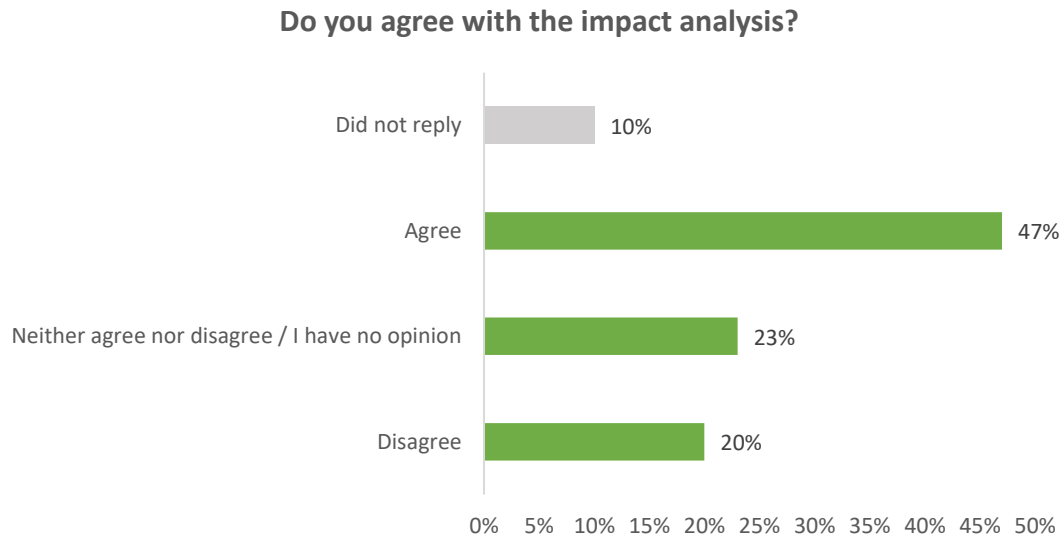


Figure 7 Stakeholder response on impact analysis

Impact identified by stakeholders: *Are there any impacts that we have not identified? Please specify and elaborate on your response:*

Participants were asked to identify any impact that FSC might have missed. The following are some key points from responses given by 25 participants:

- Stakeholders reiterate that a major revision would have a large impact for both certificate holders and certification bodies, as this would require revisions to verification tools and data management system.
- The current impact analysis does not show explicit links to FSC International 2021-2026 global strategy.

Synopsis of comments for Annex A

The following is a synopsis on the comments participants provided on Annex A. For more detail, please refer to Annex B.

Keep the existing structure of the addendum but...

- Allow for more detail and simplification but no duplicates or near-duplicate options.
- Add, clarify, and align product group definitions, product type, product classification in the normative framework since there are conceptual differences.
- Add clarification regarding terms and definitions (i.e., laminated vs melamine or wood fiber fleece vs wood wool, plank vs beam vs batten etc.).
- Do not move or rename existing codes.
- Include more examples for product classifications.
- Translate the addendum to other languages (i.e., Mandarin and Spanish) to allow for accuracy.
- Reflect industry terminology and language.

Allow for a different way of doing things:

- Allow for a process where minor revisions/updates can routinely stay relevant for new products.
- Digitalize the addendum which allows it to be searchable and easy to update.
- Add information on the product group level on whether a product is recycled or virgin
- Clarification on how and when products classification can be added to database/certificate scope for certification.
- Clarify that if a product classification is not listed it does not mean it cannot be eligible for certification
- Make the classification of levels 2 and 3 mandatory however some stakeholders do not see any value in going down to levels 2 and 3.

Additional/new product classifications

In addition to adding new products to existing product categories, there are suggestions to add 'services'. For example, ecosystem services, such as beehive's locations (for honey production or for pollination next to agricultural sites), fishing locations, forest therapy locations, climbing locations, etc. Suggested new products under existing product categories are as follows:

Wood products	Pulp and Paper Products	NTFPs
<ul style="list-style-type: none">• Firewood• Sawlogs and pulpwood• Cuttings• Kitchen → carcass structure, base and tall units, wall units, Kitchen countertops, shelves, and worktops• Seed as food and propagation• P5.6 Moulded bottles• W9.6 Mass Timber Construction (MTC)	<ul style="list-style-type: none">• P3.7 Specialty paperboard• P4.4 Honeycomb paperboard• Follow the industrial process of the textile industries: 1-Fiber, 2-Yarn, 3-Fabric, 4-Textile product.• 'Bio-composites' or 'Pulp reinforced plastic composite'	<ul style="list-style-type: none">• Add (more) cork-based products.• Add N5.12 Other bamboo products• Add N5.X bamboo veneer.• N7.2 include resin as an example• Charcoal from non-wood forest products (babassu)• N9.9 Other food - E.g., Coconut milk

- | | | |
|---|---|---|
| <ul style="list-style-type: none"> • W9.6.1 Glue-laminated timber (glulam) • W9.6.2 CLT (Cross Laminated Timber) • W9.6.3 Nail-laminated timber (NLT or nail-lam) • 'W9.6.4 Dowel-laminated timber (DLT)', 'W9.6.5 Other MTC' • Add Luminaire • Add Coal briquettes • Wood wool igniters • Pastry brushes as W16.11 | <ul style="list-style-type: none"> • P7.11 Cardboard coffins • Adhesive tape • Wrapping tissue • P6.7, add paper straws, face masks, diplomas, and certificates as examples, invitations, greeting cards, forms, medical prescription, letterhead, (as examples). • Recycled viscose or the process of dissolving existing viscose into liquid form again • Drinking straws • Cardboard toys • Paper face marks | <ul style="list-style-type: none"> • Add flavouring products • Add timber-based sweeteners (Xylose and Xylitol) • C1.2.1 - Charcoal breeze (for lighting a fire) - E.g., barbecue charcoal. • C1.2.2 - Charcoal breeze (other use) - E.g., Active charcoal • Add green energy such as bio-methanol as a product • Add Linoleum. • Printed non glued • Biomass • Green energy such as bio-methanol as a product |
|---|---|---|

Reclassifications:

Wood products	Pulp and Paper Products	NTFPs
<ul style="list-style-type: none"> • Impregnated wood category • Kitchen countertops to parts for Kitchen series • 'W9.6 Glued laminated timber (GLULAM)' to 'W9.6 Mass Timber Construction (MTC)' 	<ul style="list-style-type: none"> • 'P2.4.13 Adhesive paper', 'P7.7 Gummed paper' and 'P7.8 Adhesive labels' • Paperboard and Honey-Comb paperboard are in P3.7 and an in P4.4, leading to confusion • Reducing P7 and P8 on the general Level 1 "Printing Products" as it has no additional value to split printing items P7 Stationery of paper (printed and unprinted) to P7 Stationery of paper (printed and unprinted) and manufactured pulp and paper products • Paper scrap (not P10) to 'Recovered cellulose fibre' • C1. Cellulosic derivatives as level 1 	<ul style="list-style-type: none"> • Development of new bamboo categories as identical to the use of solid wood, paper, and chemistry. • Reclassify 'bamboo' as 'wood'. • C1 Lignocellulose is not a category of product, it's a biomaterial made of cellulose, hemicelluloses, and lignin • C2 Hemicellulose and derivatives, not precise enough to be used • C11, Alcohols/Biofuels can be reclassified with C12 Platform chemicals

Remove:

Wood products	Pulp and Paper Products	NTFPs
<ul style="list-style-type: none">• W19 - Other wood products• W9.9 Treated/compressed/delignified wood/fibres is already represented under 'W4 Impregnated/treated wood', 'W9.10 Compressed wood' and 'W9.11 Wood-plastic composites'.	<ul style="list-style-type: none">• PX.X.X Bacterial cellulose (BC), electro spun cellulose nanofiber (ECNF)• P2.6 Tissue paper	<ul style="list-style-type: none">• Remove C1.2.2 - Coconut charcoal add C1.2.3 - Other types and purpose.

V. Annex A

Main aspects to be considered for a minor revision of FSC-STD-40-004a V2-1

Item to be revised	Justification/concern												
A Scope	Add additional information if a product type/classification is not listed it does not mean that it cannot be certified.												
B Effective date													
C References	Project certification standard												
D Terms and References	<p>Considering introduce a definition for 'P6 Tissue paper' it is seen as ambiguous and is interpreted differently by different stakeholders, some have suggested to remove it altogether. It is also compared to 'P6 House and sanitary pulp and paper products'.</p> <p>Suggested definition:</p> <p>Tissue paper (P2.6): Tissue paper in the context of this addendum is a lightweight, thin, and soft paper, typically used for facial tissue, wrapped in small boxes or plastic.</p>												
FSC Product Classification													
FSC Product Classification	<p>In addition, with the existing text provide additional instructions on how to apply the product level classifications.</p> <p>Suggested text:</p> <p>"It is recommended to first apply Levels 2 or 3, if there's no accurate product type at Level 2 or 3, it is sufficient to choose the appropriate or the closest Level 1 classification."</p>												
WOOD PRODUCTS													
W1 Rough wood	<p>Include a Level 3 to add additional transparency when a certificate holder applies the credit system for 'W1.1 Roundwood (logs)' within their certificate scope when they use both pulpwood and saw logs.</p> <table border="1" data-bbox="341 1279 1407 1473"> <thead> <tr> <th>Level 1</th> <th>Level 2</th> <th>Level 3</th> <th>Examples</th> </tr> </thead> <tbody> <tr> <td>W1 Rough wood</td> <td>W1.1 Roundwood (logs)</td> <td>W 1.1.1 Sawlogs</td> <td></td> </tr> <tr> <td></td> <td></td> <td>W 1.1.2 Pulpwood</td> <td></td> </tr> </tbody> </table>	Level 1	Level 2	Level 3	Examples	W1 Rough wood	W1.1 Roundwood (logs)	W 1.1.1 Sawlogs				W 1.1.2 Pulpwood	
Level 1	Level 2	Level 3	Examples										
W1 Rough wood	W1.1 Roundwood (logs)	W 1.1.1 Sawlogs											
		W 1.1.2 Pulpwood											
W2 Wood Charcoal	<p>Remove 'W2 Wood Charcoal' as a Level 1 product classification, it will be included in a new product category 'C1 Chemical Raw Materials and Further Processed Products (CRRPS), C1.2 Charcoal'.</p> <table border="1" data-bbox="341 1720 1407 1854"> <thead> <tr> <th>Level 1</th> <th>Level 2</th> <th>Level 3</th> <th>Examples</th> </tr> </thead> <tbody> <tr> <td>W2 Wood Charcoal</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Level 1	Level 2	Level 3	Examples	W2 Wood Charcoal							
Level 1	Level 2	Level 3	Examples										
W2 Wood Charcoal													
W3	Re-number W3 to W3 and include a new Level 2 category.												

Wood in chips or particles	Level 1	Level 2	Level 3	Examples
	W3 W2 Wood in chips , fibres or particles	W2.8 Wood fibre fleece		
W7 Wood panels	Level 1	Level 2	Level 3	Examples
	W1 Wood panels	W7.4 Special boards		E.g. Three-layer board, honeycomb boards, hollow structural board, sandwich boards, composite boards
W8 Wood panels	Add new Level 3 categories 'W8.2.9 Veneered Oriented Strand Board (OSB)' and 'W8.3.5 Veneered fibreboard (MDF)'.			
	Level 1	Level 2	Level 3	Examples
	W8 Wood panels	W8.2 Particleboard	W8.2.9 Veneered Oriented Strand Board (OSB)	
		W8.3 Fibreboard	W8.3.5 Veneered fibreboard (MDF)	
W9 Engineered wood products	Include new categories in Level 2 for 'W9 Engineered wood products'.			
	Level 1	Level 2	Level 3	Examples
	W9 Engineered wood products	W8.9 Treated/ compressed/ delignified wood/ fibres OR Modified wood	W8.9.1 Cross-laminated timber (CLT)	E.g. Resin-treated compressed wood, heat-stabilized compressed wood, delignified wood
	W8.10 Wood Plastic Composites (WPC)			
W11 Wood for construction	Include new examples for ;W11.4 Dividers;			
	Level 1	Level 2	Level 3	Examples
W11 Wood for construction	W11.4 Dividers			E.g. Room Dividers, folding screens, and screens

W12 Indoor furniture	<p>Expand Level 3 for 'W12 Indoor furniture' by modifying 'W12.11 Kitchen countertops' and update it to "W12.11 kitchens", expand the product clarification to addressed to those who make complete or components of FSC certified kitchens.</p> <p>Update 'W12.13 Shelves' to 'W12.13 Bookcases & shelving units'.</p> <table border="1" data-bbox="343 376 1430 1193"> <thead> <tr> <th>Level 1</th> <th>Level 2</th> <th>Level 3</th> <th>Examples</th> </tr> </thead> <tbody> <tr> <td>W12 Indoor furniture</td> <td>W12.11 Kitchen countertops</td> <td>W12.12.1 drawers</td> <td></td> </tr> <tr> <td></td> <td></td> <td>W12.12.2 Furniture doors</td> <td></td> </tr> <tr> <td></td> <td></td> <td>W12.12.3 Kitchen shelves</td> <td></td> </tr> <tr> <td></td> <td></td> <td>W12.12.4 Furniture legs, frames and profiles</td> <td>E.g. Frames for sofas, legs for table and others lathe machined elements</td> </tr> <tr> <td></td> <td></td> <td>W12.12.5 Curved elements</td> <td></td> </tr> <tr> <td></td> <td></td> <td>W12.12.6 Kitchen countertops and worktops</td> <td></td> </tr> <tr> <td></td> <td></td> <td>W12.12.7 Others part of furniture</td> <td></td> </tr> <tr> <td>W12.13 Shelves Bookcases & shelving units</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Level 1	Level 2	Level 3	Examples	W12 Indoor furniture	W12.11 Kitchen countertops	W12.12.1 drawers				W12.12.2 Furniture doors				W12.12.3 Kitchen shelves				W12.12.4 Furniture legs, frames and profiles	E.g. Frames for sofas, legs for table and others lathe machined elements			W12.12.5 Curved elements				W12.12.6 Kitchen countertops and worktops				W12.12.7 Others part of furniture		W12.13 Shelves Bookcases & shelving units			
Level 1	Level 2	Level 3	Examples																																		
W12 Indoor furniture	W12.11 Kitchen countertops	W12.12.1 drawers																																			
		W12.12.2 Furniture doors																																			
		W12.12.3 Kitchen shelves																																			
		W12.12.4 Furniture legs, frames and profiles	E.g. Frames for sofas, legs for table and others lathe machined elements																																		
		W12.12.5 Curved elements																																			
		W12.12.6 Kitchen countertops and worktops																																			
		W12.12.7 Others part of furniture																																			
W12.13 Shelves Bookcases & shelving units																																					
W18 Other manufactured wood products	<p>Include examples for 'W18.9 Wheels'.</p> <table border="1" data-bbox="343 1317 1430 1503"> <thead> <tr> <th>Level 1</th> <th>Level 2</th> <th>Level 3</th> <th>Examples</th> </tr> </thead> <tbody> <tr> <td>W18 Other manufactured wood products</td> <td>W18.9 Wheels</td> <td></td> <td>E.g. Wagon wheels, ship/boat wheel</td> </tr> </tbody> </table>	Level 1	Level 2	Level 3	Examples	W18 Other manufactured wood products	W18.9 Wheels		E.g. Wagon wheels, ship/boat wheel																												
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PULP AND PAPER PRODUCTS																																					
P1 Pulp	<p>Introduce 'P1.3.1 Micro fibrillated cellulose' category for ' P1.3 Chemical pulp, bleached'. Remove 'P1.7.4 Rayon and other synthetic fibres', it will be moved to a new classification for textiles, 'PXX Textile and textile products'. Expand product categories and Level classification for Pulp and cellulose products.</p> <table border="1" data-bbox="343 1756 1430 1998"> <thead> <tr> <th>Level 1</th> <th>Level 2</th> <th>Level 3</th> <th>Examples</th> </tr> </thead> <tbody> <tr> <td>P1 Pulp</td> <td>P1.3 Chemical pulp, bleached</td> <td>P1.3.1 Micro fibrillated cellulose</td> <td></td> </tr> <tr> <td></td> <td>P1.7 Cellulose/ Dissolving pulp products</td> <td>P1.7.4 Rayon and other synthetic fibres</td> <td>E.g. Artificial silk, textile fibres, yarn, viscose</td> </tr> </tbody> </table>	Level 1	Level 2	Level 3	Examples	P1 Pulp	P1.3 Chemical pulp, bleached	P1.3.1 Micro fibrillated cellulose			P1.7 Cellulose/ Dissolving pulp products	P1.7.4 Rayon and other synthetic fibres	E.g. Artificial silk, textile fibres, yarn, viscose																								
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		PX.X Cellulose derivatives	P1.7.2 Cellulose derivatives													
			PX.X.X Cellulose ether	E.g. Methylcellulose (MC), Carboxymethylcellulose (CMC), Ethylcellulose (EC), Hydroxyethyl cellulose (HEC)												
			PX.X.X Cellulose mixed ether	E.g. Hydroxypropyl cellulose (HPC), Methylethylcellulose (MEC), Hydroxyethyl methyl cellulose (HEMC), Hydroxypropyl methylcellulose (HPMC) (Hypromellose), Ethyl hydroxyethyl cellulose, Carboxymethyl hydroxyethyl cellulose												
			PX.X.X Cellulose ester	E.g., Cellulose nitrates, Cellulose acetates, cellulose acetate propionate, cellulose propionate, cellulose acetate butyrate												
		PX.X Regenerated cellulose film		E.g., Cellophane (Cellulosehydrat)												
		PX.X Nanocellulose	PX.X.X Cellulose nanofibril (CNF)													
			PX.X.X Cellulose nanocrystal (CNC)													
			PX.X.X Bacterial cellulose (BC), electrospun cellulose nanofiber (ECNF)													
P2 Paper	<p>Include new Level 3 product categories for 'P2 Paper'.</p> <p>Consider providing more examples for 'P2.6 Tissue paper' or removing it from the product classification due to ambiguity issues.</p> <table border="1"> <thead> <tr> <th>Level 1</th> <th>Level 2</th> <th>Level 3</th> <th>Examples</th> </tr> </thead> <tbody> <tr> <td>P2 Paper</td> <td>P2.4 Specialty paper</td> <td>P2.4.13 Adhesive paper</td> <td></td> </tr> <tr> <td></td> <td>P2.6 Tissue paper</td> <td>P2.6.1 finished products made from</td> <td></td> </tr> </tbody> </table>				Level 1	Level 2	Level 3	Examples	P2 Paper	P2.4 Specialty paper	P2.4.13 Adhesive paper			P2.6 Tissue paper	P2.6.1 finished products made from	
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	P2.6 Tissue paper	P2.6.1 finished products made from														

			tissue paper	
P3 Paperboard	Introduce new Level 2 product category 'P3.7 Specialty paperboard' and examples.			
	Level 1	Level 2	Level 3	Examples
	P3 Paperboard	P3.7 Specialty paperboard		E.g. Honeycomb paperboard, paper plywood
P4 Corrugated paper and Paperboard	Introduce 'P4.44 Honeycomb paperboard', it is often used in furniture to lighten products.			
	Level 1	Level 2	Level 3	Examples
	P4 Corrugated paper and Paperboard	P4.4 Honeycomb paperboard		
P5 Packaging and wrappings of paper	Minor change to Level 1, added more clarifications and expanded Level 2 categories with examples.			
	Level 1	Level 2	Level 3	Examples
	P5 Packaging and wrappings of pulp and paper	P5.6 Egg boxes and similar Moulded pulp and moulded fibre materials		E.g. Egg boxes and similar
		P5.8 Tags and Other wrapping related products		
P9 Bobbins, spools, rolls and similar	Introduce new Level 2 product categories 'P9.1 semi-finished bobbins, spools, rolls and similar' and 'P9.2 printed and finished bobbins, spools, rolls and similar'.			
	Level 1	Level 2	Level 3	Examples
	P9 Bobbins, spools, rolls and similar	P9.1 semi- finished bobbins, spools, rolls and similar		
		P9.2 printed and finished bobbins, spools, rolls and similar		

<p>PXX Other manufactured pulp and paper products</p>	<p>Introduce a new Level 1 product classification category 'PXX Other manufactured pulp and paper products' to allow for the introduction of 'PX.X Cardboard coffins'.</p>																																															
<p>PXX Textile and textile products</p>	<p>Introduce new product type nomenclature for 'PXX Textile and textile products' and additional Level 2 and Level 3 textile and related product categories with examples.</p>																																															
	<p>Replace the term "synthetic" with "manmade" for raw fibres.</p>																																															
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<p>NON-TIMBER FOREST PRODUCTS (NTFPs)</p>																																																

N3 Cork and articles of cork	Introduce a new Level product category 'N3.8 Cork Plastic Composites (BPC)' and examples.			
	Level 1	Level 2	Level 3	Examples
	N3 Cork and articles of cork	N3.8 Cork Plastic Composites (BPC)		E.g. Cork-plastic composite (CPC)
N5 Bamboo and articles of bamboo	Bamboo categories are quite underdeveloped when it comes to disposables and household articles, added new Level 2 categories with examples.			
	Level 1	Level 2	Level 3	Examples
	N5 Bamboo and articles of bamboo	N5.11 Bamboo paper		
		N5.12 Bamboo cutlery and utensils	N5.12.1 Bamboo chopsticks	
	N5.11 Bamboo Plastic Composites (BPC)			
N7 Natural gums, resins, oils and derivatives	Revised this product classification type to 'N7 Natural forest/plant secretes' to focus on forest based secretes. Essential oils, processed and manufactured rubber and latex products are moved to 'C10 Further processed gums, resins or oils and derivatives'			
	Level 1	Level 2	Level 3	Examples
	N7 Natural forest/plant secretes gums, resins, oils and derivatives	N7.1 Rubber/Latex	N7.1.1 Natural rubber	
			N7.1.2 Tyres	
			N7.1.3 Balls	
			N7.1.4 Footwear	
			N7.1.5 Rubber foam pillows and mattresses	
		N7.1.6 Balata, gutta-percha, guayule, chicle		

			N7.1.7 Other manufactured articles	
	N7.3 Gum resin and manufactured resin products			E.g. Gum arabic, gum tragacanth, gamboge, frankincense, myrrh
	N7.4 Tannin			
	N7.5 Essential oils			
N8 Chemical, medicinal and cosmetic products	<p>Rename existing Level 1 and 2 categories to expand the product classification to allow for 'flavouring' and focus primarily on forest products harvested from the forest. Products such as wood vinegar, pyroligneous acid should be considered as processed chemical materials and are moved to 'C1 Chemical Raw Materials and Further Processed Products (CRRPS), C6 Wood vinegar/ Pyroligneous Acid'.</p> <p>Chemical, medical and cosmetic plant products are moved to 'C1 Chemical Raw Materials and Further Processed Products (CRRPS)'.</p> <p>'N8.1 Ethanol' is removed and moved to the new product classification 'C11 Alcohols/ Biofuels'.</p>			
	Level 1	Level 2	Level 3	Examples
	N8 Flavouring, chemical, medicinal and cosmetic plant products	N8.1 Ethanol		E.g. Xylitol
		N8.2 N8.1 Medicinal plants and forest products		
		N8.3 N8.2 Pharmaceutical forest raw materials		E.g. Salicylic acid, quinine, paclitaxel, betulinic acid, snakewood extract, neem
		N8.3 Cosmetics and health care forest products		
		N8.5 Wood vinegar		
		N8.4 Flavouring forest products		
		N8.6 Pyroligneous acid		

N9 Food	Include new Level 3 categories for N9 Food with examples.			
	Level 1	Level 2	Level 3	Examples
N9 Food		N9.2 Tea	N9.2.1 Processed tea	E.g. Erva-mate, mate
			N9.2.2 Unprocessed tea	
		N9.5 Fruits	N9.2.1 Processed fruits	E.g. dried fruit
			N9.2.2 Unprocessed fruits	
		N9.7 Game	N9.7.1 Live game	
			N9.7.2 Game meat	
C1 Chemical Raw Materials and Further Processed Products (CRRPS)	Introduce a new product classification group for chemical raw materials and chemically processed materials.			
	Level 1	Level 2	Level 3	Examples
	C1 Lignocellulose			E.g. Additives for the production of paper and cardboard boxes, Plastics, Adhesives such as construction adhesives, brake pads, Floor coverings
	C2 Hemicellulose and Derivates			E.g. Monosaccharides, Polysaccharides
	C1 Combustion, pyrolysis, charcoal products	C1.1 Ash		E.g. Fertilizer, spread for icy sidewalks
		C1.2 Charcoal	C1.2.1 Charcoal breeze	E.g. Barbecue charcoal, Active charcoal, Filter medium
			C1.2.2 Coconut charcoal (?)	
	C12 Lignin	C12.1 Binding agent products		E.g. Aromatic substances, Corrugated board, Refractory mixes, Pellets, Dust binding
		C12.2 Dispersing agent products		E.g. Grinding aid, Gypsum plasterboard, Brick, Textile dyes, Cilfield applications, Plant protection products,
		C12.3 Other Lignin products		E.g. Dimethylsulfide (DMS)/ Dimethylsulfoxide (DMSO), Vanillin, Carbon fibres

	C5 Combustion, pyrolysis, charcoal products	C5.1 Ash		E.g. Fertiliser, spread for icy sidewalks
		C5.2 Charcoal and manufactured products		E.g. Barbecue charcoal, Active charcoal, Filter medium
		C5.3 Smoke		E.g. Smoking agent, smoked products and produce (i.e. smoked salmon with FSC smoke)
		C5.4 Syngas/synthesis gas		
	C6 Wood vinegar/ Pyroligneous acid			E.g. Wood Vinegar, Acetic acid
	C7 Wood tar and processed products	C7.1 Crude Wood tar		E.g. Preservative or sealing agent
		C7.2 Creosote		E.g. Lures for hunting, Wood preservative, Pharmaceutical applications
		C7.3 Pitch		E.g. Waterproofing roofs, Electrodes, Plastics, Insulating materials and in, caulking seams, varnishes, paints, floor coverings
		C7.4 Oil/Pyrolysis oil		
	C8 Turpentine			E.g. Rosin/ Colophony, sealing wax and varnishes
	C9 Tall soap, tall oil and processed products	C9.1 Crude tall oil (CTO)	C9.1.1 Distilled tall oil (DTO)	
			C9.1.2 Tall oil rosin (TOR)	
			C9.1.3 Tall oil pitch (TOP)	
			C9.1.4 Tall oil heads (TOH)	

			C9.1.4 Tall oil fatty acid (TOFA)	
C10 Further processed gums, resins or oils and derivatives	C10.1 Further processed Rubber/ Latex products		C10.1.1 Natural rubber	
			C10.1.2 Tyres	
			C10.1.3 Balls	
			C10.1.4 Footwear	
			C10.1.5 Rubber foam pillows and mattresses	
			C6.1.6 Balata, gutta-percha, guayule, chicle	
			C10.1.7 Other manufactured articles of rubber	
	C10.2 Manufactured resin products			
	C10.3 Tannin and products			
	C10.4 Essential oils and products			E.g. Camphor, Brazil nut oil, Copaiba Oil
C11 Alcohols/ Biofuels	C2.1 Ethanol			E.g. Xylitol
	C2.2 Methanol			
	C2.3 Biodiesel			
C12 Platform chemicals				E.g. Furfural

	C13 Plastics (modified natural polymers)			
	C14 Chemicals or chemically further processed medical and cosmetic products	C14.1 Medicinal products		
		C14.2 Pharmaceutical raw materials		
		C14.3 Cosmetics and health care products		
		C14.4 Industrial use products		E.g. paints, dyes
	C15 Other chemical raw materials and further processed products n. e. c.			
* The n.e.c. abbreviation means that the category includes those products “not elsewhere classified”.				

VI. Annex B

Impact identified by stakeholders: *Are there any impacts that we have not identified? Please specify and elaborate on your response:*

Participants were asked to identify any impact that FSC might have missed. The following are some key points from responses given by 25 participants:

- Following the theme of responses, stakeholder reiterate that a major revision would have a large impact for both certificate holders and certification bodies, as this would require revisions to verification tools and data management system as well.
- Certificate holders at the end of the supply chain may not have been properly consulted in this risk analysis, and stakeholders expect FSC to have a more direct outreach to FSC certificate holders and others in the industry to really understand and determine which approach is best.
- The codes that FSC chooses needs to remain consistent with the industry common names to avoid confusion and dispute.
- It is suggested that we keep the existing product classification structure but expand it. FSC does not operate with other international standards for product classifications, so we will not recognize the value in aligning with another standard.
- Stakeholders identified that the current impact analysis does not show explicit links to FSC International 2021-2026 Global Strategy.

Comments on Annex A: *Do you have any comments on Annex A (A, B, C & D), FSC-STD-40-004a? Please provide specific references to the information in the “Item to be revised” column.*

24 participants gave comments on Annex A and gave detailed information in the “**Item to be revised**” column. Some of the key themes emerging from the responses are mentioned below:

- There are two common products that have been overlooked: Firewood and seed. Firewood may be rough wood or wood in particles if split. There seems to be the need to use either "laminated" or "melamine" which presumably means the same.
- Seed as food and seed for propagation needs to be identified under NTFP.
- It is unclear how a product can be certified if the product classification is not listed - how can it be determined that it is within the scope of the certificate.
- A stakeholder finds different levels for P1 unnecessary.
- Suggested P5.6 "Molded pulp and molded fiber materials" could also state bottles under “examples” category. To date, there is no direct option for bottles where the cover made from paper material is used for cleaning, cosmetic products, etc. There is only P5.5 for liquid food, but, again, one is needed for other bottles with liquid content other than for food.
- One stakeholder recommends changing the language to applying level 2 and 3 for product classifications to make the classification at level 2 and 3, compulsory.

- One stakeholder suggests aligning product group definitions, product type, product classification in the normative framework. There are conceptual differences.
- For Annex D Terms and reference, the suggested **definitions for P2.6 and 6.2** is leading to more confusion, the stakeholder suggest that P2.6 should be removed and product groups using this category should be moved to P6.2.
- A stakeholder suggests that to reduce the impacts and avoid misunderstandings during the transition period, existing codes that would be moved or removed (for example W2, currently wood charcoal) should be let unused or be allocated to brand new product types. Since moving every code would lead to a huge unnecessary workload.

Wood products: Do you have any comments on Annex A (Wood Products) FSC-STD-40-004a? Please provide specific references to the information in the “Item to be revised” column.

We asked participants to provide comments on Annex A (Wood Products), FSC-STD-40-004a, 29 responses were received. The following are key suggestions listed from the responses:

W1 Rough wood:

- A stakeholder emphasizes the importance in clarifying the classification of logs, which may be dependent on the usage. For example, downgraded sawlogs should be acceptable to classify as pulpwood if they are to be used as such by a pulp mill and suggests an upgrade to W1 Rough Wood - about the differentiation between Sawlogs and Pulpwood.
- Stakeholder highlights the need for a definition for Fuel Wood in the new draft version.

W2 Wood Charcoal:

- With regards to W2, a stakeholder shares their preference to keep W2 for Charcoal, and not to move this to C1.2.

W3 Wood in chips or particles:

- A stakeholder suggests that category W3 shall not be renamed W2, W2 shall remain unused and stated as empty in the table to avoid any confusions or be allocated to a brand-new level 1 category.
- A participant requests clarity on “W3.8 Wood fiber fleece” and asks how this category is different from “W3.4 Wood wool”?

W4 Impregnated/treated wood:

- A stakeholder provides detailed response with several examples to highlight a confusion created by W4.3 - impregnated wood category. Since W4 is not based on a physical change in the form of the material or a change in the application of the product, but the material has only been chemically treated to prolong the durability of wood in adverse environments. Therefore, this treatment almost never changes the type of use of the product. Example 1: A company buys sawn timber W5.4 and produces planed sawn timber W6.3 and decking W13.5. While not impregnated, they are separate products W6.3 and 13.5. As soon as company starts to impregnate any of these materials it turns out that they should be counted in one category W4.3, which the stakeholders find confusing.

W5 Solid wood (sawn, chipped, sliced or peeled):

- It is suggested by a stakeholder that category of sawn timber is confusing. A company could use any of these → W5.2, W5.3, W5.4., to categorize it, but it is not clear which one should be used. The confusion is further elaborated by an example:

W5.4 is a “plank”. What are the dimensions for this? When does the “plank” turn into a beam (W5.3)? And when will the “plank” go under the name “batten”? And why is it necessary to separate the “beams” (large dimension material), but not the “battens” (small dimension material)? Beams, planks, and battens are the same sawn timber, which are produced simultaneously from the same log and with the same equipment. Only dimensions of material that is sawed out of the same log is changing. It is further suggested by the stakeholder that only one product group is needed for sawn timber. A stakeholder underscores the need to clarify the logic behind nominating “brushes” based on their functionality, the categories should clarify if the brush is used for painting/working or for kitchen/baking.

W12 Indoor furniture:

- In order to enable a fully certified kitchen, a stakeholder suggests having sub-levels of W12.11: W12.11.1 carcass structure, W12.11.2 Base and tall units, W12.11.3 Wall Units, Q12.11.4 Kitchen countertops and worktops. The stakeholder further suggests that W12.12.3 should be renamed as “shelves”, as this change could be helpful for product group “fruit and vegetables wood boxes”. Similarly, another stakeholder however sees no point in having long lists of kitchen items categorized and suggests that change “Kitchen countertops” is changed to “parts for Kitchen series” to cover many items.

W16 Household articles:

- A stakeholder suggests some changes to W16 - Household articles, by adding W16.11 - Household articles products and removing W19 - Other wood products

W8 Wood panels:

- A stakeholder requires more clarity with regards to categories for chipboard and fiberboard, another stakeholder suggest adding ‘Melamine Fiberboard’ under W8.3 Fiberboard.

W9 Engineered wood products:

- A participant is of the opinion that the new category “W9.9 Treated/compressed/delignified wood/fibers” is not necessary, since these product types are already existing in the current “W4 Impregnated/treated wood”, “W9.10 Compressed wood” and “W9.11 Wood-plastic composites”. In this regard, the stakeholder proposes an approach for future developments: The existing Level 2 “W9.6 Glued laminated timber (GLULAM)” could be renamed “W9.6 Mass Timber Construction (MTC)”, and Level 3 MTC could be added: W9.6 Mass Timber Construction (MTC), W9.6.1 Glue-laminated timber (glulam), W9.6.2 CLT (Cross Laminated Timber), W9.6.3 Nail-laminated timber (NLT or nail-lam), W9.6.4 Dowel-laminated timber (DLT), W9.6.5 Other MTC.

W17 Stationery of wood

- Add Wooden pen drive (W17)

Others not classified:

- Add Luminaire
- Add Coal briquettes

Pulp and Paper Products: *Do you have any comments on Annex A (Pulp and Paper Products) FSC-STD-40-004a? Please provide specific references to the information in the “Item to be revised” column.*

P1 Pulp:

- A participant highlights that “P1 Pulp”, Micro fibrillated cellulose (MFC) can be made from chemical or mechanical pulp and it is more a chemical specialty than a type of chemical pulp, it should not be a level 3 of chemical pulp.
- A stakeholder raises doubts and questions on certain categories of fiber: a) “PX.X.X Bacterial cellulose (BC), electro spun cellulose nanofiber (ECNF)” cannot be an FSC-certified product, because bacterial cellulose is cellulose made from bacteria, not from trees or forest-based materials. Electrospinning is a method to form fibers, it’s not a category of nanocellulose.

P2 Paper:

- “P2.6 Tissue paper” shall be removed, and only “P6.2 Facial tissues and refreshing tissues” should be used.
- P2 Paper, consider the differences and similarity of “P2.4.13 Adhesive paper”, “P7.7 Gummed paper” and “P7.8 Adhesive labels”

P3 Paperboard:

- On P3 Paperboard, a stakeholder proposed to introduce a new Level 2 category “P3.7 Specialty paperboard” that have “honeycomb paperboard” as an example, and to add another Level 2 category “P4.4 Honeycomb paperboard”. One of these two shall not be added to avoid any misunderstanding.
- A stakeholder highlights that Paperboard and Honey-Comb paperboard are in P3.7 and an in P4.4, leading to confusion

P5 Packaging and wrappings of paper:

- A stakeholder requests examples for the new “P5.8 Tags and other wrapping related” category: “E.g., Clothing paper tags”? Are tags made from textile on clothing in this category?

P7 Stationery of paper (printed and unprinted):

- A stakeholder suggests reducing P7 and P8 on the general Level 1 “Printing Products” as it has no additional value to split printing items.

P9 Bobbins, spools, rolls and similar:

- A stakeholder asks: What would be products in the new “P9.2 Printed and finished bobbins, spools, rolls and similar”? Wouldn’t a printed and finished bobbin preferably be categorized under its paper type? For example, a printed and finished bobbin of thermographic paper (for receipts) will be in the category P2.4.3.

PXX Textile and textile products:

- Due to the growth of FSC in the textile sector, FSC has added in 2020 and 2021 some new labels into the Label Generator online system. These new labels fit under 'Textiles' and are as follows: Modal, Cellulose Acetate and Lyocell. The stakeholder asks if it is possible to see them separately identified at level 2 or 3.
- A stakeholder had commented that “Lyocell”, and “Viscose” are different products by definition. Please see in FSC Trademark Portal that lists “Viscose” and “Lyocell” as type for the label.
- Viscose, modal and lyocell are types of Rayon. Tencel is a registered brand.
- A stakeholder suggests that Level 2 should follow the industrial process of the textile industries: 1-Fiber, 2-Yarn, 3-Fabric, 4-Textile product. The whole classification of textile should be prepared with a specialist to avoid mistakes, and textile and textile products should be placed in the new “Chemical products” category.
- A stakeholder suggests that the category need a category for finished apparel and not only the components.

PXX Other manufactured pulp and paper products:

- As for PXX level 1 “other manufactured pulp and paper products”, A stakeholder asks about the possibility of adding this category “Bio-composites” or “Pulp reinforced plastic composites” at level 2.
- A stakeholder asks if it would be more consistent to rename P7 as “P7 Stationery of paper (printed and unprinted) and manufactured pulp and paper products” and add a Level 2 “P7.11 Cardboard coffins”

New products or reclassification:

- Would be good to have a product group "adhesive tape" - given the new meaning of P.2.6 I think a product group "Wrapping tissue" should be added.
- Paper scrap (not P10) to be reclassified as recovered cellulose fiber.
- P6.7, add paper straws, face masks, diplomas, and certificates as examples, invitations, greeting cards, forms, medical prescription, letterhead, (as examples).
- Suggested that a new Level 1 (for example “C1. Cellulosic derivatives”) seems far more appropriate to categorize all cellulose-based materials and products. The classification in “Chemical products” seems much more logical than “Pulp and paper products”, since applications goes far beyond the pulping sector, and include textile, bioplastic, biofuels, biomaterials supply chains and products.
- The term “Mix” or “mixed” should not be used in our classification to describe products, due to the risk of confusion with FSC MIX claims.

- Add a classification for recycled viscose or the process of dissolving existing viscose into liquid form again. The technology is already out there and will no doubt be a major FSC market shortly when major FSC key accounts commercializes it.

NTFPs: Do you have any comments on Annex A (NTFPs), FSC-STD-40-004a? Please provide specific references to the information in the “Item to be revised” column.

N3 Cork and articles of cork

- N3 Cork and articles of cork, a participant complains that the example given for the new “N3.8 Cork Plastic Composites (CPC)” is not enlightening and requests a more precise example should be added.
- Add cork-based products.

N5 Bamboo and articles of bamboo:

- Add N5.12 Other bamboo products
- Add N5.X bamboo veneer. There are several CHs currently provide bamboo veneer and cannot find an exact code.
- The participant suggests treating the development of new bamboo categories as identical to the use of solid wood, paper and chemistry. Almost every product made from wood can be made from bamboo, and we will eventually need to have almost all the categories for Wood, Pulp and paper, Chemical/Textile products duplicated with bamboo. The participants further suggests that Bamboo should not be considered as an NTFP, but as “wood” and be declared in FSC product groups through the list do species.

N7 Natural gums, resins, oils, and derivatives:

- N7.2 include resin as an example - charcoal from non-wood forest products (babassu)
- A participant comments that the new Level 1 “N7 Natural Forest/plant secretes” now has only one Level 2 “N7.3 Gum resin”. Crude extracts should stay in the N7 category and not be moved to the new “C10” category.
-

N8 Chemical, medicinal, and cosmetic products:

- N8.2 and N8.1, add "E.g., conifer needles for inhalation".
- “N8.2 Medicinal Forest products” will need examples to be distinguished from “N8.3 Pharmaceutical Forest raw materials”. Molecules and extracted cited as examples for the pharmaceutical forest raw materials are not raw materials but obtain after extraction and purification. Thus, becoming chemicals more than raw materials.
- The difference between medicinal and pharmaceutical products and materials is not clear without examples.

N9 Food:

- Add N9.9 Other food - E.g., Coconut milk
- Add flavouring products
- Add timber-based sweeteners (Xylose and Xylitol)
- Confusion on different subcategories for processed or Unprocessed tea and fruit.

C1 Chemical Raw Materials and Further Processed Products (CRRPS):

- C1.2 Charcoal, a participant suggests adding:
 - a) C1.2.1 - Charcoal breeze (for lighting a fire) - E.g., Barbecue charcoal.
 - b) C1.2.2 - Charcoal breeze (other use) - E.g., Active charcoal.
 - c) Remove C1.2.2 - Coconut charcoal add C1.2.3 - Other types and purpose.
- The difference between the second C1 and C5 is not clear as some products seem to be the same.
- The inclusion of coconut charcoal is unclear. For example, where would coconut grown for fibers used to make furniture be classified in 40-004a?
- A participant comments that the whole 'C Chemical Raw Materials and Further Processed Products (CRRPS)' need to be reviewed and checked with specialists
- C1 Lignocellulose is not a category of product, it's a biomaterial made of cellulose, hemicelluloses, and lignin, such as wood, bamboo, agricultural crops. The provided examples do not correspond to "lignocellulose" products.
- C2 Hemicellulose and derivatives, a participant comments that this category is not precise enough to be used. Monosaccharides and polysaccharides can come from hemicellulose but also from cellulose or secondary metabolites in wood. - Xylitol, given as an example of Ethanol is not right (xylitol is not ethanol). - Structuration of the chemicals is not clear, chemical could be classed by chemical family or another way.
- There is a risk of confusion between the proposed C14 and N8.2 + N8.3.
- On C11, a participant comments that Alcohols/Biofuels can also be merged with C12 Platform chemicals (and platform chemical can be completed with furans, organic acids, alcohols)

New or reclassified products suggestions:

- Add green energy such as bio-methanol as a product
- Add Linoleum.
- On confusion between different categories: -
 - a) Why is charcoal categorized in the NRFP section?
 - b) Why is rubber/latex moved from N7?
 - c) N9 Food - What does "N9.7.1 Live game" represent as FSC products?

'Other items': Are there any other items you can think of that should be included in Annex A? Please provide specific information on what sections or clauses should be included and why they should be included.

Participants were asked to suggest items which should be included in Annex A. Some of the key responses are listed below:

- Suggestions to add new codes:

- a) paper drinking straws to P6.7
- b) add trade classification codes in parallel in the table of product groups.
- c) Add seeds.
- d) Printed non glued
- e) Biomass
- f) green energy such as bio-methanol as a product
- Add an infographic with connections within FSC International: CoC Program, market development, FSC strategic plan, channels for public information (FSC database, etc.) and how this standard contributes to all of this.

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New product classification: Are there any new product classifications that we need to add?

We ask participants to suggest new product classifications that FSC need to add to the standard. Some of the following responses are below.

Suggestion on new products to consider adding in the V3 of FSC-STD-40-004a:

- Cardboard toys
- Wood wool igniters
- Pastry brushes as W16.11
- Stationary under P7 if you want not to simplify/summarize "printing products" under one Level
- Add new product/service category for "E" - ecosystem services - beehives locations (for honey production or for pollination next to agricultural sites), fishing locations, Forest Therapy locations (<https://www.natureandforesttherapy.earth/about/the-practice-of-forest-therapy>), hiking trails (recreational and/or professional), climbing locations (natural or artificial), location for hunt with a camera, under FSC-STD-01-001 V5-0 FSC Principles and Criteria for Forest Stewardship defines ecosystem

services as: ... d. cultural services and cultural values such as recreational, spiritual, religious and other non-material benefits.

- For W5, add request to add cuttings (in German "Kappholz")
- W8 specifically identifies MDF under particle board, add raw particleboard e.g., 8.2.X - Raw particleboard. If W8.3.5 Veneered fiberboard (MDF) is added, it also shall be added W8.3.5 Melamine fibreboard (MDF) In W9.5 Solid-wood board maybe add the
- W9.5 Solid-wood board - glued. This is because the current name is almost the same as W5.2 which often leads to confusion.
- paper shavings / scrap paper - recovered cellulose fiber.
- W17, add wooden pen drive.
- Wooden lamp (as examples)
- Coal briquettes
- Charcoal from non-wood forest products (babassu)
- Wooden crafts
- Paper face mask (COVID-19)
- N72, resin

Other changes: *What are other changes that would be required in the FSC-STD-40-004a to make it more useful/up-to-date?*

We ask participants to recommend any other changes to make FSC-STD-40-004a more useful and up to date, and following points cover key suggestions shared by the participants.

- i. Participants require clarity about semi-finished vs. finished product and a more consistent classification in terms of what products are made of or what they are used for.
- ii. A stakeholder recommends adding an appendix for compliance of FSC product groups with customs product codes.
- iii. A complete revamping of the FSC database to be a more useful searchable database of FSC products.
- iv. Additional guidance to ensure classifications are correctly interpreted. Mechanism for a systematic approach to updating the product classifications.
- v. Set public consultation annually to have a test for the code and update annually. The industry grows quickly, new techniques, new products come out frequently.
- vi. Translate to Mandarin, and Spanish so that COC Certificate holders can find accurate product codes.
- vii. We suggest consideration of additional product types for the FSC label that would align with these changes, rather than just the options of paper or board.
- viii. Make it digital and technological.
- ix. Inclusion of more examples for each product classification and more frequent updates (which can be done in interpretative notes or advice notes, for example),
- x. The product classification needs to reflect much more industry terminology and language.
- xi. It would be great if we had a possibility to add information on the product group level on whether a product is recycled or virgin in origin.