



# FSC® INTERNATIONAL STANDARD

General requirements for FSC accredited certification bodies FSC-STD-20-001 V4-0 EN



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#### GENERAL REQUIREMENTS FOR FSC ACCREDITED CERTIFICATION BODIES

FSC-STD-20-001 V4-0 EN

## DRAFT 1-0

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

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

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## **Color key for Drafts**

Black: Old FSC standard wording

Purple: New FSC standard wording

Only content changes or additions are marked as new FSC standard wording (minor editorial changes are not indicated).

Green: DIN EN ISO/IEC 17065:2013-01 wording

NEW= new ISO clause

AMENDED= amended ISO clause

Pink: DIN EN ISO/IEC 17021:2011-07 wording
Blue: DIN EN ISO/IEC 17024:2012-11 wording

## A Objective

This standard specifies the accreditation requirements for all certification bodies operating FSC certification programs. The objective of this standard is to ensure that these programs are managed in a competent, consistent, impartial, transparent, rigorous, reliable and credible manner, thereby facilitating their acceptance on a national and international basis and so furthering international trade and promoting sustainable development.

This standard aims to ensure conformity with applicable requirements of the *ISEAL Code of Good Practice for Assuring Compliance with Social and Environmental Standards V1-0* and compatibility with *DIN EN ISO/IEC standard 17065:2013-01 Conformity assessment – requirements for bodies certifying products, processes and services.* 

#### Stakeholder consultation note (for information):

At its 64th meeting in November 2013, the FSC Board decided to formally de-link FSC-STD-20-001 from ISO standards and therefore to not anymore require certification bodies to be in conformity with ISO 17065, the standard that replaced ISO Guide 65:1996. As a result of this, certification bodies will only need to conform with FSC-STD-20-001, rather than having to additionally conform with ISO 17065.

The revised standard contains a set of FSC specific requirements, but has been complemented with additional requirements from ISO 17065, with the aim to ensure compatibility with ISO 17065. Other ISO standards, such as ISO 17021 and ISO 17024 were also considered in the drafting process. This was done to ensure conformity with the ISEAL Assurance Code, which requires FSC standards to conform or be equivalent to ISO 17065 or ISO 17021.

ISEAL allows that alternative assurance management systems can be designed, where ISO norms would hinder the objectives of the standards systems by restricting practices used. Such alternative mechanisms still need to fulfill the intent of the assurance principles as defined by ISEAL.

The draft requirements are presented indicating the source of origin, by using different colors as presented above.

#### B Scope

This standard is for use by all certification bodies operating programs for the FSC certification of forest management, chain of custody and controlled wood against FSC standards.

All aspects of this standard are considered to be normative, including the scope, standard effective date, references, terms and definitions, notes, tables and annexes, unless otherwise stated (e.g. as examples).

## C Effective and validity dates

Approval date tbd

Publication date Tentative date: 01 October 2015

Effective date 01 January 2016

Period of validity until 31 December 2021 (or until replaced or withdrawn)

## Stakeholder consultation note (proposal):

To allow certification bodies to adapt their systems to the new and amended requirements and train their personnel, a longer transition timeline is proposed to be granted. One year after the effective date ASI will start assessing certification bodies against the revised standard.

**New applicant certification bodies** that apply for accreditation after the effective date of this standard shall be audited against the requirements of this standard.

**Existing applicant certification bodies** in the process of accreditation at the effective date shall switch to the requirements of this standard before accreditation is granted.

**FSC accredited certification bodies** shall be in conformity with the requirements of this standard by 01 January 2017.

#### D References

The following referenced documents are relevant for the application of this document. For undated references, the latest edition of the referenced document (including any amendments) applies.

FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship

FSC-STD-01-002 FSC Glossary of terms

FSC-STD-01-003 SLIMF Eligibility Criteria

FSC-STD-20-002 Structure, content and local adaptation of Generic Forest Stewardship Standards

FSC-STD-20-006 Stakeholder consultation for forest evaluations

FSC-STD-20-007 Forest management evaluations

FSC-STD-20-011 Chain of Custody Evaluations

FSC-STD-20-012 Standard for Evaluation of FSC Controlled Wood in Forest Management Enterprises

FSC-PRO-01-017 Participation of external observers in on-site FSC certification audits and/ or ASI assessments

FSC-PRO-20-003 Transfer of FSC Certificates and License Agreements

ISEAL Code of Good Practice for Assuring Compliance with Social and Environmental Standards V1-0

ISO 9000:2005 Quality Management systems - Fundamentals and vocabulary

ISO/IEC 17000:2004 Conformity Assessment - Vocabulary and general principles

DIN EN ISO/IEC 17021:2011-07 Conformity assessment - Requirements for bodies providing audit and certification of management systems

DIN EN ISO/IEC 17024:2012-11 Conformity assessment – Requirements for bodies operating certification of persons

DIN EN ISO/IEC 17065:2013-01 Conformity assessment - Requirements for bodies certifying products, processes and services
ISO 19011:2011 Guidelines for auditing management systems
ISO/IEC Guide 2:2004 Standardization and related activities — General vocabulary
ISO/IEC Guide 60:2004 Code of good practice for conformity assessment

## **FSC** normative documents replaced by this version of the standard:

FSC-ADV-20-004 Qualifications of FSC certification body auditors FSC-ADV-20-481 Documenting the forest areas that the certification body has been contracted to evaluate for conformity with FSC standards

#### E Terms and definitions

For the purposes of this standard, the terms and definitions provided in *FSC-STD-01-002 FSC Glossary of Terms*, *ISO/IEC 17000:2004*, and the following apply:

**Appeal**: request by the client to the certification body for reconsideration of a decision it has made relating to that client.

**Application reviewer:** the person(s) who check(s) if an applicant for certification is ready and prepared for an audit. This person also selects the auditor and the audit team.

**Audit:** systematic, independent, documented process for obtaining records, statements of fact or other relevant information and assessing them objectively to determine the extent to which specified requirements are fulfilled (adapted from ISEAL Assurance Code).

**Auditor:** a person with competence necessary to conduct an evaluation.

**Audit team:** consists of a qualified lead auditor who is supported by other auditors, technical experts and/or further personnel (e.g. interpreter, local specialist) – if required by size or character of the audit evaluation.

**Certification**: third-party attestation related to products, processes, systems or persons.

**Certification decision**: granting, maintaining, renewing, expanding the scope of, reducing the scope of, suspending, reinstating, or withdrawing certification.

**Certification decision maker:** the person(s) who takes the final decision if an applicant is certified, an existing certificate is extended or a withdrawn certificate is re-issued.

**Client**: organization or person responsible to a certification body for ensuring that certification requirements are fulfilled. In the context of this standard client refers to applicants for FSC certification and to FSC certificate holders.

**Competence:** the demonstrated ability to apply knowledge, skills and personal attributes in order to achieve intended results (adapted from DIN EN ISO/IEC 17065:2013-01).

**Complaint**: expression of dissatisfaction by any person or organization presented to a certification body relating to the FSC activities of that certification body and/ or the activities of their clients (adapted from ISO/IEC 17011:2004 (E)). In the context of FSC, a complaint needs to include the name and contact information of the complainant, a clear description of the issue and evidence to support each element or aspect of the complaint.

**Conflict of interest:** an actual or perceived interest in an action that results in or has the appearance of resulting in personal, organisational, or professional gain (ISEAL Assurance Code).

NOTE: Categories of conflict of interest include for example evaluating one's own work (developing manuals, procedures and templates for certification clients), individual or organisational benefits or institutional financial benefits.

## Consultancy: participation in

- a) the designing, manufacturing, installing maintaining or distributing of a certified product or a product to be certified; or
- b) designing, implementing, operating or maintaining of a certified process or a process to be certified; or
- c) the designing, implementing, providing or maintaining of a certified service or a service to be certified; or
- d) the designing, implementing or maintaining of a certified management system or a management system to be certified.
- NOTE 1: Arranging training and participating as a trainer is not considered consultancy, provided that, where the course relates to management systems or auditing, it is confined to the provision of generic information that is freely available in the public domain; i.e. the trainer should not provide company-specific solutions.
- NOTE 2: The certification body is allowed to explain its findings and/or clarify the requirements of normative documents but shall not give prescriptive advice or consultancy as part of an audit.

**Days:** timelines mentioned in this standard in days refer to calendar days unless otherwise specified.

**Evaluation**: the combined processes of audit, review, and decision on a client's conformity with the requirements of a standard (ISEAL Assurance Code).

## Types of evaluation:

**Pre-Evaluation:** assessment to determine the applicant's readiness for their main evaluation.

Main Evaluation: assessment of an applicant for FSC certification.

**Re-Evaluation:** assessment for re-certification. **Surveillance Evaluations:** see "surveillance"

**FSC:** if used in this standard without any further designation such as "IC" or "GD", it is used as a general term referring to all operational entities under the ownership of Forest Stewardship Council A.C, excluding Accreditation Services International (ASI).

**FSC Accreditation Requirements:** all normative rules and regulations applicable to FSC accredited certification bodies and to applicant certification bodies.

**FSC Certification Requirements**: all normative rules and regulations applicable to the certification of forest management enterprises and/or of forest products enterprises.

FSC Normative Framework: the collection of FSC Policies, Standards, and Procedures which are mandatory for FSC accredited certification bodies, certificate holders, and

applicants (and any other party as specified in a document's scope) to be followed. Includes Advice Notes where these exist (stand-alone or compiled in Directives).

**Impartiality:** actual and perceived presence of objectivity.

- NOTE 1: Objectivity means that conflicts of interest do not exist or are resolved so as not to adversely influence subsequent activities of the certification body.
- NOTE 2: Other terms that are useful in conveying the element of impartiality are: objectivity, independence, freedom from conflict of interests, freedom from bias, lack of prejudice, neutrality, fairness, open-mindedness, even-handedness, detachment, balance.

**Lead auditor:** a person with competence necessary to conduct an evaluation and to be the content leader of the audit team.

**License Agreement for the FSC Certification Scheme**: an agreement, that each applicant for FSC certification and/or FSC certificate holder has to enter into with FSC Global Development, in order to be eligible for FSC certification. The License Agreement for the FSC Certification Scheme authorizes the use of the FSC trademarks under specified terms and provisions.

**Operational procedure:** describes the processes used to effectively meet the objective of the activity (e.g. who, what, when, where, why).

Outsourcing: (see Subcontractor).

**Peer reviewer:** an internal or external auditor reviewing an audit report provided by the lead auditor.

**Qualification:** an education that is concluded by examination(s) in order to earn a degree (i.e. bachelor or master degree at university).

**Subcontractor**: a separate legal entity, including sister companies, subsidiaries and any companies linked by ownership to the certification body, with which the certification body has signed a contract to provide FSC accredited certification services to their clients.

NOTE: Persons working under an individual contract or formal agreement for the certification body that places them under the authority and direct control of the certification body are not deemed to be subcontractors.

**Surveillance**: systematic iteration of conformity assessment activities as a basis for maintaining the validity of FSC certification.

**Suspension**: temporary invalidation of the FSC certification for all or part of the specified scope of attestation.

**Team leader:** the person who manages and coordinates an audit team.

NOTE: A team leader does not need to be an auditor.

**Technical expert:** a person with specific knowledge or expertise on social, environmental or economic issues related to FSC's Principles and Criteria and/ or knowledge of critical characteristics of operational processes for audits in chain of custody.

NOTE: Technical experts do not need to be auditors.

**Termination**: revocation or cancellation of the certification agreement by the certification body or the client according to contractual arrangements.

Withdrawal: revocation or cancellation of the FSC certification.

#### Verbal forms for the expression of provisions

[Adapted from ISO/IEC Directives Part 2: Rules for the structure and drafting of International Standards]

"shall": indicates requirements strictly to be followed in order to conform with the standard.

"should": indicates that among several possibilities one is recommended as particularly suitable, without mentioning or excluding others, or that a certain course of action is preferred but not necessarily required. A certification body can meet these requirements in an equivalent way provided this can be demonstrated and justified.

"may": indicates a course of action permissible within the limits of the document.

"can": is used for statements of possibility and capability, whether material, physical or causal.

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## F FSC Accreditation Standards Map

Accreditation Scope		Forest management	Chain of Custody	
Mandatory combination		Chain of Custody		
Accreditation standards	G	FSC – STD – 20 – 001 General requirements for CBs		
	S	FSC-STD-20-002 Adaptation Generic FSS		
		FSC-STD-20-006 Stakeholder consultation for forest evaluations	FSC-STD-20-011 COC evaluations	
		FSC-STD-20-007 FM evaluations		
		FSC-STD-20-012 Evaluation of FSC CW		
Certification standards	G	FSC-STD-01-001 FSC Principles and Criteria  FSC-STD-30-010 FM requirements for CW	FSC-STD-40-004 COC certification	
		certification		
			FSC-STD-40-005 Sourcing Controlled Wood	
	S	FSC-STD-30-005 Group entities in FM Groups	FSC-STD-40-003 COC certification of multiple sites	
			FSC-STD-40-006 Project certification	
			FSC-STD-40-007 Sourcing Reclaimed Material	

G= Generic requirements, S= Scope-specific requirements

This table provides an overview of the main accreditation and certification standards for the two (2) available scopes of FSC accreditation. All documents of the FSC normative framework are listed in the FSC document catalogue and are published on the FSC website.

## Part 1: General requirements

## 1.1 Accreditation scope

- 1.1.1 The certification body shall define the scope of FSC accreditation based on the following two (2) options:
  - a) the accreditation scope includes forest management and chain of custody certification; or
  - b) the accreditation scope includes chain of custody certification only.
  - NOTE: Scope a) does include controlled wood forest management <u>and</u> controlled wood chain of custody; scope b) does include controlled wood chain of custody.

## Stakeholder consultation note (proposal):

The current accreditation scope includes three categories: forest management (FM), controlled wood forest management (CW-FM) and chain of custody (COC). It is proposed to limit the accreditation scope to FM and COC, with CW being an integral part of both FM (for CW-FM) and COC (CW-COC).

If a certification body chooses FM it is mandatory to also include COC and therefore offer the full scope. The certification body can choose to only offer COC accreditation services.

- 1.1.2 The certification body shall conduct its certification operations according to their defined scope and in conformity with:
  - a) the requirements specified in this standard;
  - b) the requirements of all applicable documents of the FSC normative framework as published on the FSC website (<u>ic.fsc.org</u>);
  - c) its operational procedures and instructions.

## 1.2 Legal and contractual matters

## 1.2.1 Legal entity

- 1.2.1.1 The certification body shall be a legal entity, or a defined part of a legal entity, such that the legal entity can be held legally responsible for all its certification activities.
- 1.2.1.2 The certification body shall define the entity (person(s), group or committee) that is responsible for making certification decisions (hereafter referred to as the certification decision making entity).
  - NOTE: Certification decisions include decisions to grant, maintain, renew, suspend, reinstate or withdraw certification as well as decisions on expanding or reducing the scope of certification.

#### 1.2.2 Certification agreement

1.2.2.1 The certification body shall ensure that a legally enforceable certification agreement is signed by the relevant parties prior to the main evaluation and after the client has obtained a 'License Agreement for the FSC Certification Scheme' (see Clause 4.1.6).

- 1.2.2.2The certification body shall ensure that its certification agreement requires the client at least to:
  - a) conform with all applicable certification requirements;
  - close-out all preconditions, conditions and corrective actions requested by the certification body for issuing or maintaining a certificate;
  - c) agree that the certification body has the right to suspend and/ or withdraw its certification with immediate effect if, in the sole opinion of the certification body, the client is not in conformity with the conditions specified for the maintenance of the certificate.
  - d) agree to the inclusion of a clause in reference to Clause 1.6.3.
  - e) make all necessary arrangements for:
    - i. conducting evaluations at the required intervals, including the certification body's right to carry out unannounced or short notice audits, provisions ensuring the right of the certification body, FSC and ASI to examine documentation and information deemed necessary, and access to the relevant equipment, location(s), area(s), personnel, and client's subcontractors;
    - ii. investigating complaints;
    - iii the participation of observers as specified in FSC-PRO-01-017.
  - making claims regarding certification consistent with the scope of certification and not making any claims of conformity (or near conformity) with FSC requirements until and unless a certificate is awarded;
  - g) not using its certification in such a manner as to bring the certification body into disrepute and not making any statement regarding its certification that the certification body may consider misleading or unauthorized;
  - h) meeting the following obligations on suspension or withdrawal of the certificate:
    - i. immediately cease to make any use of any FSC trademarks, or to sell any products previously labeled or marked using the FSC trademarks, or to make any claims that imply that they conform with the requirements for certification;
    - ii. identify all relevant existing customers, and advise those customers of the suspension or withdrawal in writing within three (3) business days of the suspension or withdrawal, and maintain records of that advice;
    - NOTE: Certified and uncertified clients are considered "relevant" customers, if they bought certified material, or placed an order or submitted an enquiry for certified products, or otherwise expressed an interest in purchasing certified products.
    - iii. cooperate with the certification body and with FSC in order to allow the certification body or FSC to confirm that these obligations have been met.
  - i) meeting the following additional obligations on withdrawal of the certificate:

- i. return the certificate to the certification body or destroy the original, and commit to destroy any electronic copies and printed copies in their possession;
- ii. at its own expense remove all uses of FSC's name, initials, logo, certification mark or trademarks from its products, documents, advertising or marketing materials.
- j) agree that in case of reduction, suspension or withdrawal of the scope of certification body's FSC accreditation, the certificates of the affected clients will be suspended ipso facto within six (6) months after the date of reduction, suspension or withdrawal of the respective scope of FSC accreditation. The client shall be informed within thirty (30) days after the reduction, suspension or withdrawal of the scope of FSC accreditation that the accreditation of the certification body has been reduced, suspended or withdrawn. The clients shall be informed that they have to seek a new FSC accredited certification body within six (6) months to keep their certificate valid;
- k) provide printed copies or electronic copies of the certificate in its entirety, if copies are provided to others (NEW);
- conform with the requirements as specified by FSC in making reference to its certification to FSC standards in communication media such as documents, brochures or advertising;
- m) conform with any requirements for the use of the FSC trademarks;
- n) ensuring the right to use information which is brought to the attention of the certification body to follow up on infringements of the FSC trademarks and of the intellectual property rights held by FSC;
- o) ensuring that the client acknowledges the title of the FSC's intellectual property rights and that FSC retains full ownership of the intellectual property rights and that nothing shall be deemed to constitute a right for the client to use or cause to be used any of the intellectual property rights;
- p) keep a record of all complaints made known to it relating to conformity with certification requirements and makes these records available to the certification body when requested, and:
  - i. take appropriate action with respect to such complaints and any deficiencies found in products that affect conformity with the requirements for certification;
  - ii. document the actions taken.
- q) inform the certification body, without delay, of changes in the ownership, structure of the organization, management systems or circumstances which relate to the implementation of FSC certification requirements.
- NOTE 1: Examples of changes can include the legal, commercial, organizational status or ownership, organization and management (e.g. key managerial or decision-making staff or FSC manager or contact person), contact address and production sites, major changes to the certified management system.
- NOTE 2: Examples of circumstances relating to the implementation of FSC certification requirements are e.g. armed conflicts or epidemics.

1.2.2.3 The certification agreement shall cite the relevant FSC normative documents and rules and regulations in its most recent version.

#### 1.2.3 Use of certificates and FSC trademarks

## **Stakeholder consultation note (for information):**

The General Assembly 2014 Motion 29 "The Logo Motion" requests "to redefine the FSC trademark standards in order to facilitate larger use of the FSC trademark on conforming products and in off-product promotional uses. This includes both simplification of requirements for trademark use and of approval procedures, but it excludes changes to current art work that would impact trademark registration."

FSC will seek guidance on the interpretation of Motion 29 from the FSC Board and will subsequently start review and revision processes of the trademark standards FSC-STD-50-001 and FSC-STD-50-002 in 2015, incorporating Motion 29. If needed, requirements of FSC-STD-20-001 will be adapted as a result of these processes.

- 1.2.3.1 The certification body shall conform with the requirements of all applicable FSC trademark requirements and any other requirements relating to the intellectual property of the Forest Stewardship Council A.C.
- 1.2.3.2 The certification body shall be responsible for the approval of the FSC trademark use of their clients, both on-product and promotional uses.
- 1.2.3.3 The certification body shall control the FSC trademark use of their clients, both onproduct and promotional uses by:
  - a) auditing the trademark use at minimum at the time of the annual surveillance audit and re-evaluations (sampling can be applied); and
  - b) addressing cases of detected or reported trademark misuses by their clients.
- 1.2.3.4 Incorrect references to the certification scheme, or misleading use of certificates, FSC trademarks, or any other mechanism for indicating a product is certified, found in documentation or other publicity, shall be dealt with by suitable action.
- 1.2.3.5 The certification body shall not promote standards of other forestry conformity assessment schemes as equivalent to FSC standards.
  - NOTE: If a certification body offers certification services of other forestry conformity assessment schemes, the FSC system and standards shall clearly and accurately be differentiated relative to the other schemes in promotional media and communication to clients according to specific information as provided by FSC.
- 1.3 Granting, maintaining, extending, reducing, suspending, withdrawing and reinstating certification

## **Granting certification**

- 1.3.1 The certification body shall only issue (or re-issue) a certificate when their client has:
  - a) entered into and holds a valid 'License Agreement for the FSC Certification Scheme', which is not suspended;

- b) conforms with the requirements of all applicable standards and normative FSC documents, including the full implementation of any actions required to correct major nonconformities that were identified prior to the issue of the certificate;
- c) signed a certification agreement.
- 1.3.2 The period of validity of an FSC certificate shall not exceed five (5) years.
- 1.3.3 The certificate may be re-issued as the result of a re-evaluation.
- 1.3.4 The specified period of validity of a certificate may be extended for a single exceptional extension of up to six (6) months in order to permit re-evaluation to be completed, when justified by circumstances beyond the control of the certification body *and* their client. The following steps shall be taken:
  - a) the certification body shall record such circumstances;
  - b) inform ASI of the extended expiry date of the certificate within ten (10) business days of the extension being granted;
  - c) update the entry in the FSC database of registered certificates (<u>info.fsc.org</u>).
  - NOTE 1: Problems in planning or scheduling an audit shall not be considered a justifiable circumstance for an extension *per se*.
  - NOTE 2: This clause does not apply in the context of chain of custody project certification.

## **Maintaining certification**

- 1.3.5 The conditions necessary for a client to maintain a certificate shall include that the client:
  - a) conforms and continues to conform with all the certification body's conditions for maintaining the certificate;
  - b) conforms with all the certification body's and FSC's requirements regarding claims, logos, certification marks or trademarks;
  - c) corrects any nonconformities with the applicable standard(s) within the maximum period specified by the certification body;
  - d) continues to pay all specified fees and costs in a timely manner;
  - e) undergoes surveillance as determined by the certification body and as required by FSC;
  - f) holds a valid 'License Agreement for the FSC Certification Scheme', which is not suspended.

#### Extending and reducing the scope of certification

NOTE: a change of scope may be necessary as a result of changes in ownership, structure of the organization or management systems (see Clause 1.2.2.2.q, above).

- 1.3.6 The conditions necessary for the certification body to grant or conduct a change of scope<sup>1</sup> of a certificate shall include the following requirements:
  - a) the change of scope shall not include or result in an extension of the certificate's expiry date beyond the time period for which it was originally issued;
  - b) if granting a change of scope, the certification body shall review the wording of the certificate previously issued and if necessary shall require that the old certificate be returned to the certification body or destroyed by the client, and in that event a new certificate shall be issued with revised wording reflecting the change of scope.

## Suspending and withdrawing certification

- 1.3.7 In the event that the certification body suspends or withdraws a certificate, the certification body shall update the status of the certificate in the FSC database of registered certificates (<u>info.fsc.org</u>) together with the effective date and reason of suspension or withdrawal within three (3) business days of the suspension or withdrawal.
- 1.3.8 The person(s) communicating the suspension of certificates to clients shall be competent in their knowledge and understanding of all aspects of handling of suspended certifications (see Section 3.1) (NEW).

## Stakeholder consultation note (for information):

Clauses 1.3.9 and 1.3.10 (below) are taken from the standard for COC evaluations FSC-STD-20-011 to be generically applicable.

- 1.3.9 The certification body shall issue a letter of notification to clients with certificates that have been suspended or withdrawn. The notification letter shall include:
  - a) a clear statement about the invalid status of the certificate (suspended, or withdrawn);
  - b) the date from which the invalid status of the certificate is official;
  - c) the rationale supporting the invalid status of the certificate which shall include, but is not limited to, the details of the breach of the certification agreement and the demonstration of nonconformities with the applicable certification requirements;
  - d) the requirement to withdraw all uses of the FSC trademarks;
  - e) in the case of an suspended or withdrawn FSC controlled wood certification, the requirement to stop making FSC Controlled Wood claims and/or using controlled material in any FSC products;
  - f) in the case of suspended certificates, the information that the maximum duration of suspension is twelve (12) months and after this period, the certificate will be withdrawn;

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<sup>&</sup>lt;sup>1</sup> An increase or decrease in the Participating Sites of a group certificate is not considered a change of scope unless, in the opinion of the certification body, the change requires significant changes to the group certificate holder's management systems.

- g) a statement requiring the client to acknowledge receipt of the letter of notification in writing.
- 1.3.10 The certification body shall keep the evidence that the client has received the letter of notification (e.g. client's written acknowledgement of receipt, delivery receipt from the mail service).

## Reinstating certification

- 1.3.11 The certification body may reinstate the certificate after suspension if all conditions as specified in Clause 1.2.2.2.h) are met.
- 1.3.12 If a certificate is reinstated after suspension, the certification body shall make all necessary modifications to formal certification documents, public information, authorizations for use of marks, etc., in order to ensure all appropriate indications exist that the product continues to be certified. If a decision to reduce the scope of certification is made as a condition of reinstatement, the certification body shall make all necessary modifications to formal certification documents, public information, authorizations for use of marks, etc., in order to ensure the reduced scope of certification is clearly communicated to the client and clearly specified in certification documentation and public information (NEW).

## 1.4 Impartiality

- 1.4.1 The certification body shall be responsible for ensuring that certification activities are undertaken impartially and shall not allow commercial, financial or other pressures to compromise impartiality (AMENDED).
- 1.4.2 The certification body shall have top management commitment to impartiality (NEW).
- 1.4.3 All certification body personnel (either internal or external), or committees who are involved in certification activities, as well as members of the certification decision making entity, shall act impartially (NEW).
- 1.4.4 The certification body and any part of the same legal entity and entities under its organizational control or controlling it shall not offer or provide consultancy to its clients (AMENDED).

## Stakeholder consultation note (proposal):

The current FSC-STD-20-001 standard, ISO 17065 and ISO 17021 do not allow certification bodies or any part of the same legal entity to provide consultancy services to clients. While this is a fundamental principle of impartiality to not assess one's own work, it can be seen as a limiting factor for e.g. small and low intensity managed forest (SLIMF) operations.

For the purpose of this consultation the Accreditation standard Working Group agreed to consult stakeholders whether consultancy services of certification bodies should be allowed for SLIMF operations and community forests even if this means not achieving compatibility with ISO requirements.

Do you agree that certification bodies (the same legal entity) should be allowed to provide consultancy services to small operations such as SLIMFs (e.g. tailored trainings), or in the context of the Modular Approach Program (MAP), that offers a step-wise approach to FSC forest management certification? Please explain your position.

1.4.5 The certification body shall have, maintain and implement written policy and procedures for avoidance of conflicts of interest. These procedures shall include:

- a) the contractual obligation for all personnel contributing to certification decisions, to disclose in writing to the certification body all possible and actual conflicts of interest, at the time that the conflict or possibility of conflict becomes evident;
- b) documented procedures for determining timely and appropriate responses to such declarations of conflict of interest as they arise, to ensure that the declared interests neither influence, nor are perceived to influence, the decisions of the certification body;
- c) the maintenance of records of:
  - i. all declarations of potential conflicts of interest;
  - ii. every action which has been taken to resolve the possibility and actual occurrence of conflicts of interest.
- 1.4.6 The certification body shall identify, analyse and document risks to its impartiality on an ongoing basis. This shall include those risks that arise from its activities, from its relationships, or from the relationships of its personnel. However, such relationships may not necessarily present a certification body with a risk to impartiality (NEW).
  - NOTE: A relationship presenting a risk to impartiality of the certification body can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing (including branding), and payment of a sales commission or other inducement for the referral of new clients, etc.

## Stakeholder consultation note (proposal):

Based on the above requirement the certification body would need to determine whether a conflict of interest potentially exists and how it is addressed. FSC has published a standard interpretation which specifies that "FSC does not consider it a conflict of interest, if an FSC accredited certification body is also servicing their FSC-certified clients as Monitoring Organisation (MO) in the context of the European Timber Regulation (EUTR), as this service does not cover compliance elements of the FSC standards". Specifically, the certification body may develop a Due Diligence System (DDS), but FSC does not require the certification body to evaluate the DDS.

This issue has been controversially discussed at the Working Group level, as it is argued that the concept of a MO potentially creates conflicts of interest, but also that it may be in the interest of FSC to allow MOs.

PSU suggests keeping the EUTR case-specific standard interpretation.

- 1.4.7 If a risk to impartiality is identified, the certification body shall be able to demonstrate how it eliminates or minimizes such risk. This information shall be made available to the committee specified in Clause 1.4.13 (AMENDED).
  - NOTE: Risks may also arise from actions of other persons, bodies or organizations. (NEW).
- 1.4.8 The certification body shall ensure that activities of separate legal entities, with which the certification body or the legal entity of which it forms a part has relationships, do not compromise the impartiality of its certification activities (AMENDED).
- 1.4.9 When a separate legal entity as mentioned in Clause 1.4.8 offers or provides consultancy, the certification body's management personnel and personnel in the

review and certification decision-making process shall not be involved in the activities of the separate legal entity. The personnel of the separate legal entity shall not be involved in the management of the certification body, the review, or the certification decision (NEW).

- 1.4.10 The certification body's activities shall not be marketed or offered as linked with the activities of an organization that provides consultancy. A certification body shall not state or imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organization were used (NEW).
- 1.4.11 Within a period specified by the certification body, personnel shall not be used to review or make a certification decision for a product for which they have provided consultancy (AMENDED).
  - NOTE 1: A conflict of interest can be considered lapsed after a minimum period of two (2) years following the end of the conflicting activity or relationship.
  - NOTE 2: For lead auditors and personnel involved in the certification decision-making process a minimum period of five (5) years is required before a conflict of interest can be considered lapsed.
- 1.4.12 The certification body shall have, maintain and implement an anti-corruption policy.

## Committee for safeguarding impartiality

- 1.4.13 The certification body shall have a committee for safeguarding its impartiality. The committee shall provide input on the following:
  - a) the policies and procedures relating to the impartiality of its certification activities (NEW);
  - b) any tendency on the part of a certification body to allow commercial or other considerations to prevent the consistent impartial provision of certification activities (NEW);
  - c) matters affecting impartiality and confidence in certification (NEW).
  - NOTE: The committee's functions do not need to be limited to those described here.

    Normally the oversight of independence will be only one of the committee's functions.
- 1.4.14 The committee's terms of reference shall be formally documented to ensure the following:
  - a) a balanced representation of significantly interested parties, such that no single interest predominates (internal or external personnel of the certification body are considered to be a single interest, and shall not predominate) (AMENDED);
  - NOTE: FSC membership or FSC chamber-balanced representation is not a precondition for the committee. Balanced representation may be achieved by participation of parties with a variety of expertise, providing economic, social and environmental perspectives.
  - b) access to all the information necessary to enable it to fulfil all its functions;

NOTE: This includes the documents mentioned in Clauses 1.4.5, 1.4.6, 1.4.7, 1.4.13, as well as other documents, such as relevant management reports and results of external assessments, where they exist.

- c) at least one (1) annual meeting;
- d) its independence of the financial control of the organisation;
- e) its independence of certification decision making;
- f) records of its discussions and recommendations;
- g) records of the certification body's response(s) to its discussions and recommendations.

## **Stakeholder consultation note (proposal):**

According to ISO 17065 it would be possible for FSC to implement one committee for the entire certification system, rather than each certification body operating its own committee. ASI could operate such a committee as an independent body for all certification bodies, offering a more cost effective way for certification bodies to implement the requirements for impartiality committees.

A chamber-balanced committee could be established with certification bodies' representation or with peer reviews done at certification body level.

This idea will be further developed and consulted directly with certification bodies at the next annual FSC – CB meeting in 2015. All stakeholders are invited to provide an initial response whether or not you generally support the idea to establish a centralized committee?

- 1.4.15 If the top management of the certification body does not follow the input of this committee, the committee shall have the right to take independent action (e.g. informing authorities, accreditation bodies, stakeholders). In taking appropriate action, the confidentiality requirements of Section 1.7 relating to the client and certification body shall be respected.
- 1.4.16 Input that is in conflict with the operating procedures of the certification body or other mandatory requirements should not be followed. Management should document the reasoning behind the decision to not follow the input and maintain the document for review by appropriate personnel (NEW).

#### 1.5 Liability and financing

- 1.5.1 The certification body shall be able to demonstrate that it has:
  - a) evaluated the risks arising from its certification activities, and
  - b) that it has adequate arrangements (e.g. insurance or reserves) to cover liabilities arising from its operations in each of its fields of activities and the geographic areas in which it operates.
- 1.5.2 The certification body shall have the financial stability and resources required for its operations according to the requirements of this standard.

## 1.6 Non-discriminatory conditions

- 1.6.1 The policies and procedures under which the certification body operates, and the administration of them, shall be non-discriminatory. Procedures shall not be used to impede or inhibit access by clients, other than as provided for in this standard.
- 1.6.2 Access to the certification process shall not be conditional upon the size of the client or membership of any association or group, nor shall certification be conditional upon the number of certifications already issued. There shall not be undue financial or other conditions.
- 1.6.3 Notwithstanding the requirements of Clauses 1.6.1 and 1.6.2 above the certification body shall not be obliged to enter into or maintain any commercial or other relationship with any entity or issue or maintain a certificate previously issued to any entity whose activities conflict with the obligations of the certification body as specified in its accreditation contract with ASI, or which, in the sole opinion of the certification body, reflect badly on the good name of the certification body.
  - NOTE: A certification body can deny certification to a client when fundamental/ demonstrated reasons exist, such as illegal activities, history of repeated nonconformities with certification requirements and similar issues.
- 1.6.4 The certification body shall confine its requirements, audit, review, decision and surveillance to those matters specifically related to the scope of certification.

## 1.7 Confidentiality

- 1.7.1 The certification body shall be responsible, through legally enforceable commitments, for the management of all information obtained or created during the performance of certification activities. Except for information that the client makes or is required to make publicly available, that FSC and ASI are entitled to access (see Clause 1.7.3), or when agreed between the certification body and the client (e.g. for the purpose of responding to complaints), all other information is considered proprietary information and shall be regarded as confidential (AMENDED).
- 1.7.2 The certification body shall have, maintain and implement written policies and procedures for maintenance of confidentiality, including:
  - a) a policy statement on confidentiality;
  - b) procedures for ensuring that personnel are aware of the policy and of their consequent obligations;
  - c) a written confidentiality agreement to be signed by all personnel who have access to confidential information. Such personnel shall include but is not limited to:
    - i. administrative staff;
  - ii. lead auditors, auditors, technical experts and audit observers;
  - iii. consultants and subcontractors;
  - iv. certification decision makers;
  - v. peer reviewers;

- vi. committee members.
- 1.7.3 The certification body shall have procedures in place that ensure that clients are fully informed of, and have contractually agreed in writing to:
  - a) FSC's and ASI's right of access to confidential information; and
  - b) FSC's requirements for specified information to be made public as a requirement of certification and as specified in the applicable FSC normative documents.
- 1.7.4 When the certification body is required by law or authorized by contractual arrangements to release confidential information, the client or person concerned shall, unless prohibited by law, be notified of the information provided (AMENDED).
- 1.7.5 Information about the client obtained from sources other than the client (e.g. from the complainant or from regulators) shall be treated as confidential, unless the source of information and the client give written consent to disclose the information (NEW).

## 1.8 Complaints and appeals

- 1.8.1 The certification body shall have a documented procedure to receive, evaluate and make decisions on complaints and appeals, which shall at least include the following elements:
  - a) to allow the aggrieved party the opportunity to present the complaint or appeal to an entity (person(s), group or committee) which must be within the certification body's contractual (e.g. employee) or organizational control (e.g. committee).
  - b) that requires the complainant or appellant to indicate what constitutes a complaint or appeal, including the name and contact information of the submitter, a clear description of the issue and evidence to support each element or aspect of the complaint or appeal.
- 1.8.2 Summary information about the procedures for submitting and handling complaints and appeals shall be publicly accessible on the certification body's and subcontractor's website in one of the official languages of FSC. For forest management this information shall be publicly available in the same language as the public certification summaries published by the certification body.
- 1.8.3 Upon receipt of a complaint or appeal, the certification body shall confirm whether the complaint or appeal relates to certification activities for which it is responsible and, if so, shall address it (NEW).
- 1.8.4 The certification body is required to handle complaints and appeals lodged in the same language as the public summary report or the language in which the complaint or appeal has been written.
- 1.8.5 The certification body shall handle complaints of stakeholders about their certified clients which are directly addressed to the certification body in an anonymous manner, if the stakeholders provide a justification for maintaining anonymity in relation to the certification body's client.
- 1.8.6 The certification body shall treat anonymous complaints and expressions of dissatisfaction that are not substantiated as complaints as stakeholder comments.

NOTE: A complaint can be considered anonymous where complainants do not reveal their identity to the certification body.

1.8.7 The certification body shall register all complaints with FSC.

## Stakeholder consultation note (information):

The Quality Assurance Unit of FSC is planning to create a database that captures all complaints filed and managed in the FSC system. This responds to an internal need and is also requested by many stakeholders. The purpose of the database is for FSC to get an overview of the complaints raised in the worldwide system. This will allow FSC to gather and analyze data, understand trends and gaps in the system. Details such as the frequency of entering complaints in the FSC database still need to be worked out. Stakeholder feedback on this proposed new requirement is welcome.

- 1.8.8 The certification body shall be responsible for gathering and verifying all necessary information (as far as possible) to progress the complaint or appeal to a decision (NEW).
- 1.8.9 The certification body has the duty of seeking a timely resolution of the complaints or appeals, in particular to:
  - a) acknowledge receipt of a complaint or appeal;
  - b) provide an initial response, including an outline of the certification body's proposed course of action to follow up on the complaint or appeal, within two (2) weeks of receiving a complaint or appeal;
  - c) keep the complainant(s)/ appellant(s) informed of progress in evaluating the complaint/ appeal;
  - d) investigate the allegations and specify all its proposed actions in response to the complaint or appeal within three (3) months of receiving the complaint or appeal;
  - e) notify the complainant when the complaint is considered to be closed.
  - NOTE: A complaint may be considered closed when the certification body has gathered and verified all necessary information, investigated the allegations, taken a decision on the complaint and responded to the complainant.
- 1.8.10 The decision resolving the complaint or appeal shall be made by, or reviewed and approved by, person(s) not involved in the certification activities related to the complaint or appeal (AMENDED).
- 1.8.11 To ensure that there is no conflict of interest, personnel (including those acting in a managerial capacity) who have audited the client, provided consultancy, or been employed by a client, shall not be used by the certification body to review or approve the resolution of a complaint or appeal for that client within five (5) years following the end of the consultancy or employment (NEW).

## Stakeholder consultation note (proposal):

The Accreditation standard Working Group proposes that a minimum period of five (5) years is required before a conflict of interest can be considered lapsed for lead auditors and personnel involved in the certification decision-making process (see Clause 1.4.11) or in the resolution of a complaint or appeal (see Clause 1.8.11 above).

The current two (2) years are not considered sufficient to de-link someone from an organization in the context of the FSC system.

- 1.8.12 The certification body shall record and track complaints and appeals, as well as actions undertaken to resolve them.
- 1.8.13 A party making a complaint shall be offered the opportunity to refer their complaint first to ASI's and ultimately to FSC's dispute resolution process if the issue has not been resolved through the full implementation of the certification body's own procedures, or the complainant disagrees with the conclusions reached by the certification body and/ or is dissatisfied by the way the certification body handled the complaint.

## 1.9 Publicly available information

- 1.9.1 The certification body shall maintain and make publicly available on its website, the following:
  - a) information about (or reference to) the FSC certification scheme, including evaluation procedures, rules and procedures for granting, for maintaining, for extending or reducing the scope of, for suspending, for withdrawing or for refusing certification;
  - b) a description of the sources of funding and general information on the fees charged to clients;
  - c) an organizational chart of the certification body, including its committees;
  - d) a description of the rights and duties of clients, including requirements, restrictions or limitations on the use of the certification body's name and FSC trademarks and on the ways of referring to the certification granted;
  - e) information about procedures for handling complaints and appeals;
  - f) a link to the FSC database of registered certificates (info.fsc.org);
  - g) a link to the FSC normative documents for certification according to the certification body's accreditation scope.

## Part 2: General management system requirements

## 2.1 Organizational structure

- 2.1.1 The certification body shall document its organizational structure, showing duties, responsibilities and authorities of management and other certification personnel and any committees. When the certification body is a defined part of a legal entity, the structure shall include the line of authority and the relationship to other parts within the same legal entity.
- 2.1.2 The management of the certification body shall identify the board, group of persons, or person having overall authority and responsibility for each of the following (AMENDED):
  - a) development of policies relating to the operation of the certification body;

- b) supervision of the implementation of the policies and procedures;
- c) supervision of the finances of the certification body;
- d) development of certification activities;
- e) development of certification requirements;
- f) evaluation (see Section 4.3);
- g) audit review (see Section 4.4);
- h) decisions on certification (see Section 4.5);
- i) delegation of authority to committees or personnel, as required, to undertake defined activities on its behalf;
- j) contractual arrangements;
- k) provision of adequate resources for certification activities;
- I) resolution of complaints and appeals;
- m) personnel competence requirements;
- n) management system of the certification body (see Section 2).
- o) reviewing the independence of the certification body;
- 2.1.3 The certification body shall have formal rules for the appointment, terms of reference and operation of any committees that are involved in the certification process (see Section 4). Such committees shall be free from any commercial, financial and other pressures that might influence decisions. The certification body shall retain authority to appoint and withdraw members of such committees.

## 2.2 Management system documentation

- 2.2.1 The certification body's top management shall establish, document, and maintain policies and objectives for fulfilment of this standard and the certification scheme and shall ensure that the policies and objectives are acknowledged and implemented at all levels of the certification body's organization (NEW).
- 2.2.2 The certification body's top management shall provide evidence of its commitment to the development and implementation of the management system and its effectiveness in achieving consistent fulfilment of this standard (NEW).
- 2.2.3 The certification body's top management shall appoint a member of management who, irrespective of other responsibilities, shall have responsibility and authority that include the following (NEW):
  - a) ensuring that processes and procedures needed for the management system are established, implemented and maintained;
  - b) reporting to top management on the performance of the management system and any need for improvement.

- 2.2.4 All documentation, processes, systems, records, etc. related to the fulfilment of the requirements of this standard shall be included, referenced, or linked to documentation of the management system (NEW).
- 2.2.5 All personnel involved in certification activities shall have access to the parts of the management system documentation and related information that are applicable to their responsibilities (personnel in the certification body's office and, as appropriate, in the field).
- 2.2.6 The certification body shall have a quality manual and associated operational procedures for:
  - a) handling of applications;
  - b) preparing and conducting audits (in pre-evaluation, main evaluation, surveillance and re-evaluation processes) according to the applicable FSC normative documents;
  - c) report reviewing and finalizing certification reports, (incl. public summaries, surveillance reports);
  - d) identification, management and tracking of nonconformities, including following-up on actions taken to correct nonconformities by clients;
  - e) all types of certification decision making;
  - f) issuing of certificates;
  - g) the review and approval of requests to use the FSC trademarks;
  - h) managing conflicts of interest;
  - i) managing complaints and appeals;
  - j) other procedures as necessary to conform with FSC requirements.

#### 2.3 Control of documents

- 2.3.1 The certification body shall establish procedures to control the documents (internal and external) that relate to the fulfilment of this standard.
- 2.3.2 The procedures shall define the controls needed to (AMENDED):
  - a) approve documents for adequacy prior to issue;
  - b) review and update (as necessary) and re-approve documents;
  - c) ensure that changes and the current revision status of documents are identified;
  - d) ensure that relevant versions of applicable documents are available at points of use:
  - e) ensure that documents remain legible and readily identifiable;

- f) ensure that documents of external origin are identified and their distribution controlled;
- g) prevent the unintended use of obsolete documents, and to apply suitable identification to them if they are retained for any purpose.

#### 2.4 Records

- 2.4.1 Accurate, complete, up-to-date and legible records related to implementation of FSC requirements shall be kept and be readily available for evaluation by ASI, including for example the following:
  - a) certification body personnel records including CVs, qualifications, confidentiality agreements, training records and declarations of potential conflicts of interest;
  - b) auditor and lead auditor performance appraisals;
  - c) list of subcontractors and contracts with subcontractors;
  - d) operation of certification body committees;
  - e) certification applications; audit and certification agreements;
  - f) all types of certification audit reports and summaries;
  - g) stakeholder and peer review comments and certification body responses;
  - h) certification decisions;
  - i) register of clients and their certified products;
  - j) certification complaints or appeals, including minutes or notes of committee meetings responsible for reviewing such complaints or appeals;
  - k) the implementation of internal audits and management reviews;
  - I) approvals for use of FSC trademarks;
  - m) communication of new or changed certification requirements to clients.
- 2.4.2 The certification body shall keep records confidential. Records shall be transported, transmitted and transferred in a way that ensures confidentiality is maintained (see also Section 1.7).
- 2.4.3 The certification body shall establish procedures to define the controls needed for the identification, storage, protection, retrieval, retention time and disposition of its records related to the fulfilment of this standard (NEW).
- 2.4.4 Records shall be stored safely and readily accessible for a period of at least seven (7) years.

#### 2.5 Internal audits

NOTE: ISO 19011 provides guidelines for conducting internal audits.

- 2.5.1 The certification body shall establish procedures for internal audits to verify that it fulfils the requirements of this standard and of applicable documents of the FSC normative framework, and that the management system is effectively implemented and maintained.
- 2.5.2 An internal audit program shall be planned, taking into consideration the importance of the processes and areas to be audited, as well as the results of previous audits.
- 2.5.3 Internal audits shall be performed at least once every twelve (12) months, or completed within a twelve-month time frame for segmented (or rolling) internal audits.
- 2.5.4 The certification body shall ensure that (AMENDED):
  - a) internal audits are conducted by personnel knowledgeable in certification, auditing and the requirements of this standard and related applicable requirements of documents of the FSC normative framework;
  - b) auditors do not audit their own work;
  - c) personnel responsible for the area audited are informed of the outcome of the audit:
  - d) any actions resulting from internal audits are taken in a timely and appropriate manner:
  - e) any opportunities for improvement are identified.
- 2.5.5 Planning and implementation of the internal audit program shall include the offices of all subcontractors, which shall be subject to at least one (1) annual audit by the certification body.
- 2.5.6 The internal audit procedure shall specify criteria and conditions (e.g. risk assessment results, internal Corrective Action Requests (CARs), number of certificates, complaints) where on-site audits of subcontractors are required. Each subcontractor shall be subject to at least one (1) on-site audit every three (3) years.
- 2.5.7 Internal audits shall include explicit consideration of all new or revised FSC normative documents and guidelines as published on the FSC website, to ensure that the certification body's policies and procedures are in continuous conformity with all applicable FSC requirements.

## 2.6 Management review

- 2.6.1 The certification body's top management shall establish procedures to review its management system at planned intervals, in order to ensure its continuing suitability, adequacy and effectiveness, including the stated policies and objectives related to the fulfilment of this standard.
- 2.6.2 These reviews shall be conducted at least once a year. Alternatively, a complete review broken up into segments shall be completed within a twelve-month time frame (NEW).
- 2.6.3 The input to the management review shall include information related to the following (NFW):

- a) results of internal and external audits;
- b) feedback from clients and interested parties related to the fulfilment of this standard:

NOTE: Interested parties include FSC.

- c) feedback from the committee for safeguarding impartiality;
- d) the status of preventive actions of the certification body and corrective actions issued against the certification body;
- e) follow-up actions from previous management reviews;
- f) the fulfilment of objectives;
- g) changes that could affect the management system;
- h) appeals and complaints.
- 2.6.4 The outputs from the management review shall include decisions and actions related to the following (NEW):
  - a) improvement of the effectiveness of the management system and its processes;
  - b) improvement of the certification body related to the fulfilment of this standard;
  - c) resource needs.

## 2.7 Corrective actions of the certification body

- 2.7.1 The certification body shall establish effective and operational procedures for identification, management and tracking of nonconformities in its operations.
- 2.7.2 The certification body shall also, where necessary, take actions to eliminate the causes of nonconformities in order to prevent recurrence.
- 2.7.3 Corrective actions shall be appropriate to the impact of the problems encountered (NEW).
- 2.7.4 The procedures for corrective actions shall define requirements for the following (AMENDED):
  - a) identifying nonconformities (e.g. from complaints and internal and external audits);
  - b) determining the causes of nonconformity;
  - c) correcting nonconformities;
  - d) evaluating the need for actions to ensure that nonconformities do not recur;
  - e) determining and implementing the actions needed in a timely manner;
  - f) recording the results of actions taken;

g) reviewing the effectiveness of corrective actions.

## 2.8 Preventive actions of the certification body

- 2.8.1 The certification body shall establish procedures for taking preventive actions to eliminate the causes of potential nonconformities (AMENDED).
- 2.8.2 Preventive actions taken shall be appropriate to the probable impact of the potential problems (NEW).
- 2.8.3 The procedures for preventive actions shall define requirements for the following (NEW):
  - a) identifying potential nonconformities and their causes;
  - b) evaluating the need for action to prevent the occurrence of nonconformities;
  - c) determining and implementing the action needed;
  - d) recording the results of actions taken;
  - e) reviewing the effectiveness of the preventive actions taken.

NOTE: The procedures for corrective and preventive actions do not necessarily have to be separate.

## Part 3: Resource requirements

## 3.1 Certification body personnel involved in certification activities

## Stakeholder consultation note (for information/ proposal):

Section 3.1 was prepared by Stephan Clauss, FSC Training Manager, based on input by the Expert Advisory Group for developing an Auditor Training Framework.

The Expert Advisory Group was established in June this year and consists of 14 technical experts (CBs, Network Partners, Training Institutions, one free-lance consultant). The Expert Advisory Group provides recommendations to the chamber-balanced Accreditation standard Working Group, that has the formal mandate to guide the revision process of FSC-STD-20-001.

<u>The GA Motion 52</u> on "Training and Qualification requirements for FSC Audit Teams" will be incorporated in the revision process of FSC-STD-20-001. The Motion requests FSC "to provide clear standards and procedures for the competencies, training and subsequent registration of all FSC Auditors".

The changes and additions proposed in the first revised draft already respond to the Motion, but a more detailed analysis and interpretation of the Motion is required, to identify which additional measures should be taken. These are planned to be reflected in the second revised draft standard.

## Creation of a separate standard for CB personnel and competence

Some members of the Working Group are in favor of creating a stand-alone standard for CB personnel and competence requirements (removing Section 3.1 and Annexes 1 and 2 from FSC-STD-20-001). The following arguments in favor and against creating a separate standard were identified:

Pro's Con's

- Standard can be revised upon need - Not in-line with FSC's approach to reduce

(no full revision of FSC-STD-20-001 is required);

- Easier to handle according to initial stakeholder feedback: all requirements related to personnel and competencies are in one place.
- the number of normative documents rather than expand;
- Development of a new normative document requires additional process steps to be taken according to FSC-PRO-01-001. As a result of this:
  - More time would be needed to develop requirements (consultation and FSC Board approval required to initiate development of a new standard, new working group to be established, etc.);
  - More resources would be needed

Your feedback on whether to create a separate standard or not is welcome.

- 3.1.1 The certification body shall have personnel contracted or employed with sufficient capacity and the necessary competence for managing its work related to the implementation of the FSC accredited certification program.
- 3.1.2 The certification body shall employ, or have access to, a number of auditors, team leaders, technical experts and translators in order to cover all operations and to handle the volume of audit work related to the implementation of the FSC accredited certification program.
- 3.1.3 The personnel shall be competent for the functions they perform, including making required technical judgments, defining policies and implementing them.
- 3.1.4 The certification body shall establish, implement and maintain a procedure for the management of competencies of personnel involved in the certification process (see Section 4).
- 3.1.4.1 In general this procedure shall require the certification body to:
  - a) determine the criteria for the competence of personnel for each function in the certification process taking into account the following requirements:

## Stakeholder consultation note (proposal):

There are no specifications for application reviewers in the current version of the STD while this could make sense. The following are suggestions:

- shall be qualified at the level of an auditor (see Annex 1)
- demonstrate a level of knowledge and experience sufficient to prepare the audit processes and select a lead auditor and an audit team

(as proposed by ISO 19011, 5.3.2, p. 8)

- know.
- activities, products and processes of the auditee;
- applicable legal and other requirements relevant to the activities and products of the auditee:
- customers, suppliers and other interested parties of the auditee, where applicable.

Know the activities of an audit process and be able to, in a systematic and consistent manner:

 Review the audit plan to evaluate its conformity with requirements and if it is adequate to the audit objectives and requirements established by the audit program;  Evaluate the content of the audit report: conformity with objectives, audit scope, classification of findings and use of adequate evidence; conformity of the organization's COC or FM system, as applicable.

Are you in favor of introducing the proposed specifications for application reviewers or not? Please explain.

- i. auditors and lead auditors shall be qualified as specified in the competency scheme (Annex 1);
- ii. the certification decision maker(s) (Clause 4.5.2) shall be qualified at the level of a lead auditor (see Annex 1) and demonstrate a level of knowledge and experience sufficient to evaluate the verification processes, audit documentations, other associated evidence and recommendations made by the audit team.

## Stakeholder consultation note (proposal):

The above specifications for the certification decision maker are largely taken from the old version of FSC-STD-20-001. There might be a need to be more specific about this – while this risks to blow up the core STD text a lot. Possible amendments could go like this: Know the activities of an audit process and be able to, in a systematic and consistent manner:

- Review the audit plan to evaluate its conformity with requirements and if it is adequate to the audit objectives and requirements established by the audit program;
- Evaluate the content of the audit report: conformity with objectives, audit scope, classification of findings and use of adequate evidence; conformity of the organization's COC or FM system, as applicable.

Are you in favor of introducing the above presented amendments for certification decision makers or not? Please explain.

- b) select and employ the necessary personnel. For the selection of auditors and lead auditors, personal attributes shall be taken into consideration.
  - NOTE: Personal attributes are characteristics that affect an individual's ability to perform specific functions. Knowledge about personal attributes of individuals enables a certification body to take advantage of their strengths and to minimize the impact of their weaknesses. Desired personal attributes that are important for personnel involved in certification activities are described in Annex 1.
- 3.1.4.2 In terms of training this procedure shall require the certification body to:
  - a) identify initial and continuous training needs on all relevant FSC normative documents, certification processes, requirements, methodologies, activities, other relevant certification scheme requirements, the history and objectives of FSC and relevant changes to the FSC system (i.e. foremost but not limited to new or revised normative documents);
  - b) define content of initial and continuous training courses according to the findings under Clause 3.1.4.2a) and/or monitoring and evaluation results (Clause 3.1.4.3) as well as on the basis of the respective competency requirements listed in Annex 1;
  - c) carry out or provide access to a formal initial auditor training program as well as continuous training activities;

- d) ensure that trainers of auditors:
  - i. are lead auditors in the respective field they are delivering training on;
  - ii. hold a formal qualification as ISO 9001, ISO 14001, or OHSAS 18001 auditor;
  - iii. fulfill all requirements as listed for auditors in Annex 1;
  - iv. have inter-personal skills enabling them for group work and training;
  - v. have gained demonstrated professional experience in the relevant scope and area as lead auditors of at least two (2) years;
  - vi. are impartial in relationship to the training course participants (i.e. shall not be involved in personnel decisions related to their trainees);
- e) ensure that initial and continuous training courses conclude with examinations designed in a way to assess competencies based on, and consistent with the FSC competency scheme (Annex 1), by written, oral, practical, observational or other reliable and objective means.

The design of examination requirements shall ensure the comparability of results of each single examination, both in content and difficulty, including the validity of fail/pass decisions;

- demonstrate that the personnel have the required competencies for the duties and responsibilities they undertake by using the FSC competency scheme;
- g) formally authorize personnel for functions in the certification process;
- h) provide records of their auditors to the ASI Database including but not limited to the information listed under Clause 3.1.6.

#### Stakeholder consultation note (for information):

According to the current standard lead auditors shall be registered with ASI. To date this only means that ASI maintains an excel file where auditors are listed.

This requirement is planned to be expanded. It still needs to be determined how the information will be collected (whether via the FSC Database or directly provided to ASI) and whether and how it will be verified by ASI.

The FSC Auditor Registry could provide all certification bodies access to a pool of qualified auditors and is one element of the GA Motion 52.

- 3.1.4.3 For the monitoring and evaluation of performance the certification body shall:
  - a) implement a documented procedure with defined criteria for monitoring and evaluation of the performance of auditors and lead auditors. The monitoring process shall encompass:
    - i. a review of competencies as listed in Annex 1 in the light of their performance;
    - ii. an assessment of conformity with certification bodies' operational procedures and guidelines including issues with conflict of interest and confidentiality standards;

- iii. a link between the individual design of a monitoring process with a consideration about how often auditors are involved in audits and about the level of risk linked to their activities;
- iv. a combination of on-site observation, review of audit reports and feedback from clients;
- v. a consideration about the frequency of on-site observations based on need determined by all monitoring information available;
- vi. a consideration about further training needs based on the monitoring results.
- b) evaluate the performance of each auditor and lead auditor based on the documented monitoring results and a witness audit at least once every three (3) years. The results are to be documented in the auditor performance appraisal report and to be incorporated into further consideration for individual training needs.
- 3.1.5 The certification body shall require personnel involved in the certification process to sign a contract or other documents by which they commit themselves to the following:
  - a) to conform with the rules defined by the certification body, including those relating to confidentiality, anti-corruption and independence from commercial and other interests;
  - b) to declare any prior and/or present association on their own part, or on the part of their employer, with:
    - i. a supplier or designer of products, or
    - ii. provider or developer of services, or
    - iii. an operator or developer of processes to the evaluation or certification of which they are to be assigned;
  - c) to reveal any situation known to them that may present them or the certification body with a conflict of interest.

Certification bodies shall use this information as additional input into identifying risks to impartiality raised by the activities of such personnel, or by the organizations that employ them.

- 3.1.6 The certification body shall maintain records of all certification body personnel involved in work related to the FSC certification scheme. The records shall include a means to confirm the competence, qualification and training status of personnel. The content of the records shall include, but not be restricted to the following:
  - a) name and address;
  - b) position(s) currently held;
  - c) qualification level and progress documented through CV and reports including but not limited to scope (FM, COC, CW), languages spoken, training courses passed, and years of experience in relevant area;

- d) number and respective year of on-site assessments/peer reviews;
- e) results of monitoring processes and evaluations (performance appraisal report);
- f) list of agreements and contracts signed with the certification body including but not limited to confidentiality agreement(s), declaration(s) of potential and identified conflict(s) of interest, work contract(s), authorizations;
- g) ensure that all relevant personnel record documents contain information about the time of the latest update.

## 3.2 Subcontracting

- 3.2.1 The certification body may subcontract (outsource) work related to certification to a separate legal entity. In such a case the certification body shall ensure that the subcontractor conforms with the applicable provisions of this and other FSC standards and requirements relevant to evaluations or other technical activities, including all provisions concerning qualifications, experience, performance review, objectivity, impartiality and confidentiality.
- 3.2.2 Decisions for granting, maintaining, renewing, expanding or reducing the scope of, suspending, reinstating, or withdrawing certification may only be subcontracted to entities under the organizational control of the certification body (see Clause 4.5.4).

## **Stakeholder consultation note (proposal):**

Please note that the draft standard contains an amended definition of "subcontractor", specifying that also sister companies, subsidiaries and any companies linked by ownership to the certification body are considered as subcontractors. This modification is introduced with the aim to ensure that FSC requirements are met at all times, regardless which entity carries out activities within the accreditation scope. It is also a response to feedback received about instances of lack of control of subsidiaries and differences in interpretation of the current standard.

At the same time it is proposed to make a distinction between subcontractors under the organizational control of the certification body and other subcontractors. The standard wording was aligned with ISO 17065 that allows subcontracting of certification decisions to entities under the organizational control of the certification body (see Clause 4.5.4).

- 3.2.3 The certification body shall have a legally binding contract with the legal entity that provides the subcontracted service. This contract shall (AMENDED):
  - a) require the subcontractor to conform with all the relevant requirements of this standard and related applicable norms, including arrangements for confidentiality and conflict of interest;
  - b) include a clear description of the scope of the subcontracted activities, both in terms of services and geographical coverage;
  - c) include a prohibition for subsequent subcontracting of certification activities covered by the accreditation of the certification body;
  - d) require the subcontractor to use competent and qualified personnel as specified in this standard, who shall be subject to regular performance review (incl. on-site witnessing) by the subcontractor and the certification body;

- e) require the subcontractor to agree to periodic internal audits of the activities covered by the subcontracting contract conducted by a qualified and impartial representative of the accredited certification body;
- f) require the implementation of subcontracted services according to the accredited procedures of the certification body;
- g) prohibit that the subcontractor makes any claims regarding the accredited status, or implies in any way that they are in fact accredited;
- h) require the subcontractor to describe their services as being 'in association with [name of accredited certification body]';
- i) prohibit the use of the FSC trademarks in relation to the subcontractor's organization or the services offered under the contract without prior authorization by FSC;
- j) prohibit the right to independently grant approval for the use of FSC trademarks to clients unless the subcontractor has been trained by FSC.
- k) any additional restrictions in the accreditation contract of the accredited certification body shall also apply to the subcontractor.
- 3.2.4 It is at the discretion of the certification body to decide whether the subcontractor should be entitled to use FSC trademarks. Subcontractor applications for authorization shall be submitted to FSC by the certification body.
- 3.2.5 The accredited certification body shall notify ASI within thirty (30) days of any new contracts or changes in the subcontractor's status. ASI shall be given the following information:
  - a) name of the subcontractor;
  - b) contact information including: address, telephone, fax and email;
  - c) scope of the contract (geographic area, type of evaluation or other);
  - d) date of signing of the contract;
  - e) date of expiry of the contract;
  - NOTE: Subcontractors are subject to monitoring by ASI (regulated by ASI surveillance procedures).
- 3.2.6 The certification body shall not allow any of their subcontractors to manage more than five hundred (500) FSC chain of custody certificates or more than one hundred (100) FSC forest management certificates. In this case the subcontractor shall be required to apply for their own FSC accreditation.

#### Stakeholder consultation note (proposal):

The Working Group discussed whether the threshold number of certificates that subcontractors are allowed to manage (see Clause 3.2.6 above) should be maintained or not. The preliminary conclusion is that such a clause is not necessary if the requirements for internal audits are strengthened as proposed in Section 2.

## 3.2.7 The certification body shall:

- a) take full responsibility for all activities subcontracted to another body;
- b) ensure that the body that provides subcontracted services, and the personnel that it uses, are not involved, either directly or through any other employer, in such a way that the credibility of the results could be compromised;
- c) the certification body shall have documented policies, procedures and records for the qualification, assessing and monitoring of subcontractors according to the requirements in this standard, unless the option of subcontracting is explicitly excluded by the certification body;
- d) maintain a list of approved providers of subcontracted services;
- e) implement corrective actions for any breaches of the contract in Clause 3.2.3 or other requirements in Section 3.2 of which it becomes aware (NEW);
- f) inform the client in advance of subcontracting activities, in order to provide the client with an opportunity to object (AMENDED).
- 3.2.8 ASI reserves the right to suspend or withdraw accreditation (or part of it) from a certification body if, in the opinion of ASI, the activities of the subcontractor result in the accredited certification body being in nonconformity with FSC requirements for accreditation.
- 3.2.9 The certification body shall retain records in their office to demonstrate that all requirements in relation to subcontracting have been effectively fulfilled. At minimum this shall include:
  - a) the legally binding contract between the accredited certification body and the subcontractor;
  - b) records demonstrating the competence of the subcontractor by documented assessments performed by qualified personnel according to documented procedures that includes an initial assessment of competence and ongoing, at least annual, monitoring of performance of the subcontractor and its staff;
  - c) copies of all materials and information relating to the accredited certification body's clients (including monitoring schedules, reports, logo approvals, etc.) are to be available to ASI assessors and managers within 48 hours upon request.

## Part 4: Process requirements

## 4.1 Application for certification

4.1.1 The certification body shall provide the applicant with all the necessary information on the certification process and the certification requirements, including a copy of the standard(s) to be used for evaluation.

NOTE: If any document developed by a certification body mixes requirements from FSC and from other sources, this shall be made explicit in the document.

- 4.1.2 When receiving an application for certification, the certification body shall obtain all the necessary information to plan and conduct the certification process in accordance with applicable FSC certification requirements (AMENDED).
- 4.1.3 Applications for forest management or controlled wood forest management certification shall include a definition of the scope in terms of individual management units (MUs).
- 4.1.4 Applications for chain of custody certification shall include a definition of the scope in terms of FSC product groups and sites to be evaluated.
- 4.1.5 For applicants for forest management certification, the certification body shall at minimum fill-in the following data fields within ten (10) business days after setting up the database entry in the FSC database of registered certificates (<u>info.fsc.org</u>):
  - a) forest type;
  - b) total area in ha (based on Annual Administration Fee categories);
  - c) anticipated evaluation timeframe:
    - i. the proposed dates of the pre-evaluation (if applicable) and of the main evaluation as accurately as possible,
  - ii. as long as the dates have not been agreed with the client, the entry should read "not yet scheduled";
  - d) evaluation contacts:
    - i. name of designated lead auditor,
    - ii. contact for stakeholder comments (name and e-mail address of the certification body's contact),
  - iii. link to the FSC section of the certification body's website.

NOTE: This information will be publicly displayed on the FSC webpage.

## **Stakeholder consultation note (for information):**

Please note that FSC still needs to adapt the FSC Database to make this information publicly available as specified in the NOTE.

- 4.1.6 Applicants for FSC certification shall be required to obtain a 'License Agreement for the FSC Certification Scheme' before entering into a certification agreement with the certification body.
- 4.1.7 Applicants for FSC certification shall be required to disclose current or previous applications or certifications with FSC or other certification schemes in the last five (5) years.
- 4.1.8 The certification body shall obtain relevant information on the applicants' FSC certification history from the previous certification body and consider it in the certification process.
  - NOTE: Relevant information includes for example CAR reports or stakeholder comments collected during the main audit which are not confidential.
- 4.1.9 The certification body shall reject applicants for certification of MUs or sites that are already covered by an active FSC certificate, except where a certificate transfer process according to FSC-PRO-20-003 is ongoing.

The ISEAL Assurance Code requires that clients and applicants inform about other certificates held for the same or different certification schemes. For FSC this provides an opportunity to enhance calibration among certification bodies and increase transparency.

Additionally a gap in the standard is closed by prohibiting that a certificate holder can have two certificates with the same scope of MUs or COC sites. This is to avoid for instance, that a certificate holder whose certificate was suspended simply goes to another CB to get a new certificate rather than correcting the nonconformities to lift suspension of the existing certificate.

## 4.2 Application review

- 4.2.1 The certification body shall review the information obtained (see Section 4.1) to ensure that:
  - a) the information about the client and the processes is sufficient for planning and conducting the certification process;
  - b) any known differences in understanding between the certification body and the client is resolved, including agreements on standards or other normative documents:
  - c) the scope of certification is defined;
  - d) the certification body has the means and resources to perform the required evaluation activities:
  - e) the certification body has the competence and capability to perform the certification activity.
- 4.2.2 The certification body shall decline to undertake a specific certification if it lacks any competence or capability for the certification activities it is required to undertake (NEW).

#### 4.3 Evaluation

- 4.3.1 The requirements against which the processes and products of a client shall be evaluated for the purpose of any claims relating to FSC or conformity with FSC requirements shall be those specified in FSC-approved standards. All interpretations of FSC standards are at the sole discretion of the FSC International Center.
- 4.3.2 The certification body shall conduct evaluations for forest management certification in accordance to FSC-STD-20-007 and related normative documents.
- 4.3.3 The certification body shall conduct evaluations for chain of custody certification in accordance to *FSC-STD-20-011* and related normative documents.
- 4.3.4 The certification body shall conduct evaluations for controlled wood certification in forest management enterprises in accordance to *FSC-STD-20-012* and related normative documents.
- 4.3.5 The certification body shall have a plan for the audit activities to allow for the necessary arrangements to be managed.

- 4.3.6 The certification body shall assign an audit team in conformity with the requirements specified in Annex 2 Audit teams. The requirements also apply in the case of subcontracted audit tasks.
- 4.3.7 For forest management audits the certification body shall rotate their auditors so that no person serves as a member of the audit team for more than three (3) consecutive audits of the same client. Exemptions shall be possible for regions where there are very few certificate operations.
  - NOTE: This clause does not apply to local or technical experts.
- 4.3.8 For all other types of audits the certification body should ensure that no client is audited by the same lead auditor on more than three (3) consecutive audits.

4.3.7 includes the text of the approved GA 2014 Motion 66 on Auditor Rotation, which intends to improve the rigor and effectiveness of forest management audits. The criteria for enabling exemptions to this clause (determining what "very few certificate operations" means, e.g. considering the spread of FM certificates per certification body across countries) and how this process shall be handled still needs to be developed. Once drafted, the wording of the clause may need to be amended.

The requirement for all other types of audits remains unchanged. Please note that "should" is a normative term which indicates that among several possibilities one is recommended as particularly suitable, but not necessarily required. A certification body can meet these requirements in an equivalent way provided this can be demonstrated and justified.

An <u>alternative option</u> would be to also strengthen the requirements for COC and CW audits and therefore to extend the Motion 66 to apply to any types of audits. Do you support this idea?

- 4.3.9 The certification body shall provide all auditors with an up-to-date 'audit handbook' or equivalent which includes all the guidance necessary for the auditors to complete successful evaluations (pre-, main-, surveillance-, and re-evaluations) in accordance with the documented procedures specified by the certification body. Guidance shall include procedures for the audit of the services under the scope of accreditation. The contents of the audit handbook shall include instructions for auditors regarding at least:
  - a) the implementation of any checklists, guidance documents or options for interpretation of standards;
  - b) the implementation of any additional normative documents, for example those relating to group and multi-site certification, pesticides derogation processes etc.;
  - c) detecting, analyzing, grading, and addressing nonconformities;
  - d) requirements for opening meetings, closing meetings, and communication of audit findings in accordance to *ISO 19011*;
  - e) requirements for report writing in accordance to relevant FSC standards and certification body's procedures;
  - f) procedures for the audit of trademark uses in conformity with FSC trademark requirements for on-product and promotional uses.

4.3.10 The certification body shall conduct the evaluation activities in accordance with the audit plan (see Clause 4.3.5).

#### **Audit results**

## **Stakeholder consultation note (proposal):**

The requirements related to handling nonconformities are proposed to be moved from the scope specific accreditation standards (FSC-STD-20-007, FSC-STD-20-011, FSC-STD-20-012) to this standard, as they apply generically.

The requirements below are based on the revised accreditation standard for COC evaluations (FSC-STD-20-011), which was publicly consulted twice during the past two years and published in September 2014.

- 4.3.11 The certification body shall evaluate each nonconformity identified in the audit to determine the root causes and to conclude whether it constitutes a minor or major nonconformity.
- 4.3.12 Nonconformities shall be graded as follows:
  - a) a nonconformity shall be considered minor if:
    - i. it is a temporary lapse, or
    - ii. it is unusual/non-systematic, or
    - iii. the impacts of the nonconformity are limited in their temporal and organizational scale, and
    - iv. it does not result in a fundamental failure to achieve the objective of the relevant requirement.
  - b) a nonconformity shall be considered major if, either alone or in combination with further nonconformities, it results in, or is likely to result in a fundamental failure to achieve the objective of the relevant requirement within the scope of the evaluation. Such fundamental failures shall be indicated by nonconformities which:
    - i. continue over a long period of time, or
    - ii. are repeated or systematic, or
    - NOTE: 'Repeated' means that the same root cause that already resulted in a minor nonconformity in a previous audit has been re-detected as a reason for a nonconformity in a following audit within the same five-year certification period/cycle. This is usually indicated by a nonconformity with the same indicator / requirement as in a previous audit.
    - iii. affect a wide range of the production, or
    - iv. are not corrected or adequately addressed by the client once they have been identified.
    - NOTE 1: The auditor may also identify the early stages of a problem which does not yet constitute a nonconformity, but which the auditor considers may lead to a future nonconformity if not addressed by the client. Such observations should be recorded in the audit report as 'observations' for the benefit of the client.
    - NOTE 2: As long as a CAR has not been confirmed in a formal decision making process, nonconformities can be re-graded as minor or major.

- 4.3.13 The certification body shall consider the impact of a nonconformity, taking account of how it affects the integrity of the FSC system, when evaluating whether a nonconformity results in or is likely to result in fundamental failure to achieve the objective of the relevant requirement.
- 4.3.14 Nonconformities shall be transformed into CARs that at minimum include a description of the nonconformity (including the root cause) and a timeline within which the nonconformity shall be fully implemented by the client.
- 4.3.15 CARs shall not be presented in a prescriptive way that could be perceived as providing consultancy.
- 4.3.16 The certification body should present the nonconformities during the audit closing meeting and shall at latest inform the client of all nonconformities with the submission of the audit report.
- 4.3.17 The CAR timelines commence from the moment when they are formally presented to the certificate holder and no later than three (3) months from the audit closing date. CARs shall have the following timeframes:
  - a) minor nonconformity shall be corrected within the maximum period of one (1) year (under exceptional and justified circumstances the timeline may be extended to two (2) years);
  - b) major nonconformity shall be corrected within three (3) months (under exceptional and justified circumstances within six (6) months).
  - NOTE: Action(s) taken to correct a major nonconformity may continue over a period of time which is longer than three (3) months. However, action must be taken within the specified period which is sufficient to prevent new instances of nonconformity within the scope of the certification.
- 4.6.18 The absence of a valid 'License Agreement for the FSC Certification Scheme' shall be treated as a formal major nonconformity which has to be corrected in a period of maximum four (4) weeks. Failure in closing this major nonconformity shall lead to the suspension of the certificate.
- 4.3.19 The certification body shall determine whether CARs have been appropriately implemented within their timeframes. If the action taken is not considered adequate, then:
  - a) minor nonconformity shall become major nonconformity and shall be corrected within a maximum period of three (3) months (or in exceptional and justified circumstances six (6) months);
  - b) major nonconformity shall lead to immediate suspension of the certificate.
- 4.3.20 Major nonconformities shall not be downgraded to minor nonconformities.
- 4.3.21 The certification body shall inform the client if an on-site audit is required to verify that nonconformities have been corrected (NEW).

## Reporting

- 4.3.22 The certification body shall document the findings and conclusions of all audit activities prior to review and decision making in a certification report in conformity with the report writing requirements specified in:
  - a) FSC-STD-20-007a for forest management certification reports;
  - b) FSC-STD-20-007b for forest management public summary reports;
  - c) FSC-STD-20-011 for chain of custody certification reports;
  - d) FSC-STD-20-012 for controlled wood forest management certification reports.

#### 4.4 Audit review

- 4.4.1 The certification body shall assign at least one (1) person to review all information and results related to the audit. The review shall be carried out by person(s) who have not been involved in the audit process (NEW).
- 4.4.2 Recommendations for a certification decision based on the review shall be documented (NEW).

## Stakeholder consultation note (for information):

The two clauses below on the FM peer review process are planned to be moved to the scope specific accreditation standard FSC-STD-20-007 Forest management evaluations during the next revision process of FSC-STD-20-007.

- 4.4.3 Draft forest management certification reports shall be submitted to a formal peer review process unless the MU under evaluation meets the specification as a small or low intensity MU or small or low intensity group (see *FSC-STD-01-003*) in the country in which the evaluation takes place.
- 4.4.4 The formal peer review process for draft forest management certification reports shall include the following requirements:
  - a) the report shall be reviewed by at least one (1) independent peer reviewer with the experience and technical knowledge necessary to assess the adequacy of the report and the validity of the proposed certification decision;
  - NOTE: The certification body should seek additional peer reviewers with specialist knowledge in order to supplement any gaps in the range of expertise of the members of the evaluation team itself.
  - b) in the case of evaluated MUs that meet the eligibility criteria for mandatory preevaluations as defined in FSC-STD-20-007 Clause 3.1.1, the report shall be reviewed by a second peer reviewer, who shall be selected according to the knowledge related to the eligibility category of FSC-STD-20-007 Clause 3.1.1, i.e. knowledge about plantation management, boreal or tropical forest management, or high conservation values (as applicable);
  - c) the peer reviewer(s) shall operate according to clear terms of reference, which include the requirement to comment explicitly on:
    - i. the adequacy of the field work as the basis for making a certification decision;

- ii. the clarity of presentation of the observations as the basis for a certification decision;
- iii. whether the proposed certification decision is justified by the observations presented;
- d) peer reviewer(s) shall not be full or part-time employees of the certification body, and shall be subject to the same requirements relating to independence and confidentiality as other personnel with input into the certification decision;
- e) the reviewer(s) shall take account of the local and national context with regards to forest management, and shall consider environmental, social and economic perspectives;
- f) the comments of the peer reviewer(s) shall be attributed and documented;
- g) the certification body shall respond in writing to the peer reviewer(s)' comments, and provide the peer reviewers with a copy of its response;
- h) the certification body shall finalize the audit report taking the comments of the peer reviewer(s) into account.

#### 4.5 Certification decision

- 4.5.1 The certification body shall be responsible for, and shall retain authority for, its decisions relating to certification.
- 4.5.2 The certification body shall assign a certification decision making entity to make the certification decision based on all information related to the audit, its review, and any other relevant information. The person(s) of the certification decision making entity shall not have been involved in the evaluation process (see Section 4.3) (AMENDED).
- 4.5.3 The certification decision making entity shall:
  - a) have clear rules for membership, including requirements for qualification, experience and impartiality;
  - b) consist of individuals with no financial or other commercial interest in the outcome of the certification decision;
    - NOTE: This does not refer to a regularly paid salary of an employee who is member of the certification body's decision making entity.
  - c) not include individuals who have taken part in the audit as lead auditors, auditors or technical experts.
- 4.5.4 The person(s) of the certification making entity shall be employed by, or shall be under contract with, one of the following (NEW):
  - a) the certification body (see Section 3.1);
  - b) an entity under the organizational control of the certification body according to one of the following forms:

- i. whole or majority ownership of another entity by the certification body;
- ii. majority participation by the certification body on the board of directors of another entity;
- iii. a documented authority by the certification body over another entity in a network of legal entities (in which the certification body resides), linked by ownership or board of director control.
- 4.5.5 The persons employed by, or under contract with, entities under organizational control shall fulfil the same requirements of this standard as persons employed by, or under contract with, the certification body (NEW).
- 4.5.6 The results of the main evaluation are valid for a maximum period of six (6) months in the case of chain of custody evaluations and for a maximum period of twelve (12) months in the case of forest management and controlled wood forest management evaluations. Within this period a certification decision shall be taken and communicated to the client (see also Clause 4.5.8 for decisions not to grant certification). Otherwise, the results of the main evaluation are considered out-of-date and a new on-site main evaluation shall be conducted before a certificate can be issued.

The requirement for COC evaluations was recently developed and consulted during the revision of FSC-STD-20-011. The Accreditation standard Working Group is proposing to introduce a clause in this standard and to include a time limit for FM and CW FM as well. An alternative option would be to require that between one (1) year and one and a half (1,5) years after the main evaluation a risk based on-site audit shall be conducted and only after one and a half (1,5) years a complete new main evaluation is required. The longer timeline for FM evaluations considers the complexity of FM evaluations. In particular "negative" certification decisions require more time.

Do you agree to the suggested timelines in Clause 4.5.6 or do you prefer the alternative option as proposed above?

- 4.5.7 The certification body shall have the right to delay or postpone its decision on certification in order to take proper account of new or additional information which has become available to the certification body and which has not already been considered in its audit report and which, in the opinion of the certification body, could affect the outcome of its evaluation.
- 4.5.8 The certification body shall notify the client of a decision not to grant certification, and shall provide the reasons for the decision (NEW).

#### 4.6 Issuing of certificate

- 4.6.1 The certification body shall not issue or re-issue a certificate if there are outstanding major nonconformities with applicable certification requirements.
- 4.6.2 A printed certificate shall only be issued after a positive formal certification decision has been taken by the designated certification decision making entity and upon request of the client.
- 4.6.3 The certification body shall register a certificate in the FSC database of registered certificates (info.fsc.org) before it is issued or re-issued. The registration requires the

entry of all specified data together with an electronic copy of the public summary certification report (as applicable).

- NOTE 1: In the case of FSC announcing a malfunction of the on-line registration service, ASI and FSC shall be informed that a certificate has been issued or re-issued within ten (10) business days of its issue or re-issue.
- NOTE 2: Certificates which are not registered with FSC are not considered valid.
- NOTE 3: Certification bodies are responsible for keeping their data entries for all applicable requirements and public summary reports up-to-date.
- 4.6.4 All forest management and chain of custody certificates issued by the certification body within the scope of its FSC accreditation shall include:
  - NOTE: This clause does not apply to controlled wood forest management certificates (see *FSC-STD-20-012* for controlled wood forest management certificates).
  - a) the FSC logo, which shall be no smaller than the logo of the certification body;
  - b) the name and address of the certification body;
  - c) the legal name and registered address of the certificate holder plus any trade names and other addresses that will be used for sales invoices:
  - d) a description of the scope of the certificate, including a general description of the type of products covered by the certificate according to FSC-STD-40-004a and a reference to the specific standard(s) (including the version numbers) that the certificate holder has been evaluated against, as defined by FSC-STD-20-007 and FSC-STD-20-011 accordingly;
  - NOTE: In the case of project certificates, the scope of the certificate shall include the specification of whether partial or full project certification has been awarded.
  - e) a reference to the FSC database of registered certificates (<u>info.fsc.org</u>) for the full list of product groups covered by the certificate;
  - f) a clear statement to the effect that the certificate shall remain the property of the certification body that issued it, and that the certificate and all copies or reproductions of the certificate shall be returned or destroyed if requested by the certification body;
  - g) the date of issue of the certificate;
  - h) the date of expiry of the certificate together with the disclaimer "The validity of this certificate shall be verified on (<a href="info.fsc.org">info.fsc.org</a>)";
  - NOTE: The expiry date requirement does not apply for project chain of custody certificates.
  - i) an issue number (for re-issued or renewed certificates);

- j) the signature of the individual(s) of the certification body assigned such responsibility;
- k) a disclaimer stating: "This certificate itself does not constitute evidence that a particular product supplied by the certificate holder is FSC-certified [or FSC Controlled Wood]. Products offered, shipped or sold by the certificate holder can only be considered covered by the scope of this certificate when the required FSC claim is clearly stated on sales and delivery documents";
- I) the certificate registration code issued by the certification body and of the form:

XXX-FM-#####-ABC for forest management only certificates<sup>2</sup>,

XXX-FM/COC-######-ABC for joint forest management and chain of custody certificates,

XXX-COC-######-ABC for chain of custody certificates.

XXX-CW-#####-ABC for controlled wood chain of custody certificates (against FSC-STD-40-005),

NOTE: the CW code issued within a COC certificate shall have the same 6 digits as the COC code.

XXX-CW/FM-##### for controlled wood forest management certificates (against FSC-STD-30-010),

XXX-PRO-#####-ABC for project chain of custody certificates,

where XXX are the initials of the certification body agreed with ASI, ###### is a unique six digit number or combination of numbers and letters issued by the certification body itself, and ABC is a sub-certificate code issued only to the members of group certificates, in the form, A, B, C, AA, AB, etc.).

- NOTE 1: For reasons of clarity the certification body shall not use the same code number for valid certificates issued to different legal entities (i.e. the certification body would not issue a chain of custody certificate XXX-COC-123456 to company A, and an FM certificate XXX-FM-123456 to company B).
- NOTE 2: If a certificate is withdrawn and later re-issued to the same legal entity the original registration code may be used.
- 4.6.5 Any wording, including the claim of conformity, to be included on certificates in addition to the information as required in Clause 4.6.4 is subject to prior written approval by FSC.

## Certificates and codes for group and multi-site scheme participants

4.6.6 One (1) group or multi-site certificate shall be issued to the Central Office / group entity with a list of all Participating Sites either on the certificate itself or in an appendix or as otherwise referred to in the certificate.

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<sup>&</sup>lt;sup>2</sup> This type of certificate shall only be issued to applicants that solely include ecosystem services in their certificate scope and that do not intent to sell any forest products according to their management objectives, e.g. in the case of National Parks, conservation areas, water protection areas.

NOTE: The FSC database will automatically generate certificate sub codes for the Participating Sites covered by a COC group or multi-site certificate.

## Stakeholder consultation note (for information):

During the recent revision process of the group and multi-site COC certification standards it was decided that the FSC database will automatically generate sub codes for Participating Sites of group and multi-site COC certificates to harmonize sub codes used across certification bodies. It is currently being investigated whether this should also be done for FM group members (Participating Sites).

4.6.7 The scope specified on the group or multi-site certificate shall make clear that the covered products and processes/ activities are performed by the network of Participating Sites, and not necessarily by each of them.

#### 4.7 Surveillance

- 4.7.1 Surveillance evaluations of FSC clients shall take place at least annually, and may be more frequent depending on factors such as:
  - a) the scale of the operation (e.g. the area of an MU, the quantity of production in the case of a manufacturer, or the value and/or volume turnover in the case of a trader);
  - b) the intensity of resource management in the case of a MU (e.g. the frequency and level of timber harvest);
  - c) the complexity of the chain of custody control system;
  - d) results of risk assessment in the case of group certification;
  - e) the ecological or social sensitivity of the resource base to management intervention;
  - f) the experience and track record of the operators involved (managers and personnel, contractors);
  - g) the number and nature of any nonconformities identified by the certification body;
  - h) the number and nature of any complaints submitted by stakeholders.
  - NOTE 1: "Annual" means that audits take place at least once per calendar year and additionally for chain of custody audits not later than fifteen (15) months after the last audit. Timelines for implementing CARs have to be considered when scheduling an audit.
  - NOTE 2: FSC and ASI reserve the right to request higher surveillance frequencies from certification bodies for certain geographical areas or certification services that are deemed "challenging" or "high risk" as the result of an internal risk assessment.
- 4.7.2 The certification body shall specify criteria and conditions for unannounced or short notice surveillance audits in their documented procedures.

Stakeholders have suggested requiring that unannounced or short notice audits shall be systematically used as a tool, e.g. requiring that one audit per certification cycle is conducted as an unannounced or short notice audit. However GA Motion 31 on this was rejected at the General Assembly 2014.

ISO 17021 specifies that such audits may be necessary for certification bodies to "investigate complaints or in response to changes, or as follow up on suspended clients".

There may be a need for short notice audits in some circumstances based on risk. Rather than leaving it entirely up to certification bodies to specify criteria and conditions FSC could provide further specification.

What do you think?

4.7.3 The certification body shall assign one (1) or more persons to make the certification decision to continue, suspend or withdraw certification based on information collected from surveillance activities and their review.

NOTE: The qualification requirements specified in Section 3.1 also apply to decisions of maintaining certification.

4.7.4 The occurrence of five (5) or more major nonconformities in a surveillance audit shall be considered as a breakdown of the clients' management system and the certificate shall be suspended within ten (10) business days of the formal presentation of CARs to the client. The maximum period that a certificate may remain suspended is twelve (12) months. After this period, the certificate shall be withdrawn, unless all major nonconformities have been successfully closed.

NOTE: Audits to determine close-out of nonconformities cannot substitute annual surveillance audits as per Clause 4.7.1.

4.7.5 The certification body shall record the certification decision to maintain the certificate for each surveillance evaluation.

#### 4.8 Changes affecting certification

- 4.8.1 The certification body shall inform all clients of changes to FSC certification requirements or its own procedures or requirements, within thirty (30) days that such changes are approved by the approval body.
- 4.8.2 The certification agreement between the certification body and the client shall provide the certification body and FSC with clear and explicit rights to revise the requirements of certification within the period of validity of the certificate, including the revision of costs and fees.
- 4.8.3 Clients that were certified prior to the date of approval of an applicable FSC standard shall conform with the requirements of the new FSC approved standard in accordance with the 'standards effective date' specified in the new standard.
- 4.8.4 The certification body shall consider other changes and circumstances affecting certification, including changes initiated by the client, and shall decide upon the appropriate action.

NOTE: Circumstances affecting certification are e.g. armed conflicts or epidemics that hinder a certification body in implementing their accredited system in order to confirm the validity of a certificate.

- 4.8.5 The actions to implement changes or addressing circumstances affecting certification shall include, if required, the following (NEW):
  - a) evaluation (see Section 4.3);
  - a) audit review (see Section 4.4);
  - b) certification decision (see Section 4.5);
  - c) issuance of revised formal certificates (see 4.6) to extend or reduce the scope of certification:
  - d) issuance of certification documentation of revised surveillance activities.

These actions shall be completed in accordance with applicable parts of Sections 4.3, 4.4, 4.5, 4.6 and 4.8. Records (see Section 2.4) shall include the rationale for excluding any of the above activities.

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Annex 1 Competency scheme for auditors and lead auditors

#### Stakeholder consultation note:

This Annex was prepared by Stephan Clauss, Training Manager FSC, based on input by the Expert Advisory Group for developing an Auditor Training Framework.

#### 1. Auditors and lead auditors

## Stakeholder consultation note (for information): lead auditor and auditor (terminology and competencies)

It seems that there is a lack of clarity with the definition of and inconsistency of use with the titles "lead auditor" and "auditor" across CBs and the FSC system. A glossary of relevant terminology in the revised version of the STD and the below specification should help with this. The main difference between auditor and a lead auditor is his/her additional professional experience, the ability to lead an audit and the team and the in-depth knowledge of the processes in the CB, the lead auditor is working for.

A person who is competent in other areas that are relevant to mainly FM evaluations such as HCV or social issues is therefore a "technical expert" and not an auditor according to the definition of this STD. Therefore, the below table does not apply to technical experts.

The competency scheme applies to auditors and lead auditors whereas **lead auditors** are expected to <u>additionally</u> fulfil the following requirements:

- Proven professional experience as an auditor in the respective field;
- At least three (3) complete third party audits in the last two (2) years of professional experience under the supervision of a qualified lead auditor, whereas one (1) of these three (3) audits must have been a witness audit;
- Ability to manage the audit process and the audit team (including but not limited to making most effective use of team resources, managing the team working relationship, external team representation during audit process, management of stakeholder engagement including prevention or resolution of conflicts – as necessary):
- In-depth knowledge of the processes and procedures of the certification body that the evaluation is hosted by.

## 2. Overview of required initial qualification and competencies

# Stakeholder consultation note (information): (CW – related to FM or COC evaluations)

The old version of this STD lists the requirements for auditors evaluating FM, COC and CW. There are different opinions whether there is a need to list the requirements for FM, COC and CW separately. The evaluation of CW requirements applicable at the forest level requires knowledge relevant for FM certification (the only real difference exists between knowledge about the contents of CW-FM and FM standards, but to evaluate CW requirements at the forest level, FM expertise is needed) . Please also refer to the standard interpretation on auditor qualification published on February 5<sup>th</sup>, 2014.

The following scenarios exist:

- 1. CW within FM: a MU is evaluated for CW. The responsible auditor is not just competent with CW but needs to be knowledgeable on the whole FM scope to be able to assess the MU appropriately.
- CW within COC, scenario 1: The wood mixed is sourced as FSC Controlled Wood (which means it has already been evaluated against CW requirements). Therefore, this material is no longer covered by the scope of CW standards (according to the revised

- standards) and the COC auditor only needs to be competent on FSC-STD-40-004 and other relevant COC standards.
- 3. CW within COC, scenario 2: the wood mixed comes from a source which requires the applicant/CH to implement risk mitigation according to FSC-STD-40-005 for specified risk areas determined in existing FSC risk assessments (applies only for CHs sourcing from specified risk areas and not conducting risk assessments). In this case the COC audit team needs to include an expert on FM/CW, who is able to evaluate relevance and effectiveness of risk mitigation means (that may require field verification at forest level) thus an FM auditor.
- 4. CW within COC, scenario 3: the wood mixed comes from a source which requires the applicant/CH to implement FSC-STD-40-005 and a CH is performing a risk assessment and developing/implementing risk mitigation measures (for specified risk areas). In this case the COC audit team needs to include an expert on FM/CW in order to evaluate contents of the risk assessment and risk mitigation as per Scenario 2 thus an FM auditor.

The revised listing of qualification and competencies requirements would therefore not be a fundamental change but rather an integration of CW in FM or COC as it is relevant to these two kinds of evaluations. Please also refer to the above mentioned STD interpretation of 05. February 2014 (

Table 1. Forest Management and Controlled Wood				
Education and work experience:	<ol> <li>Tertiary qualification (university degree) in a discipline relevant to the evaluation (e.g. ecology, forestry, sociology, economics, anthropology); and</li> <li>Five (5) years of professional experience (e.g. forest management, consultancy, research) in a discipline relevant to the evaluation (e.g. ecology, forestry, sociology, economics, anthropology);</li> <li>Secondary education with specialization in forestry OR environment OR social and labour issues OR economics; and</li> <li>Ten (10) years professional experience (e.g. forest management, consultancy, research) in a discipline relevant to the evaluation (e.g. ecology, forestry, sociology, economics, anthropology).</li> </ol>			
Auditor training and experience:	3. Certificate in ISO 9001, ISO 14001, ISO 19011 or OHSAS 18001; and			
	<ol> <li>Successful participation in an introductory training on FSC FM (including the CW) as determined by requirements listed under Clause 3.1.4.2;</li> </ol>			
	5. At least four (4) complete third-party scope specific audits (FM), in the last three (3) years, under the supervision of a lead auditor with one (1) of the audits being a witness audit as an active auditor.			

#### Stakeholder consultation note (proposal):

The revised STD contains some changes in the requirements of which the most important are the following and should be carefully considered during stakeholder consultation:

1) COC requirements for qualification (university degree) and education (high school)

The current version of the STD does not include any requirements about the educational background of the COC auditor. Thus – theoretically – a person who has not even finished high school could become a COC auditor.

It makes sense to be more specific about this. The suggestion is to require:

- At least a secondary education (high school) and
- One (1) year of full-time work experience in the area relevant to the evaluation.

The latter is to ensure that the auditor understands the process and procedures of the applicants'/ CH COC industry sector.

Further the suggestion is that one (1) year of full time work experience in the relevant area can be replaced by four (4) supervised audits. (see Sections 2.2. and 3.2)

## 2) Requirements of # of audits to attend in order to qualify as an auditor: FM:

The suggestion is to increase the number of audits from three (3) to four (4) audits. Further the suggestion is that an auditor trainee should have the main responsibility for one of these four (4) audits – under the supervision of a lead auditor.

#### COC:

The suggestion is to increase the number of audits from three (3) to four (4) audits. Further the suggestion is that an auditor trainee should have the main responsibility for one of these four (4) audits – under the supervision of a lead auditor.

Do you agree to the proposals as specified under 1) and 2)?

Table 2. Chain of Custody and Controlled Wood			
Education and work	Secondary education; and		
experience:	2. One (1) year of full-time work experience in an area relevant to the evaluation.		
Auditor Training and experience:	3. Certificate in <i>ISO 9001, ISO 14001, ISO 19011 or OHSAS 18001</i> ; and		
	4. Successful participation in an introductory training on FSC COC as determined by requirements listed under Clause 3.1.4.2		
	5. At least four (4) complete third-party FSC COC audits, in the last three (3) years, under the supervision of a lead auditor with one (1) of the audits being a witness audit as an active auditor.		

#### 3. The FSC competency scheme for auditors

The below competency scheme lists the general required competencies and the specific required competencies for forest management or chain of custody. The scheme is subdivided in four (4) main sections in which auditors need to be qualified in:

## 1. Audit principles, procedures and techniques

This section refers to general auditing competencies which are common across all management system audits.

The competencies listed here are the basic requirements for auditors of all scopes.

#### 2. Knowledge of the specific FSC standards

This section refers to knowledge needed to audit according to a specific FSC scope. It is required to know all scope specific normative documents, related non-normative documents as well as other relevant information.

## 3. Terminology, principles and practices related to the respective scope

This section refers to technical and specialist knowledge related to certain characteristics (environmental, social, economic or industrial) within the respective scope.

### 4. Personal attributes

Personal attributes are individual characteristics or qualities that affect a person's ability to perform a specific task or fulfill a certain function. Individuals possessing one or more of the below listed characteristics are more likely to become and be good auditors. While these attributes can partly be trained and/or learnt they are primarily inherent in a person's character trait (adapted from definitions taken from ISO 17024 and the ISEAL Assurance Code.)

**Table 3. Competency scheme** 

1. Audit principi	<ol> <li>Prepare and plan the audit;</li> <li>Conduct the audit within</li> </ol>	1. Possession of a formal	
111	audit;	1. Possession of a formal	14 A 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Requirements for all scopes	<ol> <li>Conduct the audit within the agreed timeframe;</li> <li>Prioritize and focus audit on issues of significance;</li> <li>Apply sampling techniques appropriately;</li> <li>Understand and assess risks associated with audits;</li> <li>Communicate with audited personnel;</li> <li>Collect evidence using adequate methods: interviews, observations, review of documentation and data, sampling techniques;</li> <li>Analyse, verify and consolidate audit evidence and generate audit findings;</li> <li>Prepare written audit reports, including any nonconformities identified;</li> <li>Carry out stakeholder engagement, if applicable.</li> </ol>	certificate in one of the following courses (i.e. certificates accepted by auditor registration schemes such as IRCA or RABQSA/Exemplar Global): ISO 9001 ISO 14001 OHSAS 18001  OR  1. ISO 19011: success completion (exam and certificate) of a three (3)-day ISO 19011 course provided by a formally qualified QMS, EMS or OHSAS lead auditor;  AND  2. Participation in the same four (4) audits in the respective scope as listed in Sections 2.1 (FM) and 2.2 (COC)	<ol> <li>At least three (3) audits/ audit days every year;</li> <li>Witness audit: one (1) witness audit every three (3) years, with a (positive) supervision report written by the supervising lead auditor;</li> <li>Results from ongoing monitoring of all auditors and performance evaluation every three (3) years.</li> </ol>
2. Knowledge of the specific FSC standards			
(including	<ol> <li>Know the history and the objectives of FSC;</li> <li>Understand the FSC certification system;</li> <li>Know all relevant FSC FM, CW, and other</li> </ol>	Successful participation     in a FSC FM     introduction training     (including CW) as     determined by the     procedure outlined	<ul> <li>1. Annual ongoing training on FSC dependent on:</li> <li>• relevant changes in the FSC system due to</li> </ul>

Criteria and indicators	Competence criteria	Means of verification of competence - to ensure	Means of verification of competence - to
Applicable scopes		initial qualification	ensure maintenance of qualification
for CW)	relevant FSC normative documents, including accreditation procedures, directives, advice notes and interpretations – general and local;  4. Understand:  • the relationship between FSC's International Generic Indicators (IGIS) and FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship;  • the procedures for evaluation of forest management enterprises against the locally adapted Forest Stewardship Standard;  5. Be capable of:  • analysing and validating the certification scope, including applicable standard requirements;  • interpreting the requirements;  • interpreting the requirements;  • analysing the adequacy of the audit programme;  • report writing in conformity with the FSC requirements and any additional requirements of the certification body;  • multi-site, group or large scale certification;  6. Know the requirements for correct use of the FSC trademarks both on-and off- product.	under Clause 3.1.4.2 concluding with an exam and certificate;  2. Participation in at least four (4) complete third- party FSC FM audits, in the last three (3) years and under the supervision of a lead auditor. Of these four audits:  at least one (1) shall be a main or re-evaluation;  at least one (1) shall be a surveillance audit;  the last shall be a witness audit as an active auditor, with a (positive) supervision report written by the supervisor auditor.	revision of normative documents, the publication of new normative documents or other relevant amendments;  • results of the individual monitoring, feedback and/or evaluation process;  2. At least three (3) audits/days every year;  3. Witness audit: one (1) witness audit every three (3) years, with a (positive) supervision report written by the supervising lead auditor.
2.2. Requirements	Know the history and objectives of FSC;	Successful participation in a FSC COC	Annual ongoing training on FSC
for COC	2. Understand the FSC	introduction training	dependent on:
(including	certification system;	(including CW) as	relevant changes
relevant	3. Know all relevant FSC	determined by the	in the FSC
requirements	COC, and other relevant	procedure outlined	system due to

Criteria and indicators  Applicable scopes	Competence criteria	Means of verification of competence - to ensure initial qualification	Means of verification of competence - to ensure maintenance of qualification		
for CW)	FSC normative documents (specifically FSC-STD-40-004, FSC-STD-40-005, FSC-STD-40-006 and FSC-STD-40-007), including procedures, directives, advice notes and interpretations;  4. Be capable of:  • analysing and validating the certification scope, including applicable product groups, sites and standard requirements;  • interpreting the requirements, assessing their application and allocating findings to applicable requirements;  • analysing the adequacy of the audit programme;  • report writing in conformity with the FSC requirements and any additional requirements of the certification body;  • multi-site, group or large scale certification.  5. Be knowable of the requirements for correct use of the FSC trademarks both on- and off- product.	under Clause 3.1.4.2 and concluding with an exam and certificate;  3. Participation in at least four (4) complete third- party FSC COC audits, in the last three (3) years and under the supervision of a lead auditor. Of these four (4) audits:  • at least one (1) shall be a main or re-evaluation; • at least one (1) shall be a surveillance audit; • the last shall be a witness audit as an active auditor, with a (positive) supervision report written by the supervisor auditor.	revision of normative documents, the publication of new normative documents or other relevant amendments; • results of the individual monitoring, feedback and/or evaluation process; 5. At least three (3) audits/days every year; 6. Witness audit: one (1) witness audit every three (3) years, with a (positive) supervision report written by the witness auditor.		
3. Terminology,	3. Terminology, principles and practices related to the respective scope				
3.1. Requirements for FM	<ul> <li>1. Be competent in at least one of the following areas:</li> <li>• forest management issues (including relevant legal and economic issues);</li> <li>• environmental issues (as applied to natural; resource management)</li> <li>• social, cultural and</li> </ul>	<ol> <li>Tertiary qualification (university degree) in a discipline relevant to the evaluation (e.g. ecology, forestry, sociology, economics, anthropology);</li> <li>Five (5) years of professional experience (e.g. forest management,</li> </ol>	<ol> <li>Minimum nº audits/ year: same as Section 2, as applicable;</li> <li>Witness audit: same as Section 2, as applicable;</li> <li>Results from on- going monitoring of all auditors and performance evaluation every</li> </ol>		

Criteria and indicators  Applicable scopes	Competence criteria	Means of verification of competence - to ensure initial qualification	Means of verification of competence - to ensure maintenance of qualification
	NOTE: Individual auditors shall be qualified for one or more of the listed issues; audit teams will need to include all these competencies – if relevant for the area audited, but this can be achieved by selecting one auditor qualified in all areas, or three (3) auditors, each qualified in one of the above areas (for example). For further details see Annex 2 "Audit teams".	in a discipline relevant to the evaluation (e.g. ecology, forestry, sociology, economics, anthropology);  OR  1. Secondary education with specialization in forestry OR environment OR social and labour issues OR economics;  2. Ten (10) years professional experience (e.g. forest management, consultancy, research) in a discipline relevant to the evaluation (e.g. ecology, forestry, sociology, economics, anthropology).	three (3) years.
3.2. Requirements for COC	<ol> <li>Know the general terminology of the business sector;</li> <li>Know the practices, products and technologies of the business sector, including material flow, measurements and control methods;</li> <li>Know the relevant aspects of the business sector and their implications for the certification of specific products;</li> <li>Know the measures to avoid purchasing raw materials from nonspecified risk sources, including risk assessment methods and indicators;</li> <li>Know aspects in business administration (book keeping, shipping, logistics, warehouses) in relation of product flow</li> </ol>	<ol> <li>Secondary education;</li> <li>One (1) year of full-time work experience in an area relevant to the evaluation.</li> <li>NOTE: one (1) year of full time work experience in a relevant area to the evaluation may be replaced by four (4) additional (see Section 2.2) supervised audits. Thus, a candidate could be qualified after carrying out eight (8) supervised audits in total.</li> </ol>	<ol> <li>Minimum nº audits/ year: same as Section 2, as applicable;</li> <li>Witness audit: same as Section 2, as applicable;</li> <li>Results from ongoing monitoring of all auditors and performance evaluation every three (3) years</li> </ol>

Criteria and indicators  Applicable scopes	Competence criteria	Means of verification of competence - to ensure initial qualification	Means of verification of competence - to ensure maintenance of qualification
	control; 6. Know the requirements of international timber regulations (such as EUTR).		
4. Personal attri	ibutes		
4. Personal attri		<ol> <li>Same as Section 2, as applicable;</li> <li>Screening process during selection of new auditors (cf. Clause 3.1.5 b)</li> </ol>	1. Witness audit: one (1) witness audit every three (3) years, with a (positive) supervision report written by the witness auditor; 2. Results from on- going monitoring of all auditors and performance evaluation every three (3) years.
	<ul> <li>professional, i.e. exhibits a courteous, conscientious and generally business-</li> </ul>		

Criteria and indicators  Applicable scopes	Competence criteria	Means of verification of competence - to ensure initial qualification	Means of verification of competence - to ensure maintenance of qualification
	like demeanour in the workplace;		
	<ul> <li>morally courageous, i.e.         willing to act responsibly         and ethically even though         these actions may not         always be popular and         may sometimes result in         disagreement or         confrontation;</li> </ul>		
	<ul> <li>organised, i.e. exhibits effective time management, prioritisation, planning, and efficiency.</li> </ul>		

#### **Annex 2 Audit teams**

- 1.1 The certification body shall have a process for selecting and appointing the audit team, taking into account the competence needed to achieve the objectives of the audit.
- 1.2 An audit team shall always include:
- 1.2.1 A qualified lead auditor for the scope of the audit: forest management, chain of custody or controlled wood at MU level;
  - NOTE: Controlled wood at MU level audits include controlled wood chain of custody audits at MU level and controlled wood forest management audits.
- 1.2.2 A leader of the audit team, who may be the lead auditor or a different team member;
- 1.2.3 At least one (1) team member who is:
  - a) fluent in the main language of the area in which the audit takes place; or
  - b) a designated independent interpreter, who is not an employee or consultant of the company under evaluation; or
  - c) a team member who is fluent in the corporate language, if the company provides a written declaration that confirms that all of the following criteria are met:
    - i. all relevant records and procedures relating to FSC requirements are written and understood in the corporate language; and
    - ii. all management staff and those with FSC responsibilities can communicate fluently in the corporate language.
- 1.2.4 In the case of smaller or less complex audits the 'team' may consist of a single qualified lead auditor who is then also the leader of the 'team'.
- 1.2.5 For forest management audits: in addition to the requirements specified in Annex 2, Section 1.2 (above), a forest management audit team shall include auditor(s) with the experience and qualifications to audit all aspects of the FSC Principles and Criteria, taking account of the scale and complexity of the area to be assessed. Key considerations for the selection of auditors for an audit shall include experience and qualifications in relation to relevant forest management, social, environmental and economic issues (see Box 1 below for further details).
- 1.2.6 For forest management audits and controlled wood audits at MU level: at least one(1) team member who is resident in the country in which the audit takes place or in a nearby country with similar forest conditions.
- 1.2.7 For controlled wood audits at MU level:
  - a. at least one (1) team member with the experience and qualifications to audit relevant aspects of the controlled wood standard taking account of the scale and complexity of the area to be assessed. Key considerations for the selection of auditors for an audit shall include experience and qualifications in relation to the controlled wood categories being audited;

- b. at least one (1) team member shall be a qualified forest management auditor.
- 1.2.8 For chain of custody audits: at least one (1) team member who has knowledge of the critical characteristics of the operational processes under evaluation.

## Box 1: Key considerations for selection of audit team members for forest management audits (refers to lead auditors, auditors and technical experts)

## Forest management issues:

The audit team shall include members with experience in forest management of the size and complexity under evaluation. For example, if a large plantation is being audited, the team should include members who have themselves managed operations of a similar type or who have professional experience, for example as paid consultants or advisors to similar kinds of operations.

#### Social issues:

If it is likely that forest management has significant interactions with neighboring communities, raising questions related to indigenous or community rights and tenure issues, or has social High Conservation Values (HCV), then the team shall include expert(s) who have knowledge of these issues, appropriate language/dialect, and experience of interacting with indigenous peoples and communities in the region concerned. The team shall include members with knowledge and capacity to evaluate workers' rights such as health and safety aspects and application of employment legislation in the region.

#### **Environmental issues:**

The audit team shall include members with the experience and knowledge to audit the forest management enterprise's process for identifying HCVs and interviewing stakeholders on the presence of ecological HCVs in the area to be evaluated, as well other environmental issues that are likely to be of importance during the audit. Qualification or professional experience in the area of forest ecology for the forest ecosystems under evaluation (whether natural or planted) is likely to be of key importance. General knowledge of the management of rare or endangered species that are likely to be present in the forest area, or knowledge about key environmental impacts such as those on hydrology or soils may also be required.

#### **Economic issues:**

The audit team shall include members with knowledge of the economic implications of forest management decisions in the country concerned (e.g., the economic implications of changes to silvicultural systems, set aside areas, etc.).