



FSC's Response the EU Public Consultation on the Sustainable Products Initiative

The Forest Stewardship Council (FSC), the pioneer of forest certification with nearly 50 million hectares of certified forests in Europe, strives to support the Commission in making products more sustainable and fit for a climate-neutral circular economy. Below our recommendations:

1. Design for sustainability: including responsible sourcing of materials among the EU product 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 (1). Responsible sourcing is therefore the **precondition for an effective sustainable circular economy** (2) because it helps eliminating sustainability risks in the supply chain by considering social and environmental aspects already at the sourcing level (3).

2. Co-design for sustainability: employing robust voluntary sustainability standards as proxy for compliance with product sustainability principles

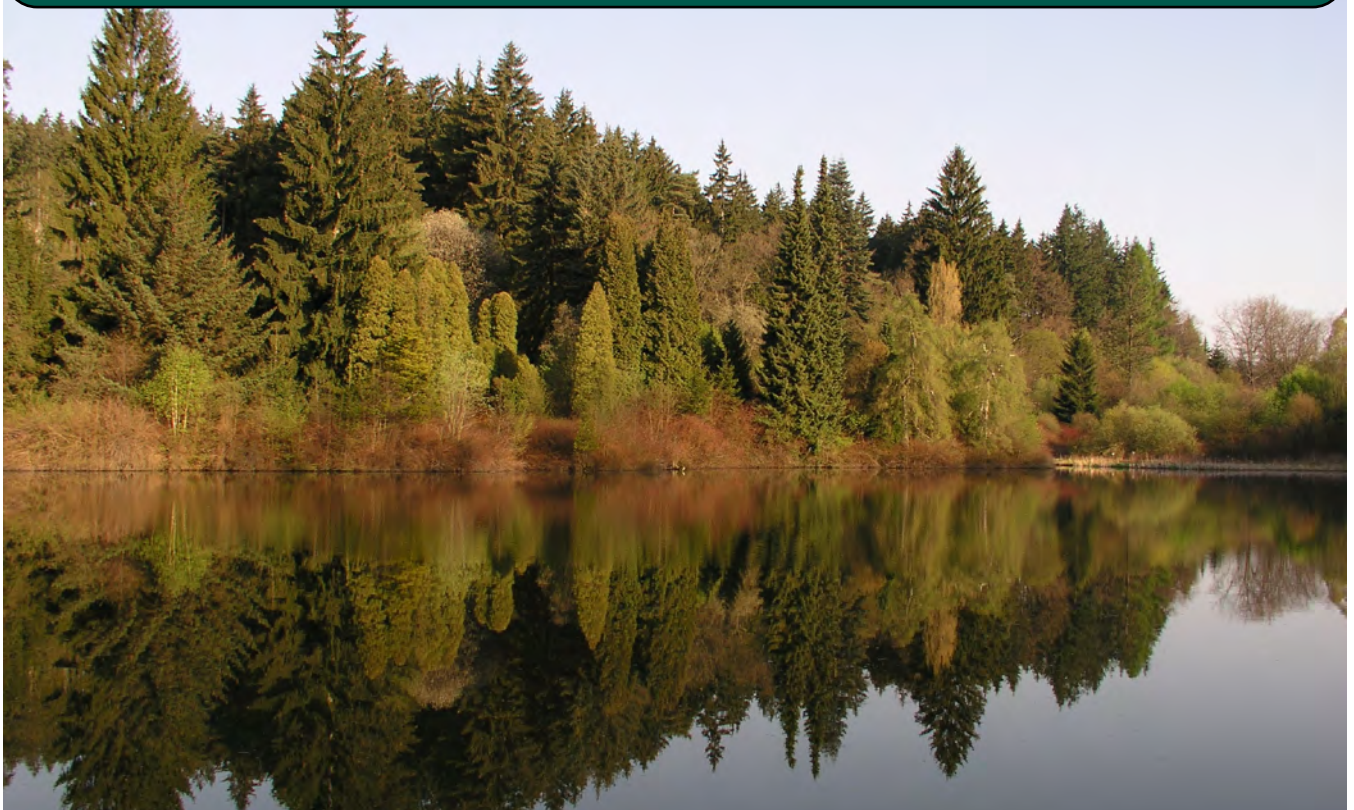
One way to foster responsible sourcing is employing voluntary sustainability standards (VSS) embedding both **environmental and social** criteria. For instance, FSC certification ensures that forest-based products come from responsibly-managed forests respecting **environmental, social and economic norms** – hence, in line with the EU Green Deal (4). These approaches can effectively **complement** legislative measures by nudging companies in making responsible commitments with climate-friendly targets (5). This ensures that **sustainability is present already at the sourcing level in the supply chain**. Hence, FSC recommends the EU Commission to employ robust VSS as a proxy to verify the EU product sustainability principles, as per option already adopted under EUTR, among others (6).

3. Boosting sustainability: raising the bar for voluntary sustainability standards

While there are many standards on the market – some are more credible than others. This is because credible standards respect principles and have fundamental qualities which ensure they achieve positive environmental and social impacts. On this, ISEAL is the global membership organization for ambitious and transparent sustainability systems (7), which provides a recognised framework defining practices for effective and credible sustainability systems (8). FSC thus encourages the EU Commission to set strict sustainability criteria for VSS as the basis to employ them as a proxy to help Member States verifying the EU product sustainability principles. Examples of strict requirements for VSS are set out in the annex below (9)

About FSC

As the pioneer of forest certification, 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](#).



References

- (1) Ellen MacArthur Foundation, Completing the Picture: How the Circular Economy Tackles Climate Change (2019), available [here](#).
- (2) UN Environment Programme and the UN Industrial Development Organization (UNIDO), Climate Technology Centre and Network, Carbon sink and low-carbon building materials, available [here](#).
- (3) See footnote number 1.
- (4) See the EU Commission communication on [The European Green Deal](#), as well as the [EU Commission communication on the EU Biodiversity Strategy for 2030 Bringing nature back into our lives](#)
- (5) Kerstin Weber, Jenny Walther-Thoß, Martina Fleckenstein, Deforestation-free supply chains: Concepts and implications, 2016, WWF Deutschland, available [here](#).
- (6) Regulation (EU) No 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market, available [here](#).
- (7) See ISEAL credibility principles [here](#).
- (8) See ISEAL code of good practice [here](#).
- (9) This is also in line with choices adopted at national level. See for instance the French Strategy to fight deforestation, available [here](#).

Annex – example of strict requirements for voluntary sustainability standards

• Environmental requirements

- o Explicit mention of high conservation values (HCVs)
- o Preservation of peatlands
- o Fight against conversion of natural ecosystems
- o Respect of the legal status of land

• Social requirements

- o Protection of Indigenous Peoples' rights
- o Complying with local labour laws and the regulations and standards of the International Labour Organization (ILO)

• Credibility requirements and assurances

- o Multi-stakeholder platform with representation of civil society
- o Third party auditing
- o Dispute resolution systems