



Report

# PRACTICAL IMPLEMENTATION OF THE FSC FOREST STEWARDSHIP STANDARD FOR UKRAINE DURING 30/03/2020 TO 01/09/2025

Prepared by FSC Ukraine

23/12/2025



**Title:** Practical Implementation of the FSC Forest Stewardship Standard for Ukraine during 30/03/2020 to 01/09/2025

**Approval by:** Working Group on the development and implementation of national forest certification standards for Ukraine on 26/09/2025

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# Prerequisites for adopting a decision to revise the FSC Standard for Ukraine

The objective of this Report is to analyse the practical implementation of the FSC Forest Stewardship Standard for Ukraine (hereinafter referred to as the FSC Standard for Ukraine) during the period from 30/03/2020 to 01/09/2025.

The necessity of such an analysis is determined by paragraph 12.3 FSC-STD-60-006 V 1-2 “Process requirements for the development and maintenance of National Forest Stewardship Standards”, according to which, a review report of all the comments on the standard, changes to associated elements of the FSC system; as well as external circumstances and the continued relevance of the standard shall be compiled within 3 years of the standard’s approval.

Currently, according to ADV-STD-60-006\_05 (<https://connect.fsc.org/document-centre/documents/resource/2101>), regular and extraordinary revisions of FSS based on FSC principles and criteria V 5 have been minimised in view of the current FSC priorities for the period from 2025 to 2027. At the same time, the 5-year validity period of FSS based on FSC principles and criteria version 5 has been extended until their revision, replacement or cancellation. Thus, this report should be viewed as:

- the basis for the decision by the Working Group on the development and implementation of national forest certification standards for Ukraine (hereinafter referred to as the Working Group) on the advisability or inadvisability of initiating a revision of the FSC Standard for Ukraine, taking into account the current priorities of the FSC;
- a guideline for shaping areas of support for the practical implementation of the FSC Standard for Ukraine by FSC Ukraine and other stakeholders in terms of information, methodology, training and other components.

The FSC Standard for Ukraine has been developed based on FSC Principles and Criteria V 5-2 and the International Generic Indicators V 1-0.

V 1-0 FSC-STD-UKR-01-2019 came into effect on 30 March 2020 and replaced the temporary standards of certification bodies for assessing forest management systems in Ukraine. The transition period to V 1-0 FSC-STD-UKR-01-2019 ended on 29 September 2021 (taking into account its extension due to the Covid-19 pandemic).

V 1-1 FSC-STD-UKR-01.1-2024 came into effect on 23 September 2024, replacing V 1-0 FSC-STD-UKR-01-2019. Completion of the transition period to V 1-1 FSC-STD-UKR-01.1-2024 – 22 September 2025.

The process of developing V 1-1 of the FSC Standard for Ukraine was not an official revision process as required by FSC-STD-60-006 V 1-2. This process was initiated with the aim of developing FSC criteria, indicators and verifiers for excision of areas contaminated with explosive objects from the scope of certification in accordance with FSC-POL-20-003 V 1-0 for Ukraine and reflecting them as an annex to the Standard. The start date of the current FSC Standard for Ukraine review/ revision cycle remains 30 March 2020.

This report presents the results of an analysis of the practical implementation of the FSC Standard for Ukraine, covering versions 1-0 and 1-1 without distinguishing between them.

The distinctive features of the FSC Standard for Ukraine that should be highlighted in the analysis of its practical implementation are as follows:

- applicability of the Standard to all types of forestry activities related to FSC certification in Ukraine, all types of forests, products and services, including non-timber forest products and ecosystem services (with regard to ecosystem services, it is necessary to comply with FSC-PRO-30-006);

– inclusion in the Standard of systemic, process-based and adaptive approaches to management at both the indicator and verifier levels, developed on the initiative of the Working Group; implementation of the SIR concept in accordance with FSC-GUI-60-002 ensured the risk orientation of the Standard as a prerequisite for a precautionary approach in the implementation of its requirements regarding environmental values and other elements.

Currently, the Standard is applied in Ukraine by forest users of various forms of ownership and subordination. State ownership of forests prevails in Ukraine; municipal forests account for about 17% of their total area, and private forests account for less than 1%. The largest share of forests is managed by the State Forest Resources Agency of Ukraine (7.6 million hectares or 73%).

Information, training and methodological support are important for the practical implementation of the FSC Standard in Ukraine. In particular, the methodological framework developed at the request of FSC Ukraine consists of:

1. Guide to the Practical Implementation of the FSC® National Forest Stewardship Standard for Ukraine / Bondaruk G. V. et al.; edited by P. V. Kravets. 2021. 172 p. URL: <https://ua.fsc.org/ua-uk/forest-management-certification>.

2. Pavlishchuk O. P., Storchous O. V. Forest Certification According to FSC® National Standard for Ukraine: Opportunities for Stakeholders: Practical Guide. 2021. 48 p. URL: <https://ua.fsc.org/ua-uk/forest-management-certification>.

FSC Ukraine regularly organises training courses and workshops on the practical implementation of the FSC Standard for Ukraine involving relevant experts, for example (see the comprehensive list of training courses at <https://ua.fsc.org/ua-uk/newsfeed>):

✓ “How FSC Training Changes Approaches to Preserving the Value of Forests in Ukraine” – <https://ua.fsc.org/ua-en/newsfeed/how-fsc-training-changes-approaches-to-preserving-the-value-of-forests-in-ukraine>;

✓ “Best Practices in Environmental Values for FSC Training Participants” – <https://ua.fsc.org/ua-en/newsfeed/best-practices-in-environmental-values-for-fsc-training-participants>;

✓ “Strengthening the Capacity to Implement FSC Values by Engaging Stakeholders” – <https://ua.fsc.org/ua-en/newsfeed/strengthening-the-capacity-to-implement-fsc-values-by-engaging-stakeholders>;

✓ “Maintain Representative Sample Areas of Native Ecosystems” – <https://ua.fsc.org/ua-en/newsfeed/maintain-representative-sample-areas-of-native-ecosystems>;

✓ “Environmental Values in FSC Management System of Certificate Holders” – <https://ua.fsc.org/ua-en/newsfeed/environmental-values-in-fsc-management-system-of-certificate-holders>;

✓ “Social Responsibility in National Forest Stewardship Standard for Ukraine: Gender Equality and Elimination of Discrimination” – <https://ua.fsc.org/ua-en/newsfeed/social-responsibility-in-national-forest-stewardship-standard-for-ukraine-gender-equality>.

The presented analysis of the practical implementation of the FSC Standard for Ukraine is based on the results of:

- a stakeholder survey on the experience of implementing the FSC Standard for Ukraine;
- analysis of public reports by certification bodies on the assessment of forest stewardship conformity with the FSC Standard for Ukraine;
- analysis of changes in the operating environment of forestry organizations (in particular: changes in the FSC regulatory framework; changes resulting from armed aggression against Ukraine; changes in the forest industry management system in Ukraine).

The above provides grounds for making a conclusion regarding the further relevance of the FSC Standard for Ukraine and the advisability or inadvisability of its revision.

# Analysis of the results of a stakeholder survey on the experience of implementing the FSC Standard for Ukraine

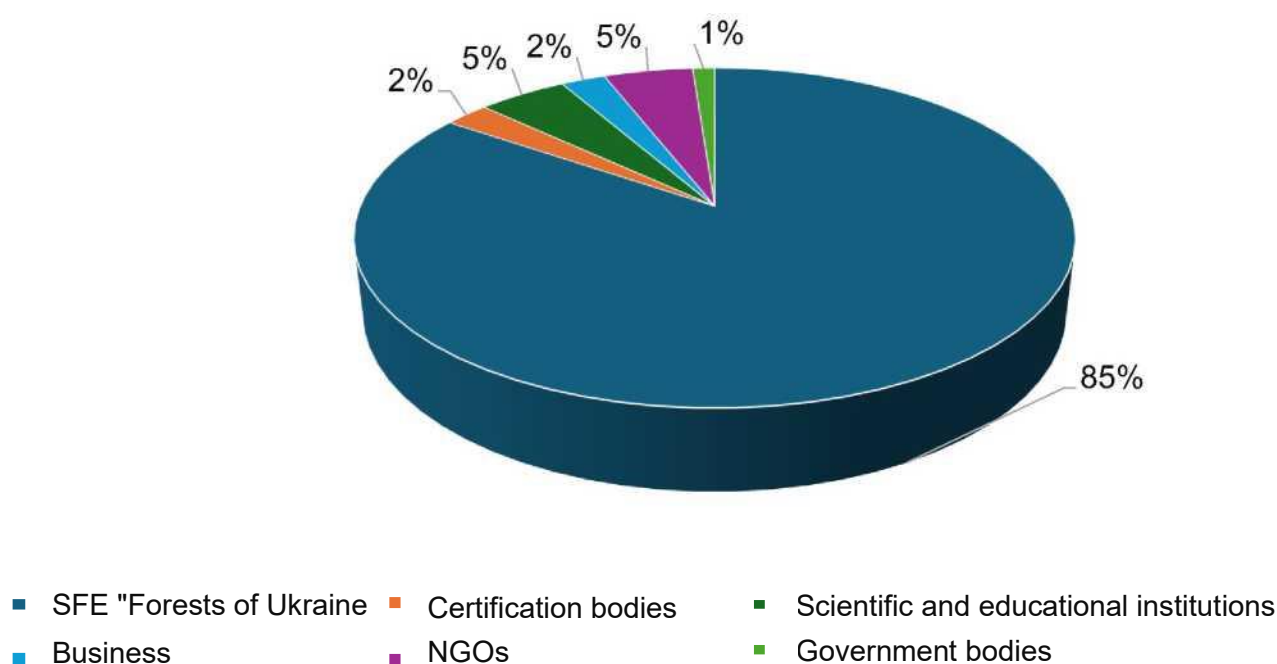
**Objective of the survey:** analysis of the experience of practical implementation of the FSC Standard for Ukraine and its impact on the level of forest management in the country.

**Potential respondents:** FSC certificate holders, representatives of non-governmental organizations, educational and scientific institutions, government bodies, certification bodies and other parties involved in ensuring responsible forest management.

**Survey period:** from 19/12/2024 to 13/01/2025

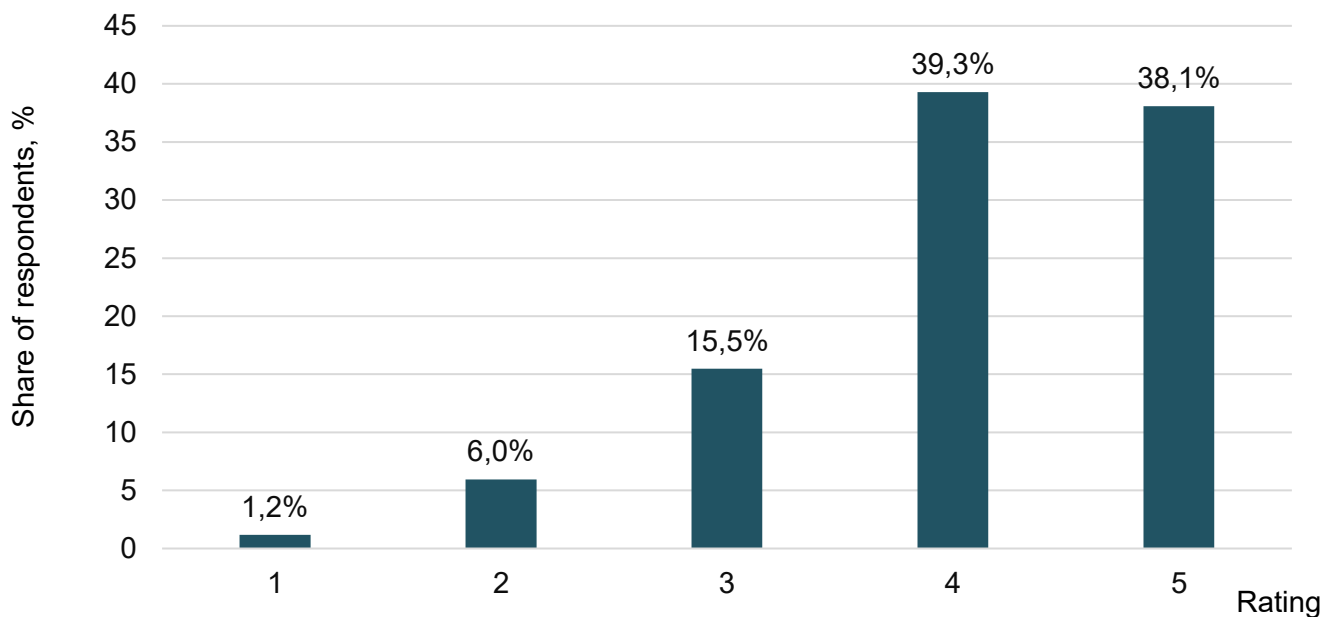
**Survey method:** 17 questions of various types in Google Forms (closed single- or multiple-choice questions with the option to suggest your own answer; rating questions using a scale; open-ended questions).

**Number of participant respondents:** 84. Most respondents (85%) represent the SFE "Forests of Ukraine" (primarily FSC certificate holders (CHs) at the level of structural units of the SFE). In this category, the survey participants were mainly management and engineering personnel. The representation of respondents by organization is shown in **Fig. 1**.



**Fig. 1. Distribution of respondents by affiliation with the organizations they represent**

The impact of the practical implementation of the FSC Standard for Ukraine since 2019 on improving forest management in Ukraine was rated quite highly by over 77% of respondents (**Fig. 2**). According to the proposed scale (rating '1' – virtually no impact, rating '5' – significant impact), most respondents rated the impact of the FSC Standard for Ukraine on improving forest management in Ukraine as '4' and '5' (**Fig. 2**).

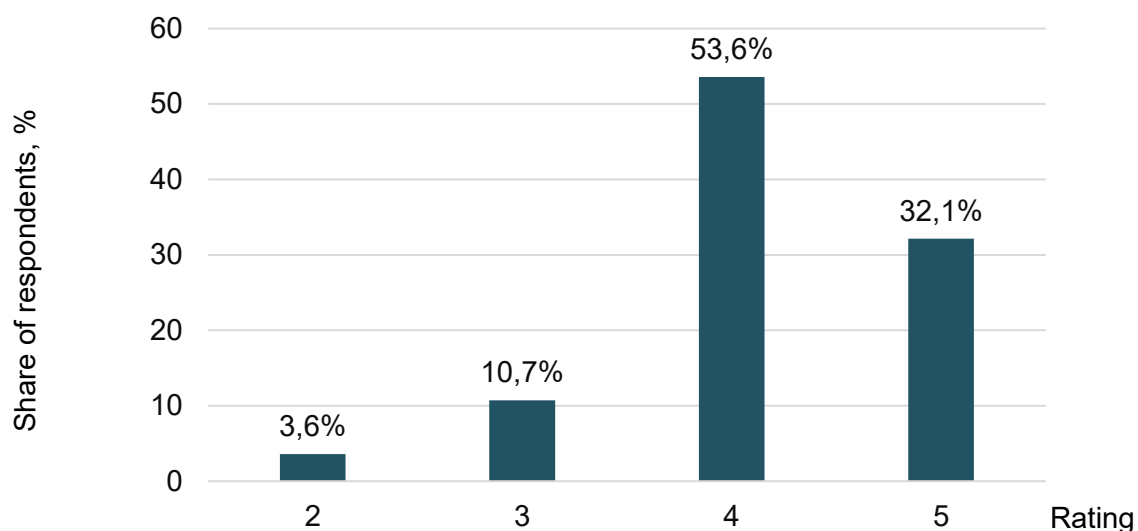


**Fig. 2. Assessment of the impact of the practical implementation of the FSC Standard for Ukraine since 2019 on improving forest management in Ukraine (rating ‘1’ – virtually no impact, rating ‘5’ – significant impact)**

It should be noted that the assessment of the impact of the practical implementation of the FSC Standard for Ukraine since 2019 on improving forest management in Ukraine by representatives of non-governmental organizations ranges from a rating of ‘2’ (1 respondent) to ratings ‘4’ (2 respondents) and ‘5’ (1 respondent). The assessment by representatives of scientific and educational institutions also varies, ranging from ‘2’ (1 respondent) and ‘3’ (1 respondent) to ‘4’ (2 respondents). Representatives of certification bodies are unanimous in their assessment of the impact of the practical application of the Standard, which they have rated as ‘4’. A representative of the government agency rated the impact of the practical implementation of the FSC Standard for Ukraine since 2019 on improving forest management in Ukraine as ‘5’.

From the list of standard elements proposed in the survey, in terms of which forest management has improved (Annex A), respondents most frequently noted those relating to *maintain, protection and conservation of environmental values and prevention of negative impact on them by economic activities* (80.3% and 69.7% of respondents, respectively). A significant proportion of respondents noted improvements in forest management in terms of the *application of responsible forestry practices in forest regeneration, protection, conservation, logging* (47.4%) and *ensuring sustainable use of forests* (63.2%). Respondents also pointed out the impact of the practical implementation of the FSC Standard for Ukraine on improving forest management in Ukraine in terms of a number of social matters, namely: *48.7% of respondents pointed to compliance with occupational health and safety rules by workers, 32.9% pointed to supporting and improving the well-being of local communities, 22.4% pointed to implementing anti-corruption policies, and 39.5% pointed to promoting gender equality and preventing discrimination on any grounds*. The practical implementation of the FSC Standard for Ukraine has had an impact on improving forest management in terms of *forest management planning* (noted by 40.8% of respondents) and *monitoring of management plan implementation* (noted by 46.1% of respondents). Thus, according to respondents, the practical implementation of the FSC Standard for Ukraine mainly affects the environmental component of forest management in Ukraine, but also has a significant impact on the social and economic components (primarily in terms of management planning and monitoring of management plan implementation).

In the respondents' opinion, indicators of FSC Standard for Ukraine are rather clear and unambiguous for understanding. This is evidenced by their rating on the proposed scale, where rating '1' meant that the indicators were completely unclear and ambiguous, and rating '5' meant that they were completely clear and unambiguous (**Fig. 3**). Most respondents rated the indicators of FSC Standard for Ukraine at '4' and '5' (53.6% and 32.1%, respectively). No respondent gave a rating of '1'.



**Fig. 3. Assessment of indicators of the FSC Standard for Ukraine in terms of their clarity and unambiguity for understanding ('1' – completely unclear and ambiguous, '5' – completely clear and unambiguous)**

Representatives of certification bodies assessed the indicators of the FSC Standard for Ukraine in terms of their clarity and unambiguity for understanding with a rating of '3' (1 respondent) and '4' (1 respondent), while representatives of scientific and educational institutions gave them a '5' (1 respondent), a '4' (2 respondents) and a '3' (1 respondent). Representatives of non-governmental organizations generally recognise the standard indicators as clear and unambiguous, as their score is '5' (2 respondents), '4' (1 respondent) and '3' (1 respondent). A rating of '5' for clarity and unambiguity in understanding the indicators of the FSC Standard for Ukraine was noted by the representative of the authority.

Among those respondents who rated the indicators as '2' or '3' in terms of their clarity and unambiguity for understanding, the following examples were given:

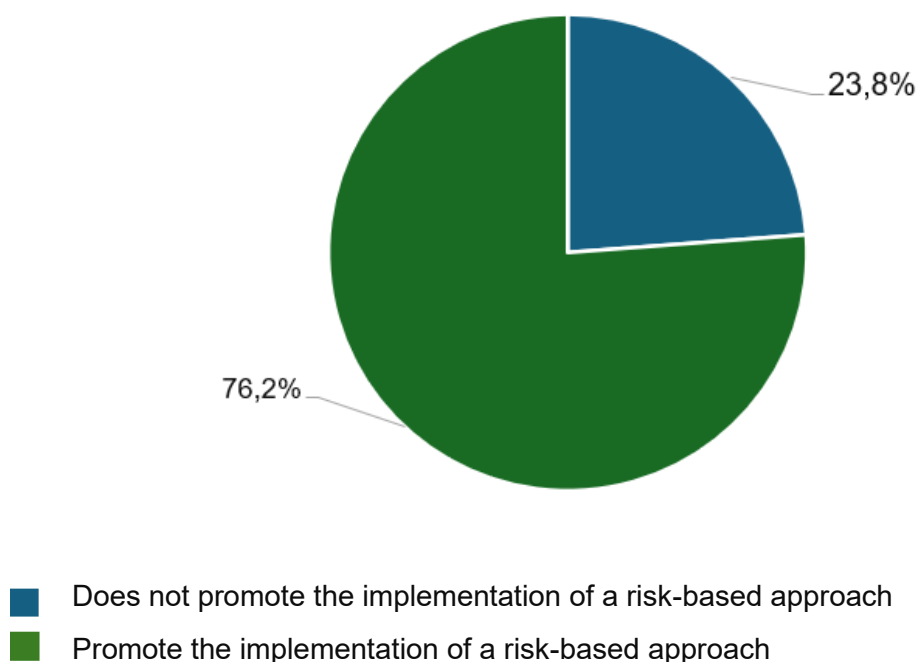
- 1) indicators of principles 6–9, the difficulties with which, according to respondents, are related to the fact that they are not covered by traditional forestry practices and sectoral standards;
- 2) indicators 1.6.4, 4.4.1, 4.4.2, 4.5.1, 5.1.2, 5.4.2, 6.8.1, 6.8.2, 10.3.3.

One respondent indicated that virtually all indicators of the FSC Standard for Ukraine are examples of vagueness and ambiguity in their interpretation, giving them a rating of '3' on the proposed 5-point scale.

In order to obtain the necessary information on the status of biodiversity, one of the respondents under criterion 6.2 pointed to the need to develop relevant national databases. The need to conduct inventory and monitoring of biodiversity was noted.

In addition, one of the respondents pointed out the absence of indicators referring to specific documents, forms, and tables that would serve as confirmation of conformity with their requirements.

The majority of respondents (64 respondents or 76.2%) stated that FSC Standard for Ukraine promotes the implementation of a risk-based approach in decision-making at the level of management units. On the other hand, 23.8% or 20 respondents have the opposite opinion (**Fig. 4**).



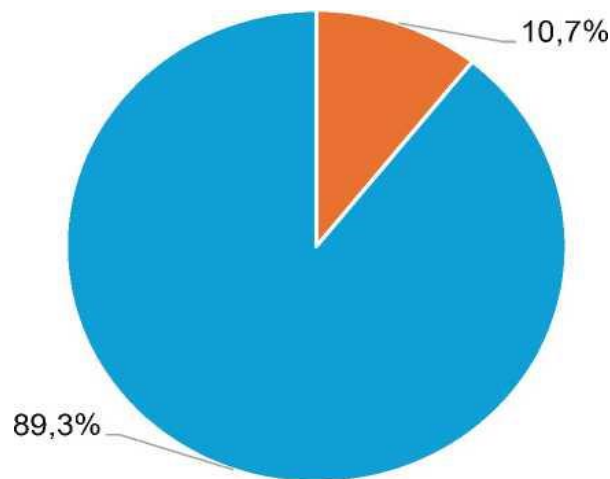
**Fig. 4. Respondents' assessment of the contribution of the FSC Standard for Ukraine in the implementation of a risk-based approach to decision-making at the level of management units**

Representatives of certification bodies, scientific and educational institutions, and government authorities are unanimous in their opinion that the FSC Standard for Ukraine promotes the implementation of a risk-based approach to decision-making. Among representatives of NGOs, only one respondent indicated that the FSC Standard for Ukraine does not promote the implementation of a risk-based approach to decision-making.

Also, the majority of respondents, namely 75 people or 89.3%, expressed their opinion that the FSC Standard for Ukraine promoted the implementation of an adaptive approach in decision-making at the level of management units in the current conditions of impact of various threats on forest management (**Fig. 5**). Representatives of certification bodies, government agencies, scientific and educational institutions, and NGOs are unanimous in their opinion that the FSC Standard for Ukraine promotes the implementation of an adaptive approach to decision-making. Only 9 respondents, or 10.7%, have the opposite opinion.

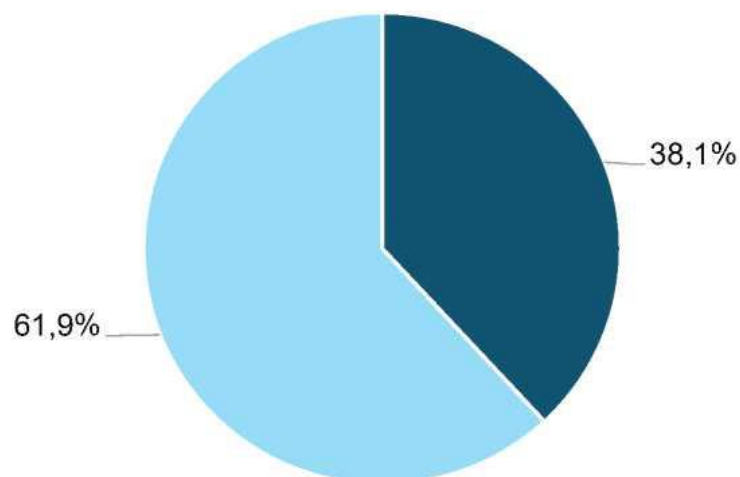
In the opinion of the majority of respondents (52 respondents or 61.9%), the practical implementation of the FSC Standard for Ukraine does not require additional financial costs (except for the cost of the audits). Only 32 respondents (38.1%) indicated that the practical implementation of the FSC Standard in Ukraine requires such costs (**Fig. 6**).

It should be noted that representatives of certification bodies have indicated that the practical implementation of the FSC Standard for Ukraine does not require additional financial costs (except for the cost of the audits). The same answer was given by a government official. However, most representatives of NGOs (3 respondents), as well as most representatives of scientific and educational institutions (3 respondents), pointed to the need for such additional financial costs.



- Does not promote the implementation of adaptive approach
- Promote the implementation of adaptive approach

**Fig. 5. Respondents' assessment of the contribution of the FSC Standard for Ukraine in the implementation of an adaptive approach to decision-making at the level of management units**



- Require additional financial costs
- Does not require additional financial costs

**Fig. 6. Respondents' assessment of the need for additional financial costs (excluding the cost of audits) to ensure the practical implementation of the FSC Standard for Ukraine**

As additional costs associated with the implementation of the FSC Standard for Ukraine, respondents generally point to those related to:

- representative sample areas of native ecosystems and high conservation values (identification of such areas, their support, monitoring);
- rare and threatened species (identification of species listed in the Red Book of Ukraine, their protection);

- biodiversity maintenance, its inventory and monitoring;
- introduction of nature protection technologies and support for appropriate silviculture practices that minimise the impact of management activity on environmental values (e.g. costs of logging equipment, construction of crossings over mountain rivers);
- conducting various types of monitoring as defined by the FSC Standard for Ukraine (e.g., monitoring the impact of management activities on the environment);
- personnel advanced training (various types of training events);
- preparation of informational materials, in particular, appropriately placed signage;
- cooperation with scientific institutions, conducting research, obtaining scientific justification, consulting on various matters, and expert support (mainly in accordance with principles 6 and 9 of the FSC Standard for Ukraine);
- providing work clothes and other personal protective equipment in line with the FSC Standard for Ukraine;
- cooperation with stakeholders, informing them (e.g. local authorities).

Respondents note the need for additional payments to persons responsible for certification at the level of relevant structural units. Respondents also noted the inability to reflect certification costs in the production and financial plan (no corresponding code in the standard plan form).

Among the benefits enjoyed by FSC-certified management units in view of the practical implementation of the FSC Standard for Ukraine, respondents noted those related to:

- increasing the competitiveness of forest products and expanding their markets, both nationally and internationally;
- improving the image and reputation of the forest management units, in particular by demonstrating commitment to international management standards and best practices;
- transparency of forest management and the forest product chain of custody;
- supporting financial stability and economic viability, in particular due to the increase the price of forest products, as well as ensuring the profitability of foreign economic activity;
- marketing policy for promoting forest products;
- improved communication with various stakeholders (e.g. local authorities, local communities, consumers, activists), increased trust in forest management units, and reduction of conflicts;
- strengthening the influence of local communities on decision-making on controversial matters relating to forest management activities and their participation in the planning process;
- ensuring sustainable and rational use of forests, conservation and improvement of the forest fund;
- maintain, protection and conservation of environmental values (in particular, representative sample areas of native ecosystems and high conservation values);
- environmental values monitoring;
- promoting gender equality and avoiding discrimination on any grounds;
- preventing negative impacts on environmental values from management activities;
- application of responsible silviculture practices in terms of forest regeneration, protection, conservation, and harvesting;
- improvement of the management system in a management unit and clearer regulation of processes related to its activities;
- strengthening workers' protection and improving the effectiveness of occupational health and safety systems in the workplace, ensuring social safeguards and benefits;
- increasing the professional responsibility of staff.

By frequency of typical responses to questions about benefits enjoyed by FSC-certified management units in terms of the practical implementation of the FSC Standard for Ukraine, most respondents note primarily the economic aspects related to the competitiveness of certified forest products and expanded sales market access. Environmental aspects relating to the application of responsible silviculture practices

and ensuring the conservation and maintenance of environmental values are also noted. The respondents' answers also reflected social matters concerning the safety of workers, their rights and opportunities.

From the list of factors proposed in the survey that would contribute to the positive impact of the FSC Standard for Ukraine on forest management, respondents most frequently noted those related to: harmonisation of forestry legislation with the requirements of the FSC Standard for Ukraine (71.4% of respondents); motivation of personnel engaged in the implementation of the FSC Standard for Ukraine (69%); methodological and educational support for the practical implementation of the FSC Standard for Ukraine (60.7%). Respondents also noted the introduction of a process-based approach in the forestry management system (45.2%) and targeted funding and investment to meet the requirements of the FSC Standard for Ukraine (41.7%) as factors that will contribute to the positive impact of the FSC Standard for Ukraine on forest management (Annex B).

The following factors will have the lowest contribution to the positive impact of the FSC Standard for Ukraine on forest management: reorganisation of the structure of SFE "Forests of Ukraine" with the transition to a two-level management system (14.3%); risk-based approach in assessing conformity with the requirements of the FSC Standard for Ukraine by certification bodies (19%); reforming the governance of the forestry sector, which involves separating management and control functions (32.1%).

Given the number of mentions, representatives of NGOs mainly focused on factors that would contribute to the positive impact of the FSC Standard for Ukraine on forest management: harmonisation of forestry legislation with the requirements of the FSC Standard for Ukraine; reformation of forestry governance providing for the separation of management and control functions; methodological and educational support for the practical implementation of the FSC Standard for Ukraine; risk-based approach to assessing conformity with the requirements of the FSC Standard for Ukraine by certification bodies; motivation of personnel engaged in the implementation of the FSC Standard for Ukraine.

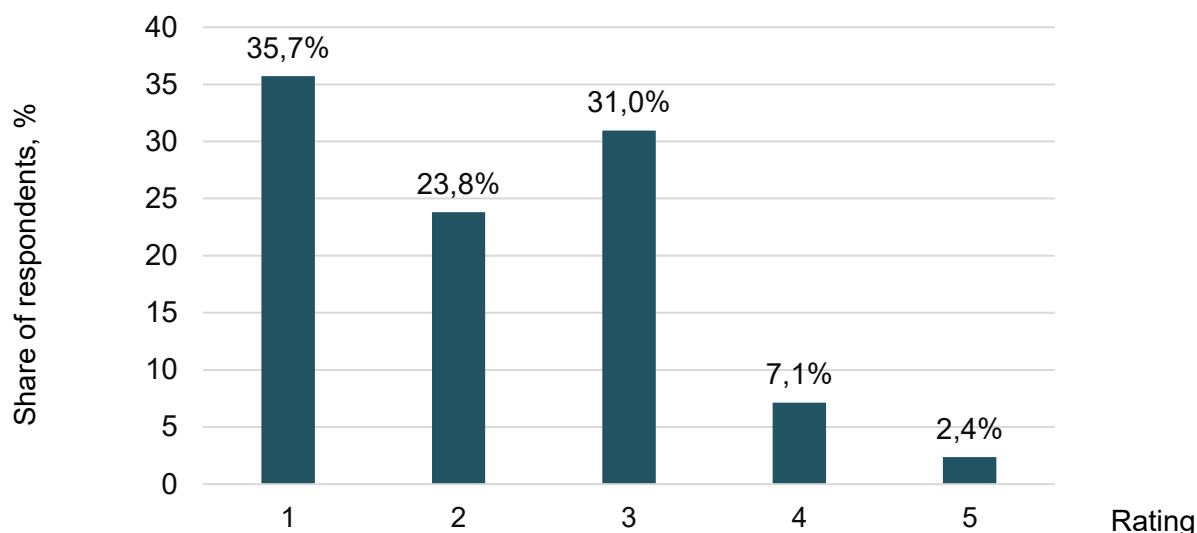
The opinion of certification body representatives regarding factors that will contribute to the positive impact of the FSC Standard for Ukraine on forest management is similar to the above, in particular, the following factors will contribute: harmonisation of forestry legislation with the requirements of the FSC Standard for Ukraine; methodological and educational support for the practical implementation of the FSC Standard for Ukraine; motivation of personnel engaged in the implementation of the FSC Standard for Ukraine. Certification bodies also noted the following factors that will contribute to the positive impact of the FSC Standard for Ukraine: the requirements of certified consumers, the increase in the price of certified products, the introduction of a process-based approach in the management system of forestry organizations, and the risk-based approach in assessing conformity with the requirements of the FSC Standard for Ukraine by certification bodies.

In the respondents' opinion, the FSC Standard for Ukraine does not require immediate revision. This is evidenced by their rating on the proposed scale, where rating '1' meant that there was no need to revision the standard, and rating '5' meant that the standard needed immediate revision (**Fig. 7**). Most respondents rated the necessity of revision of the FSC Standard for Ukraine at '1' to '3' (90.5% in total).

The rating of the urgency of revision the FSC Standard for Ukraine, provided by a government official is '1'. Representatives of certification bodies rated this urgency as '4' and '1'. Representatives of NGOs rated the urgency of revision the FSC Standard for Ukraine as '1' (2 respondents), '3' (1 respondent), and '5' (1 respondent). Representatives of scientific and educational institutions mainly gave ratings '3' (3 respondents) and '2' (1 respondent).

Among the explanations for the urgency of the revision of the FSC Standard for Ukraine respondents pointed out the need to adapt it, taking into account the reorganisation of SFE "Forests of Ukraine", the reformation of Ukraine's forestry sector, and the implementation of the EUDR. They also noted the necessity to adjust the FSC Standard for Ukraine taking into account the ongoing war. Respondents also pointed out the need for: simplification of wording in the standard for better understanding of its requirements and perception by users; provision of interpretations in the standard and details on specific

requirements; correction of minor inaccuracies. The survey emphasised the advisability of revision the requirements of the FSC Standard for Ukraine regarding the environmental values impact assessment in order to avoid their formal implementation in practice and the submission of false information.



**Fig. 7. Assessment of the urgency of revision the FSC Standard for Ukraine ('1' – no need for revision, '5' – requires immediate revision)**

Therefore, summarising the results of the survey on the practical implementation of the FSC Standard for Ukraine and its impact on the level of forest management in the country, it is worth noting the following:

- The survey covers most FSC certificate holders at the level of structural units of SFE "Forests of Ukraine"; other categories of stakeholders are not actively participating;
- The answers to the questions in terms of different categories of stakeholders, in particular representatives of NGOs, government body, certification bodies, scientific and educational institutions, do not contradict the general trends identified during the survey, but highlight certain important aspects in view of the interests of each of the stakeholder groups;
- The practical application of the FSC Standard for Ukraine since 2019 has had a significant impact on improving forest management in Ukraine, primarily in terms of its requirements relating to the maintain, protection and conservation of environmental values and the prevention of negative impacts on them from management activities, as well as ensuring the sustainable use of forests;
- The indicators of the FSC Standard for Ukraine are generally clear and unambiguous; difficulties in some cases are related to the perception of indicators through the prism of traditional forest management practices in accordance with Ukrainian legislation, which may exceed the requirements of the FSC Standard for Ukraine;
- The FSC Standard for Ukraine promotes the implementation of risk-based and adaptive approaches to decision-making at the level of management units;
- The practical implementation of the FSC Standard for Ukraine does not require additional financial costs (except for the cost of the audits); if such additional costs are necessary, they are primarily for the implementation of the requirements of the FSC Standard for Ukraine in terms of representative sample areas of native ecosystems, high conservation values and other elements of environmental values; ensuring responsible silviculture practices that minimise the impact of activities on the environment;

- FSC-certified management units, given the practical implementation of the FSC Standard for Ukraine, primarily enjoy economic benefits related to the competitiveness of certified forest products and the expansion of their sales markets;
- Among the factors that would contribute to the positive impact of the FSC Standard for Ukraine on forest management, respondents most frequently noted those related to: harmonisation of forestry legislation with the requirements of the FSC Standard for Ukraine, motivation of personnel engaged in the standard implementation, methodological and educational support for the standard implementation in practice;
- According to the respondents, the FSC Standard for Ukraine does not need to be revised (except in certain cases where it needs to be adapted to current conditions, primarily related to the reorganisation of SFE "Forests of Ukraine", industry reform, the implementation of EUDR, and the ongoing war).

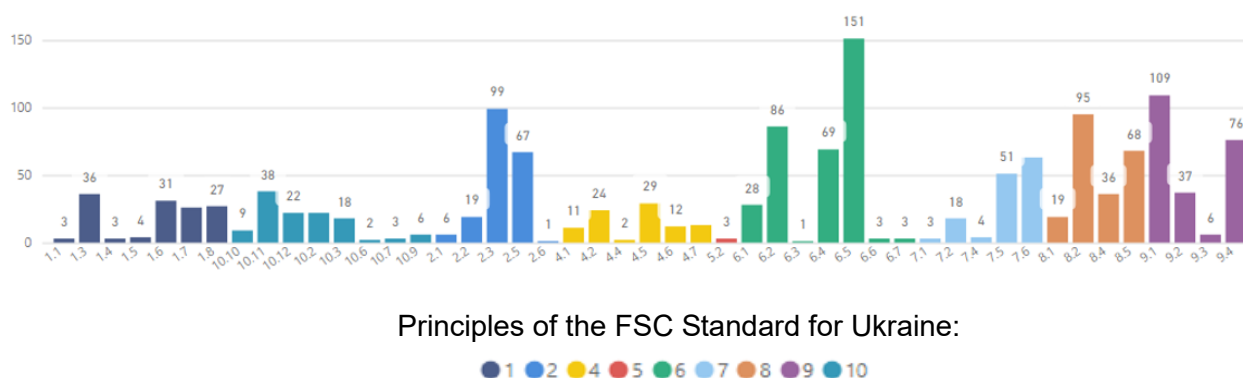
## Analysis of public reports by certification bodies on the assessment of forest management conformity with the FSC Standard for Ukraine

**Purpose of the analysis:** identification of weaknesses in the practical implementation of the FSC Standard for Ukraine based on an analysis of non-conformity to its requirements as indicated in public reports by certification bodies on FSC audits of forest management system.

**Period of the analysis:** from 30/03/2020 to 30/05/2024 (effective date of the FSC Standard for Ukraine V 1-0 – 30/03/2020).

**Sampling:** all public reports on main and surveillance evaluations of forest management conformity to the FSC Standard for Ukraine presented by the following certification bodies: Legallis Limited Liability Company, Preferred by Nature OÜ, Société Générale de Surveillance SA<sup>1</sup>.

Based on the analysis of public reports of the certification bodies on FSC audits of forest management systems, nonconformities with the FSC Standard for Ukraine were classified according to its principles and criteria (**Fig. 8**).



**Fig. 8. Distribution of nonconformities with the FSC Standard for Ukraine based on an analysis of public reports from certification bodies on FSC audits of forest management systems**

<sup>1</sup> The current names of the companies are given as of 2025.

During the period under review, certification bodies identified nonconformities with most of the criteria of the FSC Standard for Ukraine. The most nonconformities were identified under the criteria of Principle 6, mainly under criterion 6.5 (representative sample areas of native ecosystems), 6.2 (assessment of potential impacts of management activities on environmental values), 6.4 (rare and threatened species and their habitats). Overall, the number of nonconformities under Principle 6 criteria during the period under review accounts for 23% of their total number for this period.

In terms of the criteria of Principle 9, the number of nonconformities during the period under review accounts for 16% of their total number for this period. In particular, certification bodies identified the largest number of nonconformities under criteria 9.1 (definition, assessment, registration of high conservation values) and 9.4 (monitoring of high conservation values).

In terms of the criteria of Principle 8 (the number of nonconformities during the period under review for this criterion is 15% of their total number for this period), the largest number of nonconformities relate to criteria 8.2 (monitoring of the environmental and social impacts of the activities within a management unit and changes in its environmental condition) and 8.5 (tracking and tracing system for the sources and volumes of forest products).

The number of nonconformities in terms of the criteria of Principle 2 is also significant; in particular, their number during the period under review for to this criterion accounts for 13% of their total number for this period. The largest number of nonconformities was identified by certification bodies with respect to criteria 2.3 (health and safety practices to protect workers) and 2.5 (job specific training and supervision for the implementation of the management plan and all management activities).

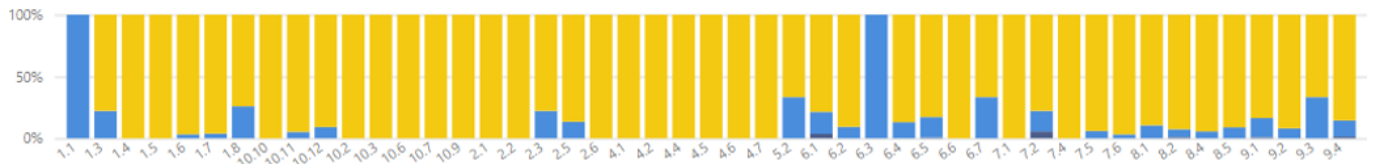
The number of nonconformities in terms of the criteria of Principle 7 is also significant (their number during the period under review for to this criterion accounts for 10% of their total number for this period). In particular, the largest number of nonconformities was identified for criteria 7.5 (public availability of the management plan summary) and 7.6 (stakeholder engagement in the management planning and monitoring processes).

Therefore, the above Fig. 8 indicates the difficulties of practical implementation of the FSC Standard in Ukraine in terms of requirements for environmental values, in particular, representative sample areas of native ecosystems, rare and threatened species and their habitats, and high conservation values. The difficulties primarily concern the identification of these elements of environmental values, their assessment, implementation of measures relating to them, and monitoring. Complications in complying with the requirements of the FSC Standard for Ukraine also include processes for assessing and monitoring the potential impacts of management activities and ensuring the traceability of product origin. Difficulties in ensuring occupational health and safety for workers and their professional training, along with shortcomings in the process of interacting with stakeholders (informing them and engaging them in decision-making), also contribute to nonconformity with the requirements of the FSC Standard for Ukraine.

For certain above-mentioned criteria of the FSC Standard for Ukraine, the proportion of nonconformities with its requirements out of their total number for the period under review does not differ significantly for each certification body (in particular, this applies to nonconformities with the criteria of Principles 6 and 7).

The structure of nonconformities with the requirements of the FSC Standard for Ukraine (by share of each type of nonconformity in their total number) is presented in **Fig. 9**.

As can be seen from **Fig. 9**, the majority of nonconformities with the requirements of the FSC Standard for Ukraine are minor ones. This is also relevant to the structure of nonconformities with the requirements of the FSC Standard for Ukraine in terms of certification bodies.



Types of nonconformities with the FSC Standard of Ukraine:

- Major nonconformities;
- Minor nonconformities

**Fig. 9. Structure of nonconformities with the FSC Standard for Ukraine by their types (in percent) is presented based on an analysis of public reports from certification bodies on FSC audits of forest management systems**

Therefore, analysis of nonconformities with the FSC Standard for Ukraine in terms of relative indicators, in particular in terms of certification bodies, reveals weaknesses in the practical implementation of the FSC Standard for Ukraine in terms of requirements at the level of criteria 2.3 (*compliance with occupational health and safety rules*), 2.5 (*job specific training*), 6.2 (*assessment of the potential impact of management activities on environmental values*), 6.4 (*protection of rare and threatened species and their habitats*), 6.5 (*protection and conservation of representative sample areas of native ecosystems*), 7.5 (*public availability of a management plan summary*), 7.6 (*stakeholder engagement in the management planning and monitoring processes*), 8.2 (*monitoring of environmental and social impacts of activities and changes in the environmental condition of a management unit*), 8.5 (*forest product tracking and tracing system*), 9.1 (*identification and assessment of high conservation values*), 9.4 (*monitoring of high conservation values*). It would be advisable for the Working Group to take these indicators into account when revising the FSC Standard for Ukraine.

## Analysis of changes in the FSC regulatory framework in the context of the relevance of the FSC Standard for Ukraine

Within the framework of the presented report on the practical implementation of the FSC Standard for Ukraine, it is advisable to consider changes in 'FSC Principles and Criteria for Forest Stewardship' (standard FSC-STD-01-001 V 5-3, <https://connect.fsc.org/document-centre/documents/resource/392>) and 'International Generic Indicators' (standard FSC-STD-60-004 V 2-1, <https://connect.fsc.org/document-centre/documents/resource/262>).

As compared to V 5-2 of FSC Principles and Criteria for Forest Stewardship (FSC-STD-01-001), based on which the FSC Standard for Ukraine was developed, attention should be paid to the following changes in its V 5-3 (March 2023):

- changes in criteria 6.9, 6.10 and adding criterion 6.11, as well as the new definition of the term 'Very limited portion' and changes in the definition of the term 'Restoration/ecological restoration';
- changes in criteria 4.2, 4.8 and adding a new criterion 4.X.

With regard to criteria 6.9, 6.10 and 6.11 in V 5-3 FSC-STD-01-001, the need for their observation by both certificate holders/applicants and certification bodies within the framework of compliance assessment to FSC Forest Stewardship Standards is determined by ADVICE-20-007-22 'Advice Note on Requirements for Certificate Holders introduced by the Policy to Address Conversion and M37/2021' (effective from 01/07/2023, <https://connect.fsc.org/document-centre/documents/resource/394>). Policy to

Address Conversion (<https://connect.fsc.org/document-centre/documents/resource/1445>) and FSC General Assembly Resolution M37/2021 form the basis of this document. After updating based on FSC-STD-60-004 V 2-1 FSC forest Stewardship Standards for countries and completing their transition period, this recommendation will no longer apply thereto. Therefore, the requirements related to the Policy to Address Conversion and the resolution adopted by the FSC General Assembly M37/2021 and implemented in criteria 6.9, 6.10 and 6.11 of FSC-STD-01-001 V 5-3, as well as in the relevant indicators of FSC-STD-60-004 V 2-1, are already part of responsible forest management in Ukraine in accordance with the requirements of FSC certification.

It should also be noted that the updated criteria 6.9, 6.10 and the new criterion 6.11 of V 5-3 FSC-STD-01-001 are included in Annex J of the FSC Standard for Ukraine 'FSC criteria, indicators and verifiers for excision of areas contaminated with explosive objects from the scope of certification in accordance with FSC-POL-20-003 V 1-0 for Ukraine'.

With regard to changes in criterion 4.2 and the addition of new criterion 4.X, the concept of Free, Prior and Informed Consent is not applied in Ukraine. Taking this into account, the indicators for criterion 4.2 in the current FSC Standard for Ukraine have been adapted. In addition, criterion 4.8 is recognised as inapplicable in the FSC Standard for Ukraine, as Ukraine lacks traditional knowledge of forest management and the corresponding legal framework for its use. Therefore, the specified changes in the criteria of Principle 4 of V 5-3 FSC-STD-01-001 are not actually applicable to Ukraine.

With regard to changes in V 2-1 of the standard 'International Generic Indicators', it is worth noting ADVICE-60-006-02 V 1-0 approved on 16/12/2021 (Advice Note on Incorporation of new or revised International Generic Indicators introduced in future versions of FSC-STD-60-004 into National Standard (National Forest Stewardship Standards and Interim National Standards), <https://connect.fsc.org/document-centre/documents/resource/517>), according to which the changes in the 'International Generic Indicators' shall be taken into account in the FSC Forest Stewardship standards of the countries no later than the next planned regular review and revision of these standards.

A number of changes in V 2-1 of the 'International Generic Indicators' (FSC-STD-60-004), as compared to their V 1-0 are not significant for Ukraine as they concern requirements, which are not applicable in the country. In particular, these are changes in the requirements for intact forest landscapes, as well as changes related to the concept of Free, Prior and Informed Consent, made in 2018.

Other changes in V 2-1 of the 'International Generic Indicators' (FSC-STD-60-004) compared to V 1-0 require attention, in particular those:

- related to the integration of the content of the 'FSC report on generic criteria and indicators based on ILO Core Conventions principles', which was approved by the FSC Board of Directors in August 2017 ([https://fsc.org/sites/default/files/2019-07/FSC%20Report%20on%20generic%20criteria%20and%20indicators%20based%20on%20ILO%20Core%20Conventions%20principles\\_EN.pdf](https://fsc.org/sites/default/files/2019-07/FSC%20Report%20on%20generic%20criteria%20and%20indicators%20based%20on%20ILO%20Core%20Conventions%20principles_EN.pdf));
- aimed at ensuring conformity of the requirements to verification of transactions with standard FSC-STD-40-004 V3-0 'Chain of Custody Certification', paragraph 1.7 (now its paragraph 1.9 in FSC-STD-40-004 V3-1 'Chain of Custody Certification', <https://connect.fsc.org/document-centre/documents/resource/302>), and ADVICE 40-004-14 'Supply Chain Integrity' (now it has been excluded from 'FSC Directive on Chain of Custody Certification', <https://connect.fsc.org/document-centre/documents/resource/173>);
- based on 'FSC Pesticides Policy' (FSC-POL-30-001 V 3-0, <https://connect.fsc.org/document-centre/documents/resource/208>), including changes in criterion 10.7 and the new Annex J ('International Generic Indicators for the use and risk management of highly hazardous pesticides').

In general, the above changes in V 2-1 of the 'International Generic Indicators' (FSC-STD-60-004) compared to V 1-0 determine the need to revise the content of the FSC Standard for Ukraine in terms of indicators for a number of criteria, for example, 2.1, 2.2, 8.5, 10.7 and others, as well as Annexes. Updates

in V 2-1 of 'International Generic Indicators' (FSC-STD-60-004) both clarify and supplement the requirements of V 1-0. Such updates are important primarily in terms of taking into account current trends in ensuring environmentally appropriate, socially beneficial and economically viable forest management and combating challenges that potentially threaten responsible management.

Taking into account the current FSC priorities for 2025 – 2027 (ADV-STD-60-006\_05, <https://connect.fsc.org/document-centre/documents/resource/2101>), additional introduction of a number of requirements into the FSC regulatory framework in the form of guidelines that are currently mandatory, the above-mentioned changes in the FSC regulatory framework are not critical for ensuring responsible forest management in Ukraine and do not affect the relevance of the FSC Standard for Ukraine. A number of technical changes, such as transferring Annex C on additional requirements for ecosystem services from the 'International Generic Indicators' to FSC-PRO-30-006 'Ecosystem Services Procedure: Impact Demonstration and Market Tools' (<https://connect.fsc.org/document-centre/documents/resource/316>), does not influence on the relevance of FSC Standard for Ukraine either. However, FSC Ukraine and the Working Group should focus primarily on matters related to the updated FSC policy on pesticides, as well as the implementation of the core conventions of the International Labour Organization in the field of forestry. This requires them to conduct an in-depth analysis of the current situation regarding these issues, ensuring the broad consultation with stakeholders, as well as integrating these matters into the information, communication, training, and methodological support for the practical implementation of the FSC Standard for Ukraine.

## Analysis of the impact of extraordinary circumstances related to armed aggression against Ukraine on the relevance of the FSC Standard for Ukraine

The extraordinary circumstances in Ukraine are related to Russia's armed aggression against Ukraine, which began on 20 February 2014 and escalated into a full-scale military attack by Russia on Ukraine on 24 February 2022. Support for FSC certificate holders in Ukraine, along with protecting and ensuring the integrity of the FSC certification system, have been the focus of changes in the FSC regulatory framework since the full-scale military attack on Ukraine.

In connection with Russia's full-scale military attack on Ukraine, the changes primarily affected a number of elements of the FSC certification system, defining the operating environment for FSC certificate holders/applicants and certification bodies. In particular, the decisions were aimed at:

- ensuring the FSC Int. ability to stipulate controlled wood risk designations in case of emergency situations (FSC-ADV-60-002-01, <https://connect.fsc.org/document-centre/documents/resource/1217>);
- review of the National Risk Assessment for Controlled Wood for Ukraine in terms of risk definitions and corresponding control measures, and approval of V 2-0 of this document (FSC-NRA-UA V 2-0, <https://connect.fsc.org/document-centre/documents/resource/340>);
- adaptation of due diligence systems to urgently revised FSC risk assessments (ADVISE-40-005-25, <https://connect.fsc.org/document-centre/documents/resource/175>; INT-ADV-40-005-25\_01, <https://connect.fsc.org/forest-management-certification/fsc-requirements-updated-enforce-decision-reject-fsc-material-conflict-areas>);
- suspension of trade in FSC certified and FSC controlled wood (ADVISE-20-001-12, <https://connect.fsc.org/document-centre/documents/resource/1218>, INT-ADV-20-001-12\_01, INT-ADV-20-001-12\_02, <https://connect.fsc.org/forest-management-certification/fsc-requirements-updated-enforce-decision-reject-fsc-material-conflict-areas>);
- adaptation of certification bodies' activities in the process of assessing the conformity of forest management systems with the requirements of the FSC Standard for Ukraine, as well as in the process of

assessing the chain of custody (FSC-DER-2022-003, FSC-DER-2022-004, FSC-DER-2022-005, FSC-DER-2022-006, INT-STD-30-005\_14, INT-STD-40-003\_06, INT-PRO-20-003\_11, <https://connect.fsc.org/forest-management-certification/fsc-requirements-updated-enforce-decision-reject-fsc-material-conflict-areas>).

All of the above decisions in the FSC system have an overall impact on the practical implementation of the FSC standard in Ukraine, but not on the relevance of its requirements in the context of Russia's armed aggression against Ukraine. However, a number of the aforementioned and other decisions within the FSC system have determined the possibility of supplementing the requirements of the FSC Standard for Ukraine in terms of excision of areas contaminated with explosive objects from the scope of certification in Ukraine. The regulatory basis for developing criteria, indicators and verifiers for excision of areas contaminated with explosive objects from the scope of certification includes: [FSC-ADV-20-001-12](https://fsc.org/en/document-centre/documents/resource/1218) (relates to the consequences of uncontrollable or non-auditable risks that generally affect the forestry sector, <https://fsc.org/en/document-centre/documents/resource/1218>), [INT-ADV-20-001-12\\_02](https://connect.fsc.org/document-centre/documents/resource/379) (clarification of requirements and sources of information regarding the suspension of FSC certificates or reduction of their scope, <https://connect.fsc.org/document-centre/documents/resource/379>), INT-POL-20-003\_14 (specifies the conditions of application of [FSC-POL-20-003 V 1-0](https://connect.fsc.org/document-centre/documents/resource/381) regarding areas affected by armed conflict, <https://connect.fsc.org/document-centre/documents/resource/381>, <https://connect.fsc.org/document-centre/documents/resource/218>).

The process of developing FSC criteria, indicators and verifiers for excision of areas contaminated with explosive objects from the scope of certification in accordance with FSC-POL-20-003 V 1-0 for Ukraine was carried out by the Working Group during the period from October 2022 to October 2023 in accordance with the registered PSU application for support of the FSC Standard for Ukraine. The use of various sources of information, including the results of surveys of management units, executive authorities, national legislation in the field of handling explosive objects, scientific knowledge and experience of Working Group members and experts, as well as extensive consultations with stakeholders, contributed to the development of a high-quality document that addresses the challenges associated with excision of areas contaminated with explosive objects from the scope of certification.

Currently, FSC criteria, indicators and verifiers for excision of areas contaminated with explosive objects from the scope of certification in accordance with FSC-POL-20-003 V 1-0 for Ukraine are included as an Annex to the FSC Standard for Ukraine, V 1-1 (FSC-STD-UKR-01.1-2024). The requirements of this Annex take into account the national context and legislation of Ukraine and are based on systematic, process-oriented, adaptive and risk-based approaches. The requirements of the Annex are specific and clear, covering both the management system and management practices, and increasing the responsibility of FSC certificate holders in terms of management, taking into account areas contaminated with explosive objects.

Therefore, the extraordinary circumstances related to Russia's armed aggression against Ukraine are taken into account in V 1-1 of the FSC Standard for Ukraine (FSC-STD-UKR-01.1-2024). Accordingly, at present, the extraordinary circumstances associated with Russia's armed aggression against Ukraine do not affect the relevance of the FSC Standard for Ukraine and do not require its extraordinary or regular review.

## Analysis of the impact of reforming the forestry sector governance system in Ukraine on the relevance of the FSC Standard for Ukraine

Ukrainian legislation defines the directions for the development and reform of the forestry sector. In particular, according to the 'State Strategy for Forest Governance in Ukraine until 2035' dated 29/12/2021

No. 1777-r (<https://zakon.rada.gov.ua/laws/show/1777-2021-%D1%80#Text>), one of the mentioned issues in the field of forestry is imperfect distribution of government functions, which in some cases leads to duplication of functions or failure to perform them. This and other factors were the basis for reforming forestry sector, as defined, among other things, by the Resolution of the Cabinet of Ministers of Ukraine 'Some Matters of Reforming of forestry sector governance' dated 07/09/2022 No. 1003 (<https://zakon.rada.gov.ua/laws/show/1003-2022-%D0%BF#Text>). This resolution provides for the liquidation of the territorial bodies of the State Forest Resources Agency of Ukraine as legal entities under public law and the establishment of interregional territorial bodies of the State Forest Resources Agency of Ukraine as legal entities under public law. This resolution establishes the creation of the state specialised enterprise "Forests of Ukraine" (hereinafter referred to as SFE "Forests of Ukraine") and the accession to it of specialised state forestry enterprises that fall under the jurisdiction of the State Forest Resources Agency of Ukraine (at the time of accession, it was the forestry enterprises that held FSC certificates). The aforementioned legislation also emphasises the preservation of state ownership of the State Enterprise "Forests of Ukraine" and the joint-stock company subsequently established on its basis.

Currently, after several stages of reform, the organizational structure of SFE "Forests of Ukraine" consists of 12 regional branches and 97 forestry management units. SFE "Forests of Ukraine" manages an area of 7.3 million hectares, which accounts for 70% of the total forest area of Ukraine. The holders of FSC certificates are currently forestry management units (<https://app.powerbi.com/view?r=eyJrIjojN2U3NGMyNWWEtZTAxNS00MzVhLWExNmMtOTlhZjdiYjQ4MWNkIiwidCI6IjEyNGU2OWRiLWVmNjUtNDk2Yi05NmE5LTVkNTZiZWxZDI5MSIsImMiOjI9>).

Since the beginning of the reform process in Ukraine's forestry sector, the FSC has emphasised the potential for the certification system to function under different governance models chosen by the country's government. It is important to ensure the continuity of FSC certificate holders' activities and the supply chain for FSC-certified products (<https://ua.fsc.org/ua-en/newsfeed/fsc-ready-to-face-a-major-forest-reform-in-ukraine>).

The most controversial points in the process of reforming the organizational structure of SFE "Forests of Ukraine" were primarily those related to the ability of the structural units of SFE "Forests of Ukraine" to comply with the requirements of the FSC Standard for Ukraine and ensure the integrity of supply chains; an acceptable certification model (individual, group, multiple); planning of assessments of conformity with FSC standards by certification bodies (<https://ua.fsc.org/ua-en/newsfeed/fsc-certification-in-the-context-of-the-third-stage-of-forestry-reform>).

Ensuring a broad consultation process between FSC representatives, certification bodies, FSC certificate holders, the State Forest Resources Agency of Ukraine and other stakeholders contributed to the preservation of FSC certification and minimisation of risks to the system. The response to potential threats in the process of reforming the organizational structure of SFE "Forests of Ukraine" was as follows:

- self-assessment of the impact of changes in the management system on the ability to ensure responsible management at the level of management units and the central office of SFE "Forests of Ukraine";
- application by certification bodies of a risk-based approach in assessing the conformity of management units with the requirements of FSC standards (<https://ua.fsc.org/ua-en/newsfeed/fsc-certification-has-been-maintained-in-the-face-of-the-forestry-reform>, <https://ua.fsc.org/ua-en/node/29732>).

As part of the process of reforming the organizational structure of SFE "Forests of Ukraine", a series of FSC interpretations contributed to balanced and effective decisions on ensuring responsible forest management in Ukraine and the integrity of the supply chain for FSC-certified products:

- *INT-STD-20-001\_45* dated 15/02/2023 (on the possibility of certifying branches of SFE "Forests of Ukraine" after changes in structure and legal form in accordance with the Resolution of the Cabinet of Ministers of Ukraine 'Some Matters of Reforming of forestry sector governance' dated 07/09/2022 No.

1003 and other laws and regulation; on requirements of the certification bodies regarding signature by their clients, branches of SFE "Forests of Ukraine", of the License Agreement for the FSC Certification Scheme according to the changes in the structure and legal form of SFE "Forests of Ukraine", <https://connect.fsc.org/document-centre/documents/resource/379>);

– *INT-STD-01-001\_18* (also published under FSC-STD-20-001 with code INT-STD-20-001\_50, and FSC-STD-UKR-01.1-2024 with code INTSTD-UKR-01.1-2024\_01) dated 29/01/2025 (on the possibilities and conditions for certification of forestry management units belonging to branches of SFE "Forests of Ukraine" (forest offices), as well as on the requirements of certification bodies regarding the signature by their clients, forestry management units, of the Licence Agreement for the FSC Certification Scheme in response to the reorganisation and change in the structure of SFE "Forests of Ukraine", <https://connect.fsc.org/document-centre/documents/resource/381>).

Therefore, the basis for reforming the forestry sector governance system in Ukraine is, first and foremost, the need to improve the distribution of state functions: separation of legislative and supervisory functions from management activities. Accordingly, the changes in the reform process touched both the authority responsible for implementing state policy in the field of forestry and hunting – the State Forest Resources Agency of Ukraine – and led to the creation of SFE "Forests of Ukraine" as a business entity. Potential threats to responsible forest management and the integrity of FSC-certified product supply chains are linked not so much to the process of reforming the forestry sector governance system in Ukraine as a whole, but rather to the multi-stage reform of the organizational structure of SFE "Forests of Ukraine" and changes in its legal status (it is the structural units of SFE "Forests of Ukraine" that hold FSC certificates). These potential threats are determined by the ability to ensure the practical implementation of the FSC Standard for Ukraine and do not directly relate to the content of the Standard. The ability to meet its requirements is influenced by changes in the management system of the management unit related to the formation and implementation of processes, the provision of resources for them, the definition of the powers and responsibilities of workers, etc. This was the subject of self-analysis of the management system of SFE "Forests of Ukraine", as well as a component of the risk-based approach of certification bodies in the context of assessing conformity with FSC standards.

Thus, the content of the FSC Standard for Ukraine remains relevant both in terms of reforming the forestry sector governance system in Ukraine as a whole and in terms of changes in the organizational structure of SFE "Forests of Ukraine".

## Conclusions on the relevance of the FSC Standard for Ukraine and the need for its revision

Conclusions regarding the relevance of the FSC Standard for Ukraine and the need for its revision are based on an:

- analysis of the results of a stakeholder survey on the experience of implementing the FSC Standard for Ukraine,
- analysis of public reports by certification bodies on the assessment of forest management conformity with the FSC Standard for Ukraine,
- analysis of the impact of a number of factors on the relevance of the Standard, such as: changes in the FSC regulatory framework; extraordinary circumstances related to armed aggression against Ukraine; the process of reforming the forestry sector governance system in Ukraine.

Summarising the components of this report, let us note the following:

- The experience of practical implementation of the FSC Standard for Ukraine and its impact on the level of forest management in the country were assessed on the basis of a survey, respondents were

mainly FSC certificate holders (structural units of SFE "Forests of Ukraine"), as well as other stakeholders representing NGOs, government body, certification bodies, scientific and educational institutions; the results of the survey of respondents on the experience of practical implementation of the FSC Standard for Ukraine show that:

- ✓ The requirements of the Standard have a significant impact on improving forest management, especially those relating to environmental values and ensuring sustainable use of forests; the implementation of these and other requirements for responsible silviculture practices requires additional financial costs (this is indicated in the respondents' free-form answers, although in general there is no indication of a need for additional funding to implement the FSC Standard requirements);

- ✓ The clarity and unambiguity of the indicators is an advantage of the Standard, but perceiving them solely through the prism of forest management practices defined by Ukrainian legislation, rather than additional voluntary commitments that may exceed the requirements of the legislation, may cause certain difficulties in the practical implementation of the Standard;

- ✓ Contributing to the improvement of the management system in terms of risk-based and adaptive approaches to decision-making is an advantage of the practical implementation of the FSC Standard for Ukraine;

- ✓ Mentioning mostly economic benefits associated with the competitiveness of certified forest products and the expansion of their sales markets, respondents believe that the harmonisation of forestry legislation with the requirements of the FSC Standard, appropriate staff motivation, and methodological and educational support for its practical implementation will contribute to the positive impact of the FSC Standard for Ukraine on forest management;

- ✓ Overall, the respondents' survey on the practical implementation of the FSC Standard for Ukraine did not reveal any need for its revision, except in isolated cases where it needed to be adapted to current conditions;

- Analysis of public reports by certification bodies on FSC audits of forest management systems helped identify weaknesses in the practical implementation of the FSC Standard for Ukraine, particularly those relating to the implementation of requirements concerning: *environmental values* (identifying their elements, assessing values, implementing measures in relation to them, monitoring); *assessing and monitoring the impact of management activity*; *compliance with occupational health and safety rules for workers*, as well as their *professional training*; *informing and engaging stakeholders in decision-making*; *forest product tracking and tracing system*;

- The analysis of changes in the FSC regulatory framework in the context of the relevance of the FSC Standard for Ukraine was carried out primarily in terms of the 'FSC Principles and Criteria for Forest Stewardship' (Standard FSC-STD-01-001 V 5-3) and the 'International Generic Indicators' (Standard FSC-STD-60-004 V 2-1); taking into account the current priorities of the FSC for 2025–2027 and the content of the relevant mandatory FSC guidelines, the changes in the FSC regulatory framework for the specified components are not critical for ensuring responsible forest management in Ukraine and do not affect the relevance of the FSC Standard for Ukraine; however, FSC Ukraine and the Working Group should focus on matters relating to the updated FSC Pesticides Policy and the implementation of the core conventions of the International Labour Organisation in the field of forestry;

- The impact of extraordinary circumstances related to armed aggression against Ukraine on the relevance of the FSC Standard for Ukraine has been analysed with a retrospective look at the regulatory framework for the development of FSC criteria, indicators and verifiers for excision of areas contaminated with explosive objects from the scope of certification for Ukraine; currently, the extraordinary circumstances related to Russia's armed aggression against Ukraine are taken into account in V 1-1 of the FSC Standard for Ukraine (FSC-STD-UKR-01.1-2024) by supplementing it with the Annex 'FSC criteria, indicators and verifiers for excision of areas contaminated with explosive objects from the scope of certification in accordance with FSC-POL-20-003 V 1-0 for Ukraine';

- An analysis of the impact of reforming the forestry sector governance system in Ukraine, as defined by Ukrainian legislation, on the relevance of the FSC Standard for Ukraine was carried out taking into account the possibility of operating the FSC certification system under different governance models in

the country; changes that have taken place both at the level of government bodies (in particular, the State Forest Resources Agency of Ukraine) and management units (the establishment of SFE "Forests of Ukraine" and its reorganisation) as part of the reform of the forestry sector governance system in Ukraine, these changes have a greater impact on the ability to ensure the practical implementation of the FSC Standard for Ukraine than on the relevance of its content; the response to potential threats to the continuity of FSC certificate holders operations and the supply chain of FSC-certified products lies in adapting the management system of established management units to ensure responsible management, as well as in the risk-based approach applied by certification bodies in assessing the conformity of management units with FSC standards;

- With account of the performed analysis of the practical implementation of the FSC Standard for Ukraine in the period from 30/03/2020 to 01/09/2025, the Working Group decided that it was not advisable to revision the Standard (Minutes No. 3 dated 26/09/2025);

- Identified weaknesses in the practical implementation of the Standard based on the analysis of public reports of certification bodies on FSC audits of forest management systems, potential risks to the continuity of FSC certificate holders operations and the supply chain of FSC-certified products in the context of reforming the forestry sector governance system in Ukraine, along with changes in the FSC regulatory framework in terms of FSC principles, criteria and indicators, should be taken into account by FSC Ukraine and the Working Group in the process of systematic analysis of the practical implementation of the FSC Standard for Ukraine and the formation of their activities taking into account its results.

**Annex A. Elements of the FSC Standard for Ukraine, in which, according to respondents, there has been an improvement in forest management based on the results of its practical application since 2019**

Elements of the FSC Standard for Ukraine, in which forest management has improved	Number and percentage of respondents who chose the relevant item
<b>Implementation of anti-corruption policy</b>	17 respondents (22.4%)
<b>Promoting gender equality and avoiding discrimination on any grounds</b>	30 respondents (39.5%)
<b>Compliance of workers with occupational health and safety rules (including labour protection, as additionally specified by the respondent)</b>	37 respondents (48.7%)
<b>Supporting and improving the well-being of local communities</b>	25 respondents (32.9%)
<b>Ensuring sustainable use of forests</b>	48 respondents (63.2%)
<b>Maintain, protection and conservation of environmental values</b>	61 respondents (80.3%)
<b>Preventing negative impacts on environmental values from management activities</b>	53 respondents (69.7%)
<b>Management planning</b>	31 respondents (40.8%)
<b>Monitoring of management plan implementation</b>	35 respondents (46.1%)
<b>Application of responsible silviculture practices (for forest regeneration, protection, conservation, and harvesting)</b>	36 respondents (47.4%)

**Annex B. Factors that, according to respondents, will contribute to the positive impact of the FSC Standard for Ukraine on forest management**

<b>Factors that will contribute to the positive impact of the FSC Standard for Ukraine on forest management</b>	<b>Number and percentage of respondents who chose the relevant factor</b>
<b>Harmonisation of forestry legislation with the requirements of the FSC Standard for Ukraine</b>	60 respondents (71.4%)
<b>Implementation of a process-based approach in the management system of forestry organizations</b>	38 respondents (45.2%)
<b>Reforming forest industry governance, which involves separating management and control functions</b>	27 respondents (32.1%)
<b>Reorganisation of the structure of SFE "Forests of Ukraine" with the transition to a two-tier management system</b>	12 respondents (14.3%)
<b>Risk-based approach in assessing conformity with the requirements of the FSC Standard for Ukraine by certification bodies</b>	16 respondents (19%)
<b>Methodological and educational support for the practical implementation of the FSC Standard for Ukraine</b>	51 respondents (60.7%)
<b>Targeted financing and investments to ensure compliance with the requirements of the FSC Standard for Ukraine</b>	35 respondents (41.7%)
<b>Motivation of personnel engaged in the implementation of the FSC Standard for Ukraine</b>	58 respondents (69%)
<b>Requirements of certified consumers / increase in the price of certified products (respondent's own answer)</b>	1 respondent (1.2%)



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