



FSC self-assessment for FSC core labour requirements – Australia

This tool is designed for all FSC Chain of Custody (CoC) Certificate Holders (CHs) in Australia. With the publication of FSC-STD-40-004 V3-1, CHs are required to complete a self-assessment of their conformance to the FSC core labour requirements (hereinafter: self-assessment) as part of their annual audit.

All organizations must comply with the FSC core labour requirements by 31 December 2022.

The self-assessment is designed to give CoC CHs the ability to efficiently identify and document measures that demonstrate conformance with the FSC core labour requirements. Namely:

- The organization shall not use child labour (FSC-STD-40-004 V3-1, 7.2).
- The organization shall eliminate all forms of forced and compulsory labour (7.3).
- The organization shall ensure that there is no discrimination in employment and occupation (7.4).
- The organization shall respect freedom of association and the effective right to collective bargaining (7.5).

To achieve conformity with the FSC core labour requirements, CHs shall adopt and implement:

- A policy statement, or statements, that encompass the FSC core labour requirements. The policy statements shall be made available to affected and interested stakeholders and to the organization's certification body (1.5)
- An up-to-date self-assessment (this document or similar) and relevant documentation (1.6).

The organization may demonstrate compliance with other certifications schemes as evidence of conformity (1.11). These schemes will be determined by FSC International in due course.

Organizations must submit a completed and signed self-assessment to their certification body prior to their scheduled audit.



The certification body will use the completed self-assessment to guide the audit and verify conformance with the standard. The process applies the organization's knowledge of its operations and compliance with applicable laws to assist the auditor in completing the audit.

The Modern Slavery Act 2018

The [Modern Slavery Act 2018](#) has been enacted and requires all organizations turning over more than \$100M per annum to publicly report on their activities to eradicate slavery in their supply chains. Mirror legislation exists in NSW for organizations that turn over more than \$50M per annum. These requirements largely mirror the FSC core labour requirements.

Organizations eligible under the Act must have completed due diligence and provided reports to the Department of Home Affairs for uploading to the public database located at:
<https://modernslaveryregister.gov.au/>

Who does the FSC core labour requirements apply to?

The FSC core labour requirements apply to FSC-certified organisations and to companies who act as outsourcers and subcontractors to FSC CoC-certified organizations in accordance with FSC-STD-40-004 V3-1, section 13. Read more in the [FSC's core labour requirements FAQ](#)

Legislation helps but is not enough

While legislative frameworks across Australia's states and territories mostly align with the FSC core labour requirements, it is not sufficient for CHs to simply list the relevant legal requirements. Rather, where legislation aligns with the FSC core labour requirements, CHs are required to document how they comply with the legislation.

The use of the self-assessment

CHs and organizations wishing to become certified are not required to use this self-assessment but would need to substitute it with a similar tool. The use of the self-assessment does not guarantee conformity with the FSC core labour requirements. It is the responsibility of the organization to conform with FSC requirements.

The organization shall declare on the self-assessment that the statements are true and correct to the best available knowledge. If an organization knowingly makes false statements on its self-assessment this may result in suspension or termination of the certificate. The organization shall



respond to the questions in the self-assessment as completely and truthfully as possible. Organizations shall identify relevant documents and other materials that the auditor can review to verify the referenced statement on the self-assessment.

The self-assessment was prepared by FSC ANZ. For further clarification or input to the self-assessment, please email info@au.fsc.org.

Version History

Version	Date	Comment
1.0	30.08.2021	Publication



FSC core labour requirements self-assessment

Attestation: I ANDREW WASHINGTON, hereby affirm that the following statements are true and correct to the best of my knowledge, and I acknowledge making a knowingly false statement can result in the suspension or termination of the certificate or non-issue of the certificate.



Name

27/1/26.

Date

Child Labour

Requirement	Questions and additional Requirements	Answer and evidence
7.2 The organization shall not use child labour.	a) Does your organization comply with Clause 7.2? If yes, continue at c).	☒ Yes, I comply with the applicable state and territory legislation that addresses this FSC core labour requirement as identified in Annex A. ☐ No, see b)
7.2.1 The organization shall not employ workers below the age of 15, or below the minimum age as stated under national, or local laws or regulations, whichever age is higher, except as specified in 7.2.2.	b) If the answer is no to a) above, please describe how or why your organization does not comply with Clause 7.2.	
7.2.2 In countries where the national law or regulations permit the employment of persons between the ages of 13 to 15 years in light work, such employment should not interfere with schooling nor, be harmful to their health or development. Notably, where children are subject to compulsory education laws, they shall work only outside of school hours during normal day-time working hours.	c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.2.	I can demonstrate this compliance in the following ways: ☒ Tax file number declarations or VEVO checks (for visa holders) are used for each employee. These include date of birth, which demonstrates that we meet this FSC core labour requirement. ☐ Apprentices and trainees are signed up through an Australian Apprenticeships Support Network provider into a Training Contract with the Australian Government. This ensures that no person under the age of 18 is employed in hazardous or heavy work outside an approved apprenticeship or traineeship, which demonstrates that we meet this FSC core labour requirement. ☐ Other:
7.2.3 No person under the age of 18 is employed in hazardous or heavy work		



except for the purpose of training within approved national laws and regulation. 7.2.4 The organization shall prohibit the worst forms of child labour.	d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.2. e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.2. Please describe them, and how they impact your ability to comply with Clause 7.2. f) Attach a policy statement, or statements, made by your organization that encompasses Clause 7.2.	Documents, records or policies, etc. that show compliance with this FSC core labour requirement are as follows: ☒ Tax file number declarations and VEVO checks ☐ Training contract with the Australian Government for apprentices and trainees. ☐ Other/further details ☐ See attached policies, statements, etc. ☒ See online public policies at: https://jimpetail.com.au/sustainability ☐ Other:
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Annex A

Australia is signatory to seven of the eight fundamental ILO Conventions. Australia has not ratified 'C138 Minimum Age Convention, 1973'. Below is a list of legal minimum working age, compulsory school age and type of work by state and territory as well as a determination of the highest applicable requirement.

State	Legal minimum working age, compulsory school age and type of work	Determination as to highest applicable requirement
NSW	No legal minimum age for casual work. Students must complete year 10 and/or be 17 years of age before they can leave school and undertake a full-time apprenticeship or traineeship, <u>unless an exemption applies. References</u>	Must not employ under 15 unless in light work and the work doesn't interfere with schooling. Must be in compulsory formal education until completed year 10 or be aged 17 to undertake an approved apprenticeship or traineeship. Must not work in hazardous or heavy work outside an approved apprenticeship or traineeship.
ACT	In the ACT a child is a person who is under 12. A young person is between 12 and 18 years of age. No legal minimum age for work. If under 15, employment of a child needs to comply with the Standards and work must only be 'light work' as defined, with written parental consent. Children under 15 must not be employed in High Risk work without a permit. Minimum age to start an apprenticeship is 15. Child or young person under 15 may be employed in a family business for up to 10 hours per week in 'light work' <u>References</u>	Must not employ under 15 unless in light work and the work doesn't interfere with schooling. Must be in compulsory formal education until 15. Must not work in hazardous or heavy work outside an approved apprenticeship or traineeship.

NT	An individual must not work unless 15 years of age. There are specific limitations about the hours of work the child can perform. The child must have finished year 10 successfully if working during a time of the school day when the child is required to attend school. References	Must not employ under 15 unless in light work and the work doesn't interfere with schooling. Must be in compulsory formal education until completion of year 10. Must not work in hazardous or heavy work outside an approved apprenticeship or traineeship.
Vic	For simple delivery roles must be at least 11 years old. A child employment permit must be obtained to work in casual or part-time jobs from age 13. No minimum working age for children working in a family business. Otherwise minimum employment age is 15. Minimum school leaving age is 17 unless the child has finished year 10 and undertakes education, training or employment for at least 25 hours per week . References	Must not employ under 15 unless in light work and the work doesn't interfere with schooling. Must be in compulsory formal education until 17 unless the child has completed year 10 and undertakes education, training or employment for at least 25 hours per week. Must not work in hazardous or heavy work outside an approved apprenticeship or traineeship.
Qld	Simple delivery roles must be at least 11 years old. General age for starting work is 13 years old. Restrictions apply to maximum hours of work for school aged children. The requirements for full time work is having completed year 10 or being 16 years old. References	Must not employ under 15 unless in light work and the work doesn't interfere with schooling. Must be in compulsory formal education until completion of year 10 or age 16. Must not work in hazardous or heavy work outside an approved apprenticeship or traineeship.
Tas	There is no minimum age for casual or part time work. Young people need to stay in education until they finish year 12, or receive a Certificate III, or reach the new minimum leaving age of 18. References	Must not employ under 15 unless in light work and the work doesn't interfere with schooling. Must be in compulsory formal education until completion of year 12, receive a Certificate III or reach age 18. Must not work

SA	There is no minimum age for casual or part-time employees outside of school hours. It is unlawful to employ a child of compulsory school age. Children must attend school until they turn 17 unless they achieve their SACE or other qualification, or are in full-time employment. Full-time employment is: • They have turned 15 and are employed full time (at least 30 hours per week) with an exemption from their school; • Are 16 and are working a minimum of 25 hours per week References	in hazardous or heavy work outside an approved apprenticeship or traineeship. Must not employ under 15 unless in light work and the work doesn't interfere with schooling. Must be in compulsory formal education until completion of SACE or aged 17 or are in full-time employment. Full-time employment is: • They have turned 15 and are employed full time (at least 30 hours per week) with an exemption from their school; • Are 16 and are working a minimum of 25 hours per week Must not work in hazardous or heavy work outside an approved apprenticeship or traineeship.
WA	Simple delivery roles are possible from ages 10-12, supervised by a parent and with written permission. Can only work under 15 with a parent's written permission in roles such as delivery, working in a shop or restaurant or collecting shopping trolleys, as long as written permission has been granted by a parent and the job is outside school hours. From age 15, written permission is not required. Children from any age can work in a family business. Reference. A child must attend school until the end of the year in	Must not employ under 15 unless in light work and with parent's written consent in defined roles, and the work doesn't interfere with schooling. Must be in compulsory formal education until completion of the year in which the child reaches 17 years 6 months or turns 18, whichever happens first. Student in year 10, 11 or 12 can be engaged in full-time work with the permission of the Minister of

	which the child reaches 17 years 6 months or turns 18, whichever happens first. Reference. A student in year 10, 11 or 12 can be engaged in full-time work with the permission of the Minister for Education. The minimum age for an exemption is 15 years and 6 months. Reference.	Education. Minimum age for exemption is 15 years 6 months. Must not work in hazardous or heavy work outside an approved apprenticeship or traineeship.
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Forced Labour

Requirement	Questions and additional Requirements	Answer and evidence
7.3 The organization shall eliminate all forms of forced and compulsory labour.	a) Does your organization comply with Clause 7.3? If yes, continue at c).	☒ Yes, I comply with the applicable state and territory legislation that addresses this FSC core labour requirement. ☐ No, see b)
7.3.1 Employment relationships are voluntary and based on mutual consent, without the threat of a penalty.	b) If the answer is no to a) above, please describe how or why your organization does not comply with Clause 7.3?	
7.3.2 There is no evidence of any practices indicative of forced or compulsory labour, including, but not limited to, the following: • physical and sexual violence • bonded labour • withholding of wages /including payment of employment fees and or payment of deposit to commence employment • restriction of mobility/movement • retention of passport and identity documents • threats of denunciation to the authorities.	c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies Clause 7.3?	I can demonstrate this compliance in the following ways: ☒ We have a policy on the prohibition of forced labor, which demonstrates that we meet this FSC core labour requirement. ☒ Our Employment offer letters/work agreements/contracts demonstrate that employees can leave upon notice to the employer and therefore we meet this FSC core labour requirement. ☐ Other:
	d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.3.	☐ Other: Documents, records or policies, etc. that show compliance with this FSC core labour requirement are as follows: ☒ Policy on the prohibition of forced labor ☒ Employment offer letters/work agreements/contracts



		☐ Other/further details
	e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.3. Please describe them, and how they impact your ability to comply with Clause 7.3.	
	f) Attach a policy statement, or statements, made by your organization that encompasses Clause 7.3.	☐ See attached policies, statements, etc. ☒ See online public policies at: https://jimpetail.com.au/sustainability ☐ Other:

Discrimination in Employment and Occupation

Equal opportunity and anti-discrimination legislation exists in every jurisdiction in Australia to provide fundamental legal protections. In addition, the Fair Work Act 2009 provides general protections and adverse action.

Despite these legal protections, there are various forms of discrimination in employment and occupation regularly mooted in the public domain and litigated in all realms of discrimination. Of particular risk are:

- Discrimination against women and in particular the gender pay gap between women and men and on the grounds of family responsibilities and pregnancy
- Discrimination against minority groups
- Discrimination against Indigenous peoples
- Disability discrimination

Requirement	Questions and additional Requirements	Answer and evidence
7.4 The organization shall ensure that there is no discrimination in employment and occupation. 7.4.1 Employment and occupation practices are non-discriminatory.	a) Does your organization comply with Clause 7.4? If yes, continue at c).	☒ Yes, I comply with the applicable state and territory legislation that addresses this FSC core labour requirement. ☐ No, see b)
	b) If the answer is no to a) above, please describe how or why your organization does not comply with Clause 7.4.	
	c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.4.	I can demonstrate this compliance in the following ways: ☒ We have an equal opportunity policy, which demonstrates that we meet this FSC core labour requirement.



		☒ Our employment offer letters/work agreements/contracts include an equal opportunity statement, which demonstrates that we meet this FSC core labour requirement. ☒ Our job announcements have an equal opportunity statement, which demonstrates that we meet this FSC core labour requirement. ☐ Other: _____ Documents, records or policies, etc. that show compliance with this FSC core labour requirement are as follows: ☒ Equal opportunity policy ☒ Employment offer letters/work agreements/contracts ☒ Job advertisements ☐ Other/further details: _____
	d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.4.	
	e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.4. Please describe them, and how they impact your ability to comply with Clause 7.4.	
	f) Attach a policy statement, or statements, made by your organization that encompasses Clause 7.4.	☐ See attached policies, statements, etc. ☒ See online public policies at: https://jimpetail.com.au/sustainability ☐ Other: _____

Freedom of Association and the Right to Collective Bargaining

Part 3-1 of the [Fair Work Act 2009](#) provides very detailed provisions in relation to the right to collective bargaining and freedom of association and all employees must be provided with the Fair Work Information Statement as gazetted at the commencement of their employment advising them of their rights in accordance with Section 124.

Division 8 details the Fair Work Commission's role in facilitating good faith bargaining requirements as the oversight to ensure that workers and employers bargain fairly. Rights are enshrined in Federal Legislation. The Act supports the FSC requirements.

However, the Fair Work Commission finds breaches of these provisions regularly, both by employers and employees. As a result, enquiries should be made as to internal practices and processes to ensure the law and therefore FSC requirements are complied with.

Requirement	Questions and additional Requirements	Answer and evidence
7.5 The organization shall respect freedom of association and the effective right to collective bargaining.	a) Does your organization comply with Clause 7.5? If yes, continue at c).	☒ Yes, I comply with the applicable state and territory legislation that addresses this FSC core labour requirement. ☐ No, see b)
7.5.1 Workers are able to establish or join worker organizations of their own choosing.	b) If the answer is no to a) above, please describe how or why your organization does not comply with Clause 7.5.	
7.5.2 The organization respects the full freedom of workers' organizations to draw up their constitutions and rules.	c) For the individuals employed by you at the site/sites holding the certificate, describe how your	I can demonstrate this compliance in the following ways: ☒ We have organizational policies, which demonstrates that we meet this FSC core labour requirement.



7.5.3 The organization respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.	organization knows it complies with Clause 7.5.	☒ Our Collective bargaining agreement demonstrates that we meet this FSC core labour requirement. ☒ We have minutes or documents from meetings related to the development of the collective bargaining agreement. ☒ We have documented evidence and records of the workers' representative(s) elections ☐ Other: _____
7.5.4 The organization negotiates with lawfully established workers' organizations and/ or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.	d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.5.	Documents, records or policies, etc. that show compliance with this FSC core labour requirement are as follows: ☒ Organizational policies ☒ Collective bargaining agreement ☒ Minutes or documents from meetings related to the development of the collective bargaining agreement ☒ Documented evidence and records of the workers' representative(s) elections ☐ Other/further details _____
7.5.5 Collective bargaining agreements are implemented where they exist.	e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.5. Please describe them, and how they impact your ability to comply with Clause 7.5.	_____
	f) Attach a policy statement, or statements, made by your organization that encompasses Clause 7.5.	☐ See attached policies, statements, etc. ☒ See online public policies at: https://jimpetail.com.au/sustainability ☐ Other: _____

Examples of questions to answer in completing the self-assessment

FSC has provided the following open questions that may be helpful to the organization to take into consideration when completing the self-assessment. The questions are divided into four categories addressed by the FSC core labour requirements. The level of detail required will depend on the location of the organization's facility, including the organization's assessment of risk, and the labour environment. This list of questions is not exhaustive.

Category	Question
Child Labour	• What is the statutory, legal, or regulated minimum age at the place of your operations? • What measures have you taken to ensure that child labour is not used in your operations? • Do you register the age (birthday) of your workers and how do you verify that this is the actual age? Do you check the identification papers? • If there are legal or regulatory restriction which to your understanding would limit your ability to comply with the requirement, describe how you mitigate those limitations. • If you employ workers below the age of 18, describe what measures you have taken to ensure that they don't perform hazardous or heavy work. If there are a requirement for training and education, indicate supporting documents. • Is the employment of children between the age of 13 or 15 legally allowed? Do you employ children between that age? If yes on both accounts, specify measures you have taken to ensure that they only perform light work that is not harmful to their health or development and that allows them to work outside school hours only.
Forced Labour	• Describe your recruitment and contracting practices to show compliance with this principle. • Do you grant loans or salary/wage advances that would require a worker to extend his/her working beyond the legal or contractual agreements? If so, can you describe how you mitigate the risk of bonded labour in such a case? • How do you ensure that there are no employment fees deducted, or payments or deposits made to commence employment? • How do you ensure that the workers do not experience any form of mobility restriction?

	• How do you ensure that the workers have access to their passports and identification documents at all times while at the same time offering a safe place for storing the documents? • How do you ensure that there are no threats of denouncing workers to the authorities?
Discrimination	• How do you ensure that wages and other working conditions are non-discriminatory? • Is there gender/age ratio parity? • Do you have an ethnically diverse workforce? • Do you have policies about non-discrimination? • Do you ensure all employees have equal opportunity for promotion? • How do you ensure applicants have equal opportunity for employment? • If there are legal or regulatory restriction which to your understanding would limit your ability to comply with these requirements, describe how you mitigate these restrictions?
Freedom of Association and the Right to Collective Bargaining	• Are workers organised into a trade union? To the best of your knowledge, describe why you believe the workers have or have not chosen to be represented by a trade union. • If workers are represented by a union, is the union autonomous and independent? • What forms of worker representation other than unions exist at the site? • Are there collective bargaining agreements in place that cover workers, and if so, how do you ensure compliance with such agreements?