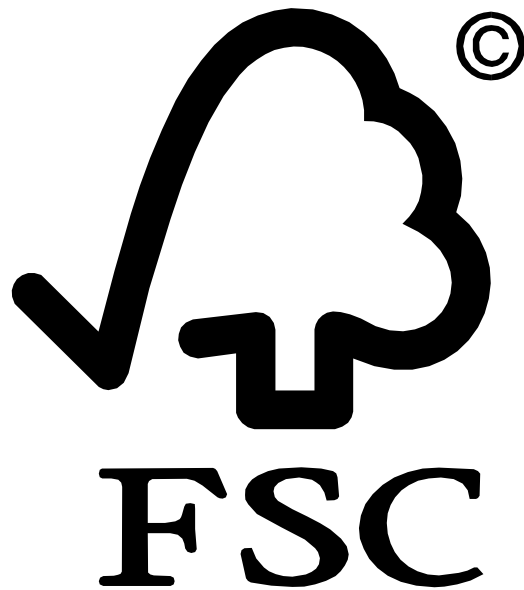


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# **FSC GUIDELINES FOR CERTIFICATION BODIES**

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Edited M.G. Wenban-Smith

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# FSC Guidelines for Certification Bodies

## June 1998

### Introduction

#### 1 Guidelines for certification bodies

- 1.1\_ This document presents guidelines for certification bodies regarding FSC policy on a number of different subjects of interest.
- 1.2 The guidelines are designed to explain the FSC Secretariat's position on these subjects, in a format which is readily accessible to certification bodies, FSC members, and other interested parties.
- 1.3 The guidelines presented are designed to supplement the more specific and technical requirements of FSC accreditation, as presented in the FSC Accreditation Manual. They have been developed on the basis of experience acquired by FSC and certification bodies over the first three years of FSC operation.
- 1.4 These guidelines replace previous positions presented from time to time in statements and position papers made by the FSC Secretariat. These guidelines represent the current position of the FSC Secretariat, in all cases.
- 1.5 The guidelines are under continual review, and may be revised as the result of further experience. The Secretariat recognises that the current guidelines represent a general viewpoint which may require further development or explanation in order to be applied directly to a specific situation. The Secretariat's aim is to ensure that FSC can respond quickly and effectively to new situations that require policy guidance, and ensure that all certification bodies are clear about the Secretariat's position.

#### 2 Organisation of the guidelines

- 2.1 The guidelines are divided into four Parts.
  - 2.1.1 **Part 1** deals with subjects related to **accreditation of certification bodies**.
  - 2.1.2 **Part 2** deals with subjects related to **certification of forest stewardship**.
  - 2.1.3 **Part 3** deals with subjects related to **certification of chain of custody**.
  - 2.1.4 **Part 4** deals with subjects related to **certification reports**.
- 2.2 Within each Part of the guidelines, subjects are numbered consecutively. New subjects will be added as they arise. There is no particular organisation of Subjects

within each Part.

- 2.3 Each page is numbered with the Part and Subject number, but not with a page number. This should allow subjects to be updated, and new subjects to be added, without disturbing the general layout.
- 2.4 Each subject is dated. If a subject is referred to in correspondence with FSC, the date should be quoted, to avoid confusion.

### **3 Drafting**

- 3.1 This edition of the 'FSC Guidelines for Certification Bodies' was prepared by M.G.Wenban-Smith for the FSC Secretariat in June 1998.
- 3.2 Comments and proposals for revisions or new subjects should be sent to the FSC Secretariat, at the address on the front of the document.

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# FSC Guidelines for Certification Bodies

## June 1998

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**PART 1:**

**Accreditation**



# FSC Guidelines for Certification Bodies

## Part 1: Accreditation

### Subject 1.1: Certification bodies with non-FSC certification programmes

Updated: June 1998

#### 1 Background

- 1.1 The scope of FSC accreditation is limited to certification of forest management for compliance with the *FSC P&C*, and certification of the chain of custody of products from such certified forests.
- 1.2 Many FSC-accredited certification bodies also operate additional certification programmes that are outside the scope of FSC accreditation.

#### 2 FSC Position

- 2.1 FSC promotes forest management which complies with the *FSC P&C*. FSC uses its name and logo to endorse and support certification schemes which meet this requirement.
- 2.2 Certification bodies also have a public and professional identity associated with their name and/or logo. This identity is given market value and public credibility by its association with FSC's name and logo, through FSC accreditation.
- 2.3 A primary objective of FSC policy is to reduce public confusion regarding environmental claims relating to forest management. Such confusion would be created if FSC-accredited certification bodies' names or logos become associated with forest management which does not comply with the *FSC P&C*.
- 2.4 FSC-accredited certification bodies may not, therefore, operate certification schemes or issue certificates (or equivalent public statements) regarding forest management that does not comply with the *FSC P&C*.
- 2.5 However, FSC-accredited certification bodies *may* carry out confidential, internal forest management audits for forest management enterprises, even where their policy is not based on compliance with the *FSC P&C*. In such case the certification body must have strict, legally binding wording in the contract to undertake the work, to ensure that no public claims or endorsements can be made in association with the certification body's name or logo as a result of these internal audits. The certification body must ensure that no statements are made that imply endorsement of the general standard of forest management unless the management is certified as meeting the *FSC P&C*. FSC reserves the right to withdraw accreditation if, in the sole opinion of FSC, reports or statements issued by the certification body or its clients are responsible for confusion or misrepresentation.
- 2.6 Standards that exceed the FSC Principles and Criteria.
  - 2.6.1 FSC-accredited certification bodies must implement 'generic' forest certification standards for use in regions in which there are not yet formally endorsed Forest

Stewardship Standards. Such generic standards have been evaluated by FSC against the *FSC P&C*, and judged to comply fully with them.

- 2.6.2 Certification bodies' generic standards usually exceed the minimum requirements of the *FSC P&C* in some areas. Generic standards that exceed the *FSC P&C* are fully compatible with the *FSC P&C*, and may be used for carrying out forest evaluation and certification. FSC does not require such standards to be 'lowered' to the minimum requirements of the *FSC P&C*.
  - 2.6.3 Certification bodies may also carry out evaluations and issue certificates using a combination of their own generic standards, together with additional standards specified by the client. In such cases a certificate may be issued, and associated public statements may be made, only when the client meets the FSC endorsed standard.
  - 2.6.4 These considerations apply to certification bodies implementing 'organic' forestry programmes, ISO 14000 programmes, 'old-growth free' programmes, etc..
- 2.7 ISO 14000
- 2.7.1 Many forest management enterprises are now using FSC and ISO based certification systems together: ISO14000 certification ensures that an environmental management system (EMS) is in place and operating; FSC provides external, independent performance criteria and a product label.
  - 2.7.2 FSC considers that EMS certification according to the ISO14000 series or equivalent standards is compatible with and complementary to the FSC system for forest management certification. FSC accreditation is fully compatible with accreditation to provide EMS certification (e.g. against the ISO14000 series or the equivalent Eco-Management and Auditing Scheme (EMAS) standards).
  - 2.7.3 The objective of certification bodies providing both services should be to ensure that the requirements of both systems are met, whilst avoiding duplication of effort.
  - 2.7.4 The policies regarding non-FSC forest certification specified in paragraphs 2.1 - 2.6 above still apply. A company which complies with the requirements for ISO14000 certification, but does not comply with the FSC P&C may make no public claims that imply endorsement by the certification body of its general standard of forest management.
  - 2.7.5 The issue of an ISO14000 certificate to a forest management enterprise is a public claim relating to the enterprise's environmental policy and practices, including its forest management policy. Clearly this may imply endorsement of the general standard of forest management and lead to public confusion. FSC-accredited certification bodies may not therefore issue ISO14000 certificates to companies unless they also comply with the FSC P&C.

## 2.8 Recycled/reclaimed wood certification

- 2.8.1 FSC-accredited certification bodies may carry out certification of recycled or reclaimed wood content.
- 2.8.2 In such cases FSC's main concern is to ensure that there is no public confusion as to whether the certified product is endorsed under the FSC programme or not. The FSC name and Logos may not be used in association with such programmes, and literature must not imply that the programmes are endorsed by FSC. The certification body must ensure that Logos and claims associated with products certified under such programmes are clearly distinct from any Logos or claims associated with FSC-accredited programmes.
- 2.8.3 FSC reserves the right to insist that Logos and claims that are, in the sole opinion of FSC, confusing with FSC-accredited programmes, be changed at the expense of the certification body.
- 2.8.4 Reclaimed and recycled materials may be included in FSC labelled products when those products meet the requirements for 'percentage-based claims', and when the content of the products is clearly identified on the product label.

## 2.9 Non timber forest product (NTFP) certification

- 2.9.1 Certification bodies may certify forests for the production of Non Timber Forest Products (NTFPs). In such cases the forest management must comply fully with the FSC Principles and Criteria, and special consideration must be given to the management for the particular NTFP. Further details are given in Part 2 Subject 2.8 of these guidelines.

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# **FSC Guidelines for Certification Bodies**

## **Part 1: Accreditation**

### **Subject 1.2: Certification Partnerships**

**Updated: June 1998**

#### **1 Background**

- 1.1 The geographic scope of FSC accreditation is usually worldwide, and for all forest types. FSC-accredited certification bodies usually have core personnel with professional forestry experience. This core is supplemented by personnel taken on for particular certification evaluations on a consultancy basis. Some FSC-accredited certification bodies are members of multinational groups of companies, and have formal company policies for cooperation. Other FSC-accredited certification bodies have entered into formal partnerships to work together on certification in some parts of the world. For some certification bodies these partnerships are considered a part of the training and development role of the organisation.
- 1.2 FSC signs an accreditation contract with a single legal entity. FSC accreditation applies only to this entity. This raises a number of issues regarding the relationship between FSC, and the certification bodies' partner organisations.

#### **2 FSC Position**

- 2.1 FSC's position is based on the accreditation contract. The accreditation contract defines the relationship between FSC and the FSC-accredited certification body. FSC has no similar contractual relationship with the certification body's partner organisations.
- 2.2 FSC's accreditation contract is based upon the certification body's agreement to implement its accredited, documented certification system. The certification body must therefore document any arrangements for working with consultants or partner organisations, and these arrangements will be assessed by FSC during the evaluation for accreditation. If arrangements are developed after accreditation, then FSC must be informed of the new arrangements, and will evaluate them to determine whether they compromise the basis on which accreditation was granted. FSC reserves the right to withdraw its accreditation if the arrangements are not satisfactory.
- 2.3 In general FSC considers it normal for certification bodies to work with consultants on evaluations. Specific requirements for the selection of personnel are specified in the FSC Accreditation Manual, Part 3.1 Section 11. FSC considers agreements to work with partner organisations as an extension of the arrangements to work with consultants. The accredited certification body is contractually obliged to ensure that its accredited certification system is fully implemented. FSC will in all cases hold the accredited certification body responsible for implementing its system, whether parts of the system are implemented by individual consultants to the certification body, or by partner organisations. Under no circumstances may an FSC-accredited certification body delegate responsibility for certification decisions,

nor may it delegate contractual responsibility for issuing a certificate or sublicensing the FSC Logo.

2.4 Partner organisations that have not signed an accreditation contract with FSC are not FSC-accredited. FSC considers that it is a responsibility of the accredited certification body to ensure that partner organisations do not make any claims for accredited status, or imply in any of their documentation that they are in fact accredited. FSC reserves the right to withdraw accreditation from a certification body whose partners imply that they hold accredited status through their association with an accredited certification body. FSC reserves the right to take legal action against such organisations as make incorrect claims to accredited status. Partner organisations do not have the right to use the FSC Logo on their stationery. Partner organisations may describe their services as being 'in association with [name of certification body], which is accredited by FSC'. Certification bodies that wish to enter into cooperative agreements with partner organisations are advised to develop wording in contracts or memoranda of understanding that define explicitly the claims that may and may not be used by the partner organisation with respect to the relationship with the accredited certification body, and with respect to the services offered.

2.5 Partner organisations are not obligated by the accreditation requirements specified in Paragraph 1.1, above. Partner organisations may, for example, offer non-FSC-accredited services, and may carry out certification evaluations to standards that do not comply with the FSC Principles and Criteria. Accredited certification bodies must ensure that such activities that do not meet FSC requirements are not associated with the name of the accredited certification body, and do not imply that they are in any way endorsed by the accredited certification body. FSC reserves the right to withdraw accreditation from a certification body if, in the sole opinion of FSC, the certification body is permitting its identity to be associated with activities that do not comply with FSC requirements for accreditation.

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# FSC Guidelines for Certification Bodies

## Part 1: Accreditation

### Subject 1.3: Consultancy Services

Updated: June 1998

#### **1 Background**

- 1.1 FSC-accredited certification is designed to be credible and independent. FSC-accredited certification is third-party certification. That is to say that the party providing the certified guarantee is independent from both the party making a claim (the forest manager, or supplier of forest products) and the party to whom the claim is being made (the public, or the buyer of forest products). Clearly it would create an unacceptable conflict of interest if the certification body was involved in providing the services that are to be certified. Such a conflict could arise if, for example, a certification body provided consultancy advice regarding forest management to a client, and then offered to evaluate the client's management for certification.
- 1.2 In order to avoid such potential conflicts some accreditation programmes prohibit certification bodies from providing any consultancy services. Some accreditation programmes further prohibit certification bodies from providing even informal advice regarding actions that may be taken by a client to meet certification requirements. Thus a certification body would be required to specify which elements of a standard had been failed by an applicant, but would not be permitted to offer any advice as to actions that might be taken to improve the practices in order to comply with the standard on re-evaluation.

#### **2 FSC Position**

- 2.1 FSC does not prohibit accredited certification bodies from offering some consultancy services to clients. This is for two main reasons. Firstly, in many countries expert forestry knowledge is scarce. FSC does not consider it appropriate to require the few organisations in those countries that may consider FSC accreditation to have to forgo all consultancy work, in order to be FSC-accredited. FSC considers that this would create an unnecessary barrier to accreditation.
- 2.2 Secondly, FSC considers it a positive aspect of certification work that the expert consultants who carry out the evaluation work for certification bodies are able to offer informal advice to the forest managers under evaluation, with regard to how their management may be improved. Many forest managers have great difficulty acquiring access to forestry expertise, and appreciate the possibility of receiving advice from other professionals as to how they can improve their forest stewardship. FSC does not consider it appropriate to prohibit certification evaluation team members from offering such informal advice.
- 2.3 FSC recognises that if certification bodies are permitted to offer consultancy advice, they must also operate appropriate procedures for identifying and avoiding potential conflicts of interest, at both the institutional and personal level.
- 2.4 Certification bodies that offer consultancy services must therefore differentiate clearly and

institutionally between their consultancy and certification services, and operate formal policies and procedures for avoiding conflicts of interest.

- 2.5 FSC minimum requirements for the identification and avoidance of potential conflicts of interest by certification bodies are specified in the FSC Accreditation Manual, Part 3.1 Section 4. FSC evaluates these policies and procedures at the time of accreditation.
- 2.6 The basis of FSC review of such policies is that all potential conflicts of interest, however slight, should be declared and recorded. All such declarations must be reviewed by a responsible member of personnel. All actions taken to resolve potential conflicts must be recorded.

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# FSC Guidelines for Certification Bodies

## Part 1: Accreditation

### Subject 1.4: Reciprocity

Updated: June 1998

#### 1 Background

- 1.1 All accredited certification programs have been judged to comply with the FSC Principles and Criteria, and have been judged to be procedurally adequate.
- 1.2 The FSC Statutes, Appendix A: Section 5 states that “In the absence of exceptional, case-specific circumstances to the contrary, it is expected that certifications issued by an accredited certification body are mutually recognised by other accredited certification bodies”.
- 1.3 This basic position has a number of implications.

#### 2 FSC Position

##### 2.1 Reciprocal recognition of certificates

- 2.1.1 Accredited certification bodies must recognise both forest management and chain of custody certificates issued by other FSC-accredited certification bodies, unless there are specific concerns about the certificate in question.
- 2.1.2 If a certification body has concerns about specific certificates issued by another accredited certification body then the certification body must submit a written explanation of these concerns to the FSC Secretariat. The FSC Secretariat will treat the concerns in total confidence, and, as for any concerns brought to the attention of the Secretariat, will endeavour to determine whether there is a non compliance with any FSC requirements. Accredited certification bodies may not make their concerns public before bringing them to the attention of the FSC Secretariat and allowing the Secretariat the opportunity to investigate.

##### 2.2 Implications for use of the FSC Logo

- 2.2.1 All accredited certification bodies have the right to authorise use of the FSC Logo by their certificate holders.
- 2.2.2 A certificate holder can therefore move from one certification body to another, without compromising in any way its rights to use the FSC Logo.
- 2.2.3 A chain of custody certificate holder may buy certified materials from companies holding chain of custody certificates from any other FSC-accredited certification bodies, and from any number of companies certified by different FSC-accredited certification bodies, and may mix these certified materials in order to produce certified products. FSC-accredited certification bodies may not treat products

certified by other FSC-accredited certification bodies differently to products certified by themselves, for the purpose of authorising use of the FSC Logo.

### 2.3 Implications for use of certification bodies' logos.

2.3.1 All certification bodies also have the right to authorise use of their own logos by their certificate holders. However, accredited certification bodies do not have the right to authorise use of each others logos by their certificate holders. A chain of custody certificate holder that buys materials from forests or suppliers holding chain of custody certificates from a number of different companies has the right to authorise use of their own logo on the certified products, but does not have the right to authorise use of any other certification body's logo, unless this has been agreed bilaterally with the other certification body.

2.3.2 Standards of fairness and equity should guide decisions as to placement of certification bodies' logos in such situations. Unresolved issues between accredited certification bodies over the use and recognition of marks and stamps should be brought to the attention of the FSC Secretariat. If resolution cannot be achieved the FSC Executive Director will bring the matter before the Board of Directors, with recommendations at the next regularly scheduled Board meeting. The Board's adjudication of the issue shall be deemed final.

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# FSC Guidelines for Certification Bodies

## Part 1: Accreditation

### Subject 1.5: Revision of FSC accreditation requirements

Updated: June 1998

#### 1 Background

- 1.1 FSC's accreditation requirements evolved rapidly during the first years of FSC's operation. Equally certification bodies' own certification systems have evolved rapidly as field experience has been gained. FSC regularly informs and consults with certification bodies and other parties regarding impending changes to accreditation requirements.
- 1.2 In addition, certification bodies and FSC regularly encounter new situations which may set precedents, and require fast advice on appropriate policy. The FSC Secretariat has endeavoured to respond to individual certification bodies' requests for advice, and to keep all certification bodies informed as to policy developments. Nevertheless the development of policy has been piecemeal, and there has not been a single reference source to which certification bodies may confidently refer for the latest information.

#### 2 FSC Position

- 2.1 The first edition of the FSC Accreditation Manual was published in January 1998. The Accreditation Manual contains the specific technical requirements for accreditation. The Accreditation Manual is under continuous review, and will be periodically revised. The FSC Secretariat is currently developing formal procedures to ensure that certification bodies are fully involved in discussions regarding proposed changes to the Accreditation Manual.
- 2.2 Accredited certification bodies' documentation and procedures must normally be in full compliance with any new requirements specified in the FSC Accreditation Manual within twelve (12) months of the requirements being finalised and formally published.
- 2.3 The publication of the '*FSC Guidelines for Certification Bodies*' is designed to allow the development of more general policy guidelines that must be followed by certification bodies. The Secretariat will consult with certification bodies with regard to the development of policy, and add new guidelines as they are developed. The position presented in the '*FSC Guidelines for Certification Bodies*' represents the current position of the FSC Secretariat.
- 2.4 Accredited certification bodies are expected to comply with the policy guidelines presented in the '*Guidelines for Certification Bodies*' with immediate effect.

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# **FSC Guidelines for Certification Bodies**

## **Part 1: Accreditation**

### **Subject 1.6: Subcontractors to Accredited Certification Bodies**

**Updated: March 2000**

#### **1. Background**

- 1.1. During the 1998 Annual Conference, a discussion was held about the role and function of subcontractors to certification bodies. It was identified that these subcontractors include individuals and organizations which perform a wide range of services. These range from a single consultant who is retained to perform or assist in a single audit through and including companies which are contracted to perform all audits and monitoring in a specific country or region.
- 1.2. FSC is not opposed to the use of subcontractors by accredited certification bodies to provide services under their accredited system. The use of subcontractors can reduce the costs of providing certification services and can serve to increase the availability of trained professionals who can deliver certification services. FSC is concerned that these subcontracts be arranged in a manner which is consistent with the Accreditation Contract, Accreditation Manual and the Guidelines for Certification Bodies.
- 1.3. At present, almost all accredited certification bodies have made contractual agreements with third parties to be responsible for most or all of the certification body's activity within a certain territory. Subcontractors often carry out the evaluations, while the accredited certification bodies always makes the certification decision and are solely responsible for issuing all certificates. FSC has and continues to have several concerns about this practice. These concerns include the following.
- 1.4. Confusion about the status of the subcontractor. The responsibilities given to a subcontractor by the accredited certification bodies may cause the public and client to perceive that the subcontractor has the same accreditation status as the accredited certification body. As a consequence, the public may think that the subcontractor can offer the same services as an FSC accredited certification body. Subcontractors have already been known to offer or appear to offer FSC services independent of an accredited certification body -- actions such as these can be very confusing and misleading to potential clients.
- 1.5. Monitoring. When a certification body subcontracts the responsibility for monitoring a client to another organization without proper controls, FSC's own monitoring ability may, as a result, be adversely affected. If pertinent information about a client's ongoing compliance with FSC requirements is kept only in the subcontractors office, it would be difficult for FSC to conduct a monitoring visit to that client since FSC has no contractual relationship with the subcontractor.
- 1.6. Incomplete contracts between accredited certification bodies and subcontractors: Contracts are intended to define the relationship between the accredited certification

body and the subcontractor. A great variety of agreements made by the different certification bodies currently exist. FSC requirements stipulating use of the logo, for example, are often omitted from the agreement.

- 1.7. Membership in FSC by subcontractors who are also certification bodies: According to the FSC Statutes certification bodies are eligible for FSC membership only if they are accredited by or have applied for accreditation from FSC. This provision is currently applied to all bodies, including subcontractors to FSC accredited certification bodies. Certification bodies are defined by FSC as bodies which issue certificates under any program, system or scheme.
- 1.8. Under Clause 4.10 of the FSC Accreditation Contract Certification bodies agree to ...the proper execution of the Certification Body's duties and obligations under this Agreement either through its own staff or by subcontract.
- 1.9. FSC regards this section of the FSC Accreditation Contract as obliging all certification bodies which enter into a contract with a subcontractor to do so according to a contract whereby the subcontractor is obliged to comply with the duties and obligations of the certification body as if it were the certification body.
- 1.10. This is interpreted by FSC as meaning that restrictions about the issuing of other certificates, the provision of consulting services and the offering of other services which are prohibited to the certification body must also be applied to the subcontractor.
- 1.11. The following guidelines apply to the relationship between FSC accredited certification bodies and their subcontractors. This section is included in the Guidelines for Certification Bodies in order to clearly describe requirements which are already included in the Accreditation Contract and the Accreditation Manual.

## **2. FSC Position**

- 2.1. The guidelines described below address the specific issues raised through the signing of comprehensive agreements or business arrangements which have the effect of or appear to be such agreements between certification bodies and organizations in which the organization provides ongoing and/or exclusive services in a particular region or country.
- 2.2. The accredited certification body will be accountable for all operations carried out under its accredited system.
- 2.3. For the purposes of monitoring, the office of a subcontractor is deemed to be an office of the accredited certification body and is subject to Part 2.4 Section 4.2 of the Accreditation Manual and FSC evaluators shall have the right to conduct evaluation visits to the offices of subcontractors if such visits are deemed necessary by FSC.
- 2.4. 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 FSC evaluators within 48 hours upon written request.

- 2.5. Any additional restrictions in the accreditation contract of the accredited certification body shall also apply to each subcontractor such that the certification body may not provide services through an agent that it is itself restricted to provide.
- 2.6. If FSC determines that the activities of a subcontractor in the issuance of certificates for other schemes which overlap with FSC systems or other forestry activities have or are likely to result in market confusion, FSC shall issue specific corrective action requests to the accredited certification body as it deems appropriate to address determination.
- 2.7. The same conflict of interest provisions bind subcontractors as the accredited certification body.
- 2.8. The accredited certification body and/or the subcontractor may not conduct an audit for a client to whom the subcontractor or the evaluator(s) has(had) provided consulting services where any elements of those consulting services are included in the evaluation.
- 2.9. Subcontractors are not allowed to use FSC trademarks in relation to their organization or the services offered under contract to an accredited certification body.
- 2.10. All promotional material produced by the subcontractor shall be submitted for approval as specified in the Logo Policy Manual.
- 2.11. Subcontractors cannot independently grant approval for the use of FSC trademarks unless they have been trained and specifically authorized by the FSC Trademark Manager.
- 2.12. The accredited certification body must ensure that the subcontractor's personnel who are carrying out work for the accredited certification body have received adequate training. Training requirements are the same as for personnel working directly for the accredited certification body.
- 2.13. A contract must be signed between the accredited certification body and the subcontractor detailing the above mentioned requirements (2.2-2.12) and that contract must be kept on file in the offices of the accredited certification body. Such a contract is required even when the subcontractor is already bound through other contracts or is a related entity.
- 2.14. The accredited certification body shall notify the FSC Secretariat within 30 days of any new contracts or changes in the subcontractor's status (FSC Accreditation Manual Part 3.1 Section 16.2.8). FSC shall be given the following information:
  - Name of the Subcontractor
  - Contact information including: address, telephone, fax and email
  - Scope of the contract (geographic area, type of evaluation or other)
  - Date of signing of the contract
  - Date of expiry of the contract
- 2.15. Subcontractors who are independent FSC members will be placed into the economic

chamber.

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# **PART 2:**

# **Forest Certification**

# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.1: Scope of forest certification

Updated: June 1998

#### 1 Background

- 1.1 Trees may be grown in a wide variety of systems in order to yield a wide variety of products. FSC was founded on the basis that both plantation and natural forests should be within the scope of certification. However there are a number of production systems that cannot clearly be described as 'forests'.
- 1.2 Such production systems include:
  - 1.2.1 Very short rotation crops such as:
    - Conifers, traditionally Norway Spruce (*Picea abies*) grown for use as Christmas trees.
    - Poplar (*Populus* spp.) and other species coppiced on short rotations (e.g. 4 - 7 years) for use as fuel.
    - Willow (*Salix* spp.) and other species coppiced on short rotations for production of shoots for e.g. basketwork and production of hurdles.
  - 1.2.2 Orchards;
  - 1.2.3 Silvo-pastoral production systems;
  - 1.2.4 Agro-forestry production systems;
  - 1.2.5 Plantations managed for Non Timber Forest Products (e.g. rubber, oil palm, coconuts).
- 1.3 The term 'forest' denotes a formation dominated by trees. It is defined by the Shorter Oxford Dictionary as 'An extensive tract of land covered with trees and undergrowth sometimes intermingled with pasture'.
- 1.4 A 'tree' in turn is defined as 'A perennial plant having a self-supporting woody main stem or trunk (which usually develops woody branches at some distance from the ground), and growing to a considerable height and size. Extended to bushes or shrubs of erect growth and having a single stem; and even some perennial herbaceous plants which grow to a great height, as the banana or plantain'.
- 1.5 Such linguistic definitions may not however be useful for the purpose of defining the scope of certification. An area growing a very short rotation crop of trees would not normally be

described as a forest, because the trees have not yet developed their 'considerable height and size'. Nevertheless, the area may consist of 'an extensive tract of land covered with trees and undergrowth'. If the same area was left to grow without intervention it would very likely develop into a forest. Similar problems apply to other production systems, such as orchards.

- 1.6 Are such production systems within the scope of forest certification? Can such production systems be classified as 'forests', or management of them be described as 'forest stewardship'? If these production systems are classified as forests, is it possible for them to comply with the FSC P&C?

## **2 FSC Position**

- 2.1 FSC accepts a broad definition of 'forest' as its starting point in defining the scope of FSC accreditation of forest stewardship. For the purposes of defining scope a forest is 'A tract of land dominated by trees'.

- 2.2 The second determinant of scope is whether such a tract of land dominated by trees can be managed in compliance with the *FSC P&C*, and maintain the ecological functions and values required by the *FSC P&C*. Satisfaction of this requirement depends on the particular production system in question rather than on the product type, or the tree species as such.

- 2.3 Whether the ecological functions and values of a forest can be maintained has to be judged on a case by case basis, with reference to comparable natural forest ecosystems. The decision includes consideration of the species involved as well as the production system itself.

- 2.4 Very short rotation tree crops

2.4.1 The FSC Principles and Criteria include a number of requirements which require the development of mature trees. These include criteria 6.2, 6.3 and 6.4, and in the case of plantations, criteria 10.1, 10.2, 10.3, and 10.5.

2.4.2 Forest management units or systems in which the main management objective is the production of short rotation products would not be expected to meet these criteria. Such management systems are therefore outside the scope of FSC-accredited forest certification.

2.4.3 Some areas of short rotation tree crops may however form part of a larger area devoted mainly to longer cycles or to forest conservation or restoration. There is nothing in principle which prevents such products being produced in the context of a forest management system that complies with the FSC Principles and Criteria, in which case the products are eligible to carry the FSC Logo.

2.4.4 Regional Forest Stewardship Standards may provide further clarification as to the limits of area of short rotation tree crop that can be regarded as forming part of a wider forest management system, eligible to meet the requirements of the *FSC P&Q*.

## 2.5 Oil palm.

- 2.5.1 Oil palm (*Elaeis guineensis*) is a tropical African forest palm. Its native habitat was the moist tropical forest of the Gulf of Guinea, from about Nigeria to the Republic of Congo. Fruits of the palm have been collected since ancient times, and cultivation by the forest peoples may have taken place as long as 5000 years ago. It grows to a height of about 15m and can live to around 80 years of age. The earliest plantations are thought to have been established through natural germination following removal of the native forest canopy ('Tropical plants' W.Lötschert & G.Beese, HarperCollins Publishers, 1994).
- 2.5.2 A typical production system for oil palm involves trees being grown to adulthood. Fruit may be harvested year round. Trees are typically felled and replaced when more than 30 - 40 years of age. Whilst management is typically intensive, there is no reason in principle why trees should not be grown in a way that allows the development of an undercover, in combination with other species along watercourses and in protected areas, thus allowing the ecological functions and values of a forest to develop.
- 2.5.3 In *principle* therefore, there is no reason why an oil palm plantation should not be eligible for certification.
- 2.5.4 In practice whether an oil palm plantation can be certified would depend on compliance with the FSC P&C, as it would for a plantation of any other species.
- 2.6 Similar arguments may be advanced for other species such as rubber, cacao, brazil nut trees, apples, oranges or olives.
- 2.7 In the case of silvo-pastoral, agroforestry and medium to long rotation coppice systems decisions would have to be made on a case by case basis. FSC recognises that there may be no clear-cut distinction between a system which is sufficiently close to maintaining the ecological functions and values of a forest to be certifiable, and one which does not. In such cases it is recommended to agree with the FSC Secretariat whether the system in question is within the scope of the FSC certification system before entering into an evaluation contract with the client.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.2: Clearance of encroaching forest

Updated: June 1998

#### 1 Background

- 1.1 The FSC P&C actively promote the conservation, and in some cases restoration of forests. Principle 9, for example, states that primary forests and well-developed secondary forests shall not be replaced by tree plantations or other land uses.
- 1.2 Is it acceptable to clear areas in which trees are encroaching onto unforested land?

#### 2 FSC Position

- 2.1 Encouragement of natural regeneration on non forested land may often contribute to compliance with of Principles 6, 9 and 10.
- 2.2 However clearance of natural regeneration and even early secondary forest is not forbidden, as long as this does not conflict with other FSC Principles, and in particular so long as the encroaching forest has not reached the stage of 'well developed secondary forest'.
- 2.3 When encroachment by natural regeneration is degrading the (non-forest) habitat of a rare, threatened or endangered species or where such encroachment is by exotic species, clearance may be required in order to comply with FSC criteria.
- 2.4 In general certification bodies should ensure that such clearance operations are explicitly justified in the evaluation report, and that they do not compromise other environmental management objectives (e.g. with respect to criterion 6.3).
- 2.5 So long as such clearance operations are carried out within the context of an integrated forest management plan for the whole area, the resulting forest products may be sold as certified.
- 2.6 FSC is developing a policy for forest products from farms and agro-forestry systems, and is also exploring partnerships or recognition agreements with organic, fair trade, and ecolabel systems. In future, agro-pastoral management systems may be linked with certified forest management systems. Meanwhile, certification bodies should evaluate each case on its merits, and consult with the FSC Secretariat.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.3: Financial evaluation

Updated: June 1998

#### 1 Background

- 1.1 FSC's mission is to support environmentally appropriate, socially beneficial and economically viable management of the world's forests. The FSC P&C are designed to implement this mission. There has however continued to be debate as to the extent to which FSC-accredited certification bodies should undertake evaluation and certification of the financial aspects of forest management.
- 1.2 Some FSC members have considered that evaluation of financial aspects should be interpreted very widely, to include for example the source of funding for forest management, and the methods of fundraising and marketing. Other FSC members believe that financial evaluation should be interpreted more narrowly, since the financial audit and accountancy skills required are beyond the area of expertise of FSC and FSC-accredited certification bodies, and are best left to other agencies.
- 1.3 FSC has contributed funding to research programmes to provide guidance on this issue. This funding led to the preparation of a paper written under the CIFOR programme for development and evaluation of criteria and indicators for forest management. The paper '*Rational exploitations: Economic criteria and indicators for sustainable management of tropical forests*' by Ruitenbeek H.J and Cartier C (1998), is available from CIFOR and FSC.

#### 2 FSC Position

- 2.1 Economic criteria are already specified in a number of the FSC Principles, especially Principle 5. More widely the whole set of social and environmental are designed to enhance economic sustainability.
- 2.2 Certification bodies and FSC National Initiatives are encouraged to study the CIFOR paper, especially Table 5 'Recommended Criteria and Indicators', with a view to improving the certification bodies' 'generic standards', and FSC Regional Standards. FSC does not at present recommend further specific criteria and indicators for financial evaluation.
- 2.4 Certification bodies must ensure that claims about certification are accurate and are not misleading. The FSC certification system does not provide a financial audit, and does not provide or imply a guarantee of financial returns. Certification bodies must ensure that their clients do not make such claims either explicitly or by implication. Certification bodies are already required to review and approve off-product use of the FSC Logo by certificate holders, for example in brochures or reports.
- 2.5 Certification bodies must ensure that an appropriate 'off-product claim' is made when the FSC Logo is used in brochures or similar applications. The off-product claim explains the extent of responsibility of the certification body and of FSC. Certification bodies may also

require disclaimers which explain that other claims made by the supplier are NOT endorsed by the certification body.

- 2.6 The FSC Secretariat is reviewing requirements related to monitoring of general claims about the certified status of forests and forest products. Any changes resulting from this review will be circulated for comment prior to implementation.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.4: Certification thresholds

Updated: June 1998

#### 1 Background

- 1.1 The *FSC P&C* states that 'FSC and FSC-accredited organizations will not insist on perfection in satisfying the P&C. However major failures in any individual principles will normally disqualify a candidate for certification, or will lead to decertification'. The way in which FSC would determine whether a particular forest attained the threshold required for certification was not specified.
- 1.2 The FSC Secretariat subsequently published a detailed discussion paper to clarify this issue '*Implementation of the FSC Principles and Criteria of Forest Stewardship*' 28 January 1998. This paper describes the background to the issue in some detail, and proposes clear guidelines as to how FSC will evaluate thresholds.

#### 2 FSC Position

- 2.1 As from 1st January 1999 ALL certification body 'generic' standards and FSC regional Forest Stewardship Standards MUST be presented in a structure which follows the 10 FSC Principles.
- 2.2 As from 1st January 1999 ALL certification body scoring and decision support systems must demonstrate explicitly, and at the level of each FSC Principle individually, that the Principle has been met by the forest management enterprise in order for a certificate to be awarded.
- 2.3 As from 1st January 1999 FSC shall endorse regional Forest Stewardship Standards only if:
  - 2.3.1 they can be implemented in the forest, without further interpretation;
  - 2.3.2 they specify operationally what they mean by 'major failures' of the FSC P&C, at the level of each individual Principle.
- 2.4 An FSC policy for framing complaints about certified forests will be specified, which requires that complaints about certification decisions must be based on alleged 'major failures' of individual FSC Principles, as demonstrated by consideration of:
  - the certification body standard for the country concerned, OR
  - the FSC-endorsed Forest Stewardship Standard for the region concerned.

The definition of 'major failure' must be based on consideration of a forest management enterprise's performance with respect to the criteria and indicators of the relevant standard, AND consideration of the importance and consequences of any failures at the levels of criteria and indicators.

This policy will be implemented in the form of guidelines to FSC Members, and incorporated into the FSC Dispute Resolution Procedures.

- 2.5 The FSC Secretariat will prepare, as soon as possible, a detailed set of guidelines for regional working groups, describing and explaining the known options for the operational definition of 'major failures' at the level of each individual Principle.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.5: Group certification

Updated: June 1998

#### 1 Background

- 1.1 There are obvious economies of scale in the certification of forest management enterprises. In order to ensure that certification is accessible for small landholders as well as large enterprises, FSC-accredited certification bodies have developed special protocols for grouping together a number of smallholders under a single certificate, a technique known as 'group certification'.
- 1.2 The FSC General Assembly in 1996 approved the development of such approaches to certification. The FSC Secretariat subsequently prepared and circulated a number of papers on the subject of group certification (e.g. FSC doc 5.1.1). A set of proposals was prepared in January 1998, and subsequently revised in April 1998 (*Group certification: Guidelines for certification bodies* (Draft 1-1), 7 April 1998).

#### 2 FSC Position

- 2.1 FSC Policy on group certification was finalised in June 1998, and is available from the FSC Secretariat entitled '*Group Certification: FSC Guidelines for Certification Bodies*'.
- 2.2 All certification bodies are now required to develop a protocol for group certification in compliance with the FSC guidelines.

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# **FSC Guidelines for Certification Bodies**

## **Part 2: Forest Certification**

### **Subject 2.6: National and local laws**

**Updated: June 1998**

#### **1 Background**

- 1.1\_ FSC Principle 1 states that 'Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is signatory, and comply with all FSC Principles and Criteria'.
- 1.2\_ The first criterion of this principle states that 'Forest management shall respect all national and local laws and administrative requirements'.
- 1.3\_ Certification bodies have sometimes been unsure as to the scope of applicable laws they are expected to consider in an evaluation. There are also concerns as to possible legal implications of issuing a certificate of compliance with this Principle.

#### **2 FSC Position**

- 2.1 The FSC Secretariat interprets 'all applicable laws' as referring to laws which affect the implementation of the FSC Principles and Criteria. It does not include laws which do not impinge on the listed criteria. Local and national legislation thus provides the minimum requirement for compliance with any specific criterion.
- 2.2 In countries or regions in which there is an FSC National Initiative, the National Initiative can provide a certification body with copies of relevant national legislation.
- 2.3 FSC requires that in all evaluation reports the certification body lists the legislation that was considered relevant for the evaluation. Members of the evaluation team are expected to be familiar with the impact of this legislation on minimum requirements for implementing the FSC Principles and Criteria.
- 2.4 Certification bodies should ensure that the written policies and plans of a forest management enterprise comply with legal requirements. Certification bodies should also ensure that the observed practices comply with legal requirements.
- 2.5 Certification bodies must also make efforts to determine whether there are any current or recent legal disputes involving the applicant for certification. Such efforts will include consultations with local forestry officials and other forest stakeholders.
- 2.6 It is clearly impossible for any body to guarantee that a forest management enterprise is in full compliance with all laws and regulations at the time of the evaluation or thereafter. It is however possible to state that there were no known non-compliances at the time of the evaluation, or at subsequent monitoring. It is also possible to ensure that the observed practices are in compliance with laws and regulations. The basis of FSC policy is that when infringements come to the attention of FSC or the certification body, this can be grounds for

withdrawing a certificate.

- 2.7 The basis of FSC monitoring will be to ensure that the certification body made appropriate efforts to determine whether a forest management enterprise respected all applicable laws.
- 2.8 Certification bodies should ensure that their own literature and contracts provide appropriate legal protection against claims made by the client or third parties that certification provided a guarantee that the certified party was in full compliance with all laws and regulations.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.7: Mining and Quarrying

Updated: June 1998

#### **1 Background**

- 1.1 In many countries mineral rights are separated from rights of ownership or rights to manage land for forestry or other purposes. Often these rights are dealt with by different government departments, and may be exercised by different and independent entities.
- 1.2 This can lead to major conflicts between a forest management enterprise trying to implement forest stewardship in compliance with the FSC P&C, and other enterprises engaged in mineral prospecting or extraction.

#### **2 FSC Position**

- 2.1 The basis of certification is implementation of the FSC Principles and Criteria in the forest.
- 2.2 If mining can be carried out in a forest area without compromising implementation of the FSC Principles and Criteria, then that forest area may be certified. However if mining activities do compromise implementation of the FSC P&C, even if this is legal and beyond the control of the forest owner or manager, then the forest area may not be certified.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.8: Non Timber Forest Products

Updated: June 1998

#### 1 Background

- 1.1 Accreditation, certification and labelling of Non Timber Forest Products (NTFPs) has been under discussion with FSC members since 1995.
- 1.2 The FSC P&C make limited references to evaluation of harvesting of NTFPs. Criterion 5.2 encourages the use and local processing of the forest's 'diversity of products'. Criterion 5.4 urges forest management to avoid dependence on any 'single forest product'. Criterion 5.6 requires that the rate of harvest of forest products shall not exceed levels which can be permanently sustained.
- 1.3 It has been recognised for some time that additional guidance is required with respect to the level of evaluation that is required, especially when there is harvesting of NTFPs for commercial sales, or when non-commercial harvesting of NTFPs has important impacts. Special guidelines are also required for the labelling of NTFPs.

#### 2 FSC Position

- 2.1 At the 12<sup>th</sup> FSC Board meeting, January 1998, the FSC Board approved a policy to allow certification and labelling of NTFPs with immediate effect.
- 2.2 NTFPs from certified forests may carry the FSC Logo on-product, and may be promoted with the FSC Logo and Trademarks off-product. FSC Trademarks may not be associated in any way with NTFPs unless they come from forests fully certified within the FSC system.
- 2.3 If a client wants to make on-product or off-product claims, the certification body must evaluate the management system used for the specific NTFP. The NTFP evaluation may take place during the main certification evaluation, or may be carried out at any time afterwards.
- 2.4 The certification body should use standards prepared or adapted in the region for that NTFP, or it must prepare its own NTFP standards by a process of national or regional consultation similar to the process currently used for the certification body standards. Certification bodies should consult with the FSC Secretariat in case of uncertainty.
- 2.5 At this stage, the certification body does not require formal approval by the Secretariat for the standards used, but will follow its existing procedures for adapting existing standards, or its own generic standards.
- 2.6 Some FSC members are preparing and testing standards for NTFP certification. Certification bodies are expected to take account of existing NTFP standards, case by case, whenever they are contracted to certify and label NTFPs, even when the standards are not formally endorsed by FSC.

- 2.7 In due course draft standards for NTFPs may be submitted for FSC Board endorsement.
- 2.8 Chain of custody certificates may be issued for NTFPs, as for timber-based products. The FSC policy for percentage based claims will be adapted to cope with practical requirements.
- 2.9 FSC will register the FSC Trademarks for the appropriate classes at the request of the certification body. The FSC Secretariat will provide this service, which will be paid for at cost by the certification body requesting it, or may be partly paid for by FSC if funds are available. The cost may be passed on to the client which has requested the sub-licence to use the FSC Trademarks for labels or market claims. The cost is likely to be around US\$500 per trademark per country and category, and typically takes 3 - 6 months. The certification body should inform its client of the probable cost of registration at an early stage. FSC will not charge a fee for use of the Trademarks at present. This policy will be reviewed in due course, as part of FSC's study of Trademark fees and funding.
- 2.10 Claims and labels should use a form of words adapted as appropriate from the recommendations in the FSC Logo Guide. All parties may take a flexible approach, with full consultation between the certification body, the FSC Secretariat, and the client.
- 2.11 When NTFPs are harvested for commercial sale or when non-commercial harvesting has important impacts certification bodies should carry out more intensive evaluation than already required as part of forest evaluations, even when no NTFP is to be FSC labelled or endorsed by FSC. More specific guidelines are under development by the FSC Secretariat, in consultation with the FSC Working Group on NTFPs and with certification bodies.

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# **FSC Guidelines for Certification Bodies**

## **Part 2: Forest Certification**

### **Subject 2.9: Cut-off dates**

**Updated: June 1998**

#### **1 Background**

- 1.1 Many forests have been managed in the past in ways that do not meet the FSC Principles and Criteria. The effects of these past non-compliances may however be long-reaching. Such non-compliances might include poorly designed patterns of roading, or selection of plantation species that are inappropriate to the site.
- 1.2 FSC's objective is to bring the management of such forests into compliance with the FSC Principles and Criteria. FSC does not therefore exclude forests from being certified, on the basis of past problems.
- 1.3 However FSC does not consider it acceptable for forest managers to continue destructive but profitable practices now, and then be eligible for certification when these practices can no longer be continued. It should not for example be possible for a forest owner/manager to clear a natural forest and replace it with a plantation, in the expectation that the plantation will be certified.
- 1.4 In 1996 it was proposed that FSC should operate a 'cut off date' for plantations starting on the date on which FSC Principle 10 was approved. Thus plantations that were established on natural forest land cleared prior to January 1996 would still be eligible for certification, but plantations established on natural forest land cleared after January 1996 would never be eligible for certification.
- 1.5 A similar proposal has been made for forest reserves. Thus forest in reserves at the date on which FSC Principle 9 is approved would never be eligible for certification, even if the reserved status were to be removed at a future date.

#### **2 FSC Position**

- 2.1 Forest managers who inherit the problems of previous managers/owners may be certified so long as appropriate actions are being taken to mitigate the effects of such past mistakes, appropriate actions are being taken to correct the inherited problems, and the same mistakes are not being repeated.
- 2.2 FSC does not expect inherited problems to be corrected instantly. If plantation species have been poorly selected in the past, FSC does not expect all areas planted with these species to be cleared prior to certification. FSC does however expect there to be a plan in place to remove the poorly adapted species over a reasonable time-frame, and which ensures that species selection is improved. Similarly in the case of a poorly designed road system, FSC

does not expect a new road layout to be immediately superimposed on the old one. FSC would however expect areas that are causing erosion or blocking watercourses to be re-routed or re-built, and guidelines regarding future road-building and maintenance to be in place.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.10: Conversion between plantation species

Updated: June 1998

#### 1 Background

1.1\_ Some of the earliest plantations certified under the FSC system were rubber plantations, whose wood was used to make doors. As the economics of plantation grown rubber have changed, many rubber plantations are being converted to oil palm. In November 1996 SGS Forestry requested guidance from FSC on whether it would be considered acceptable to certify rubber wood from rubber wood plantations being converted to oil palm.

#### 2 FSC Position

2.1 FSC's position is that so long as the plantation system prior to conversion is certifiable, and the system after conversion is certifiable, there is no reason in principle why the conversion should not take place.

2.2 Nevertheless the certification body should take particular care in evaluating such situations to ensure that the FSC Principles and Criteria are complied with during the conversion process, and are complied with in the succeeding management system in all its aspects.

2.3 It is inevitable that in the course of such a conversion the yield of a particular product will change. Since the change in production is the direct result of a controlled and planned change in the planted species, this is acceptable.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.11: Single species sustained yield

Updated: June 1998

#### 1 Background

- 1.1 In any natural forest there is a succession of trees of different species at different scales. At scales varying from a single tree gap, to the aftermath of a flood, forest fire, hurricane or landslip there is a succession from colonising trees to the trees typical of an older forest. No forest is at a steady state across all scales.
- 1.2 A typical pattern of 'management' of natural forests worldwide has been to successively harvest the most valuable species of the most useful size-classes, with varying degrees of consideration of the consequences for future management of the forest. This has often been combined with techniques to discourage or eliminate the less useful species. This pattern may generate a succession of 'commercial' species as the most valuable are repeatedly removed until they become either commercially or locally extinct. In this way the forest may become commercially and environmentally degraded until it is abandoned, often to be burnt or converted to agriculture.
- 1.3 Between these extremes are forest managers trying to achieve a commercial harvest of wood and non wood products whilst maintaining the social and environmental values of the forest. Nevertheless, any commercial harvesting of trees will influence the natural succession, at a scale dependent on the scale of harvesting. Many management systems in fact intentionally distort both the the species and size-class distribution in order to favour 'commercial' species of 'commercial' sizes. Such distortions must have an effect on the distribution of biodiversity within the forest.
- 1.5 Furthermore there may be an inherent conflict between some impacts of harvesting or management, and the longer term distribution of species and age-classes within the forest. Many commercial species, including mahogany (*Swietenia spp.*) are essentially light demanding. Higher intensity logging will create more light, improving regeneration, but increasing disturbance. Single tree logging will allow less light, reducing regeneration, but causing less disturbance. There is therefore an inherent trade-off between the objectives of reducing short term environmental impact, and the longer term environmental objective of regeneration. Opinion amongst conservation scientists appears to be divided as to the environmentally preferable option (e.g. see P. Rice, Scientific American March 1997). Similar conflicts are common in temperate as well as tropical ecosystems.
- 1.6 How should a certification body determine whether a particular forest management enterprise is carrying out uncontrolled degradation of the forest, or is implementing long term forest stewardship?

## **2 FSC Position**

- 2.1 The FSC Secretariat considers that it would be counterproductive to insist that companies slavishly work to ensure single species sustained yield, when the implication is a high level of immediate environmental impact, a high financial cost, and unknown longterm environmental impacts.
- 2.2 In situations in which logging is likely to lead to long term changes in species and size-class distribution it is essential that representative areas, and areas of particular conservation value, are protected from logging.
- 2.3 Where there are doubts as to the impact of logging on long term yields of forest products it becomes especially important to implement the monitoring requirements of Principle 8. Criterion 8.2 states:

*'Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators:*

- a) Yield of all forest products harvested.*
- b) Growth rates, regeneration and condition of the forest.*
- c) Composition and observed changes in the flora and fauna.*
- d) Environmental and social impacts of harvesting and other operations.*
- e) Costs, productivity, and efficiency of forest management.'*

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.12: Integrated wood processing facilities

Updated: June 1998

#### 1 Background

- 1.1 There are many examples of forest management enterprises with integrated wood processing facilities. They often have a substantial social, environmental or economic impact. It is not always clear whether they form part of the forest management system, or whether they should be included in an evaluation of forest stewardship.

#### 2 FSC Position

- 2.1 On-site wood processing facilities should be considered as an integral part of the forest management enterprise.
- 2.2 Relevant aspects of any on-site wood processing facility must therefore be evaluated as part of the forest management enterprise evaluation. Relevant aspects include parts of Principles 4, 5, 6 and 8.
- 2.3 When processing facilities are closely linked to forest management at either a project or enterprise level and yet are not part of the same site, the certification body may exercise discretion in determining whether the facilities are to be considered an integral part of the forest management enterprise or not. In general, if workers in an integrated wood processing facility are employees of the same enterprise as are the forest workers, then the certification body should include the site in the evaluation of Principle 4 'Community relations and workers' rights'.

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# **FSC Guidelines for Certification Bodies**

## **Part 2: Forest Certification**

### **Subject 2.13: Partial certification of large ownerships**

**Updated: June 1998**

#### **1 Background**

- 1.1 In order to become an FSC member, forest management enterprises must have demonstrated an active commitment to implementing the FSC P&C in their operations. It is expected that they shall already have a significant part of their production forests certified by an FSC-accredited certification body or be certified within a reasonable time frame (normally this will not exceed two years).
- 1.2 No such commitment has been required of forest management enterprises that wish to have part of their production forest certified but do not wish to become FSC members, although some FSC members have sometimes assumed that this is the case.
- 1.3 The issue was discussed in a preliminary session at the FSC General Assembly in June 1996. FSC members expressed concern at the risk of 'greenwashing' by large companies who have small model operations whilst the large majority of their holdings fail to practice forest stewardship.
- 1.4 A related consideration is the requirement that 'forest managers demonstrate a long term commitment to adhere to the FSC Principles and Criteria' (FSC Principle 1, Criterion 1.6). It is not clear that a manager could demonstrate such commitment by complying with the FSC P&C in one forest area, whilst clearly failing to comply in another.
- 1.5 Finally, guidelines are required as to whether management divisions or subdivisions, or separate concession areas can be certified separately.

#### **2 FSC Position**

- 2.1 FSC does not require a forest management enterprise to apply to have all of its forest operations certified, nor to agree to a timetable for such evaluation, in order to have part of its operations certified.
- 2.2 There are a number of reasons for this:
  - 2.2.1 Targets for increasing the area certified would have to be specified taking into account a number of extraneous factors such as total size of ownership, commitment of different managers, available resources for forest management and certification, demand for FSC labelled produce. At any one time managers could have very different commitments with no obvious means for determining whether one commitment is fair whereas another is not.
  - 2.2.2 If certification is conditional on meeting such targets, the certification body will be in the invidious position of having to withdraw certification from a manager with, for

example, 100 000 ha of certified forest because the enterprise has missed its target of certifying 150 000 ha for that year, whereas the company's neighbour, with only 50 000 ha of certified forest can maintain their certificate.

- 2.2.3 Timber labelling is designed as a market incentive to improve forest stewardship. It would be counterproductive to insist that forest managers accept additional costs if these costs are not likely to be supported by market benefits. Conversely, if a forest manager finds that the costs of certification are covered by market or non market benefits then the manager will increase the certified area in any case.
- 2.3 Nevertheless, in order to control against greenwashing and to evaluate the managers' compliance with Criterion 1.6, the certification body should follow these guidelines:
- a The applicant for certification must make a full disclosure of all forest areas over which the applicant has some responsibility, whether as owner (including share or partial ownership), manager, consultant or other responsibility. The disclosure shall be documented in the certification report.
  - b When the evaluation does not include all the forest areas in which the applicant is involved, the applicant must explain the reasons for this, and the reasons must be documented in the certification report.
  - c The certification body shall be responsible for determining whether the stewardship of the forest lands not covered by the certificate compromises *the applicant or certificate holder's* demonstration of a long-term commitment to adhere to the *FSC P&C* (Criterion 1.6), and for evaluating whether this results in a serious failure *by the applicant or certificate holder* of FSC Principle 1. If the certification body concludes that this does result in a serious failure of Principle 1, then a certificate shall not be issued, or a condition or corrective action request shall be specified. If a condition or corrective action request is not complied with, an issued certificate shall be withdrawn.
  - d When the evaluation does not include all the forest areas in which the applicant is involved, the certification body must make an explicit statement in the certification report explaining the special controls that are in place that ensure that there is no risk of confusion being generated as to which activities or products are certified, and which are not.
  - e As for all certificates, the certification body must ensure that all use by the certificate holder of the certification body name and logo, and the FSC name and Trademarks, are pre-approved by the certification body.
- 2.4 Paragraph 2.2.c above also relates to the decision as to whether management divisions, sub-divisions, or individual concession areas can be certified separately. In general they can be certified separately only if they are clearly separated independent units in terms of their geography, ownership and/or management structure. There are no hard and fast rules, but the following examples may be used as precedents:

- 2.4.1 A single company owns properties in different countries. The properties are managed independently, and can apply to be certified independently.
  - 2.4.2 A single company owns properties in different regions of the same country. The properties are managed independently, and can apply to be certified independently.
  - 2.4.3 A large plantation area is owned and managed by a single state enterprise, divided into several divisions and subdivisions. Whilst all subdivisions are required to manage according to the same general guidelines, each subdivision has its own managers who are responsible for management planning, and implementing the guidelines in their subdivision and not in other subdivisions. The subdivisions can be certified independently.
  - 2.4.4 A single forest estate has both coniferous and broadleaved stands. The stands are contiguous and managed by the same management team. The management is integrated and products are marketed as coming from a single forest management enterprise. The stands cannot be certified separately.
  - 2.4.5 A single company harvests state forests under short concessions. The concession areas are contiguous and managed by the same management team. The management is closely integrated and concession areas are managed essentially as parts of a single forest management enterprise. The concession areas cannot be certified separately.
- 2.5 A single company may arrange for a number of independently managed properties or subdivisions to be evaluated at the same time, in order to reduce administrative and travel costs. Certification bodies should note that this is NOT group certification, since each entity will hold its own certificate in its own name, and maintenance of each certificate does not depend on compliance of other managers or owners with the FSC P&C.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.14: Certification of concessions

Updated: June 1998

#### 1 Background

- 1.1 Forest land is often managed and/or harvested on a concession system. The landowner, typically a state, leases the right to harvest the concession area to a private company for a specified length of time. The concession is issued subject to terms and conditions agreed between the land owner and the concessionaire which vary widely from one case to another. The landowner has the right to revoke the concession if the terms of the agreement are not met. Concessions may be leased for short time periods (e.g. 5 years), based on harvesting rights, or for much longer (e.g. 30 years) based on harvesting rights and many management responsibilities. Even the longest concessions rarely reflect the life cycle of the harvested species.
- 1.2 The concession system raises a number of issues for certification bodies and FSC. Firstly, it represents a division of responsibilities between the owner and the manager. Criterion 1.6 of the FSC Principles and Criteria refers to the forest managers' commitment to adhere to the FSC P&C, rather than the forest owner's. This criterion requires clarification in the case of a concession system.
- 1.3 Secondly, Criterion 2.1 asks for 'clear evidence of long-term forest use rights to the land'. Whilst the legal rights of concessionaires are often clear, it is not clear whether these can be considered 'long-term'. The situation is compounded when a concessionaire applies for certification towards the end of a concession period.

#### 2 FSC Position

- 2.1 Division of management responsibilities between owners and managers is very common in forestry. It occurs on all scales from the very large to the very small. In such cases the manager's freedom to manage the land in accordance with the FSC P&C may be constrained by the owner's management objectives. However committed the manager is to implementation of the P&C, the manager may be over-ruled by the owner. It is therefore essential that the manager has explicit authorisation from the owner to manage the forest in compliance with the FSC P&C. In the case of concession systems the certification body must be satisfied that the manager has full authority to implement the FSC P&C in the concession area. It must be clear to the manager that if the owner imposes constraints which prevent implementation of the P&C, the certificate will be withdrawn.
- 2.2 It is NOT an FSC requirement that the owner has shown a commitment to certification to the FSC P&C over their whole forest land base (see subject 2.13: 'Partial certification of large ownerships').
- 2.3 Short concession lengths have been symptomatic of short-term interest in the forest. However the length of a concession does not of itself determine whether good management

will or will not take place, nor whether the owners or managers are committed to the FSC Principles and Criteria. Ownership of forest land can change, even where the land is owned by the forest manager. Long concessions may change hands before their expiry date.

- 2.4 FSC does not consider that a short concession length necessarily precludes certification. In some cases, very short logging concessions or harvesting licences may be issued by owners (including states) committed to good long term management. Similarly the number of years that a concession has to run does not determine whether certification is possible or not. A forest manager coming to the end of a 50 year concession is just as eligible for certification as a forest manager at the start of a 50 year concession. The key factor is whether there is convincing evidence of management for the long-term stewardship of the forest.
- 2.5 In evaluating long-term commitment to the FSC Principles and Criteria, FSC is looking for evidence of resources invested in long term management - for example in research, inventory, management planning, roading, controlled harvesting, post harvest inventory and forest protection. These are considered in other FSC Criteria.
- 2.6 In evaluating long-term forest use rights to the land, FSC is looking for clear long-term use rights of the owner. These may be partially delegated to a responsible authority, such as a concessionaire, for a shorter or longer period. FSC is then looking for clear evidence of this delegation of authority, together with the owner's commitment that the delegated authority has the right to manage the land in compliance with the FSC P&C.
- 2.7 When ownership or management changes during the period of validity of a certificate, the certification body must withdraw the certificate, and may re-issue it in the name of the new owner/manager only if the certification body is satisfied that the conditions on which certification depends are still being complied with.

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# **FSC Guidelines for Certification Bodies**

## **Part 2: Forest Certification**

**Subject 2.15: Primary forests**

**Updated: June 1998**

### **1 Background**

### **2 FSC Position**

- 2.1 The FSC position with respect to certification of primary forests is currently under review. Primary forests are not precluded from certification. Many primary forests are currently certified, and are being managed for the commercial production of timber. Certification bodies considering certification of primary forests are advised to contact the FSC Secretariat for the latest information regarding this issue.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.16: Conditional certification

Updated: February 2002

#### 1 Background

- 1.1 The FSC certification system is ultimately based on a binary decision - whether a forest complies, or does not comply, with the *FSC P&C*. Products from forests that do comply with the FSC P&C are eligible to carry the FSC Logo.
- 1.2 It has often been suggested that FSC should allow a second category of forests with an interim status, that should be allowed to carry the FSC Logo in a modified form, for example in another colour or in outline. FSC does not do this because it would confuse and dilute FSC's message to the public. It is very difficult to promote a single message to the public, conveyed by a single logo. All the marketing and advertising advice FSC has received has been against confusing the issue with two logos, or the same logo used in slightly different ways.
- 1.3 Flexibility already exists in the FSC system in the certification decision. FSC and FSC-accredited certification bodies do not insist on perfection in satisfying the P&C, in order for a certificate to be awarded (see subject 2.4: 'Certification thresholds'). Certification decisions are typically modified by pre-conditions, conditions or recommendations.
- 1.4 Pre-conditions: if a forest management enterprise undergoes full evaluation for certification, but does not reach the threshold for certification, the certification body is obliged to identify the areas in which the enterprise's performance did not reach the required level. FSC allows the certification body to specify for the client actions that must be taken in order to reach the required threshold in future. These are described as pre-conditions. If the client complies with the pre-conditions within a reasonable time period and to the satisfaction of the certification body, and assuming that other areas of performance are maintained, a certificate may be issued.
- 1.5 Conditions: a certification body may decide that although a forest management enterprise does not comply fully with all the relevant criteria and indicators of a Forest Stewardship Standard, the seriousness and consequences of the small number of failures is not sufficient to preclude certification. In this case the certification body may issue a certificate, contingent upon the client's agreement to comply with specified conditions within a specified time frame (usually one or two years). Before a certificate is issued the client must sign a binding undertaking to comply with these conditions in the specified time frame. The certification body monitors compliance at subsequent site visits. If compliance is unsatisfactory the certificate must be revoked. Conditions are taken very seriously by FSC, because they indicate non-compliance (although minor non-compliance) with the FSC P&C. A certificate cannot be defended if the cases of non-compliance are numerous.

1.6 Recommendations: a certification body may also specify recommendations to a client. In these areas the client does comply fully with the relevant criteria and indicators of a Forest Stewardship Standard, but the certification body is able to offer advice to the client as to how management may be improved - for example to achieve the objectives in a more efficient or effective manner, or because the current procedures achieve their objective, but appear weak. The client is not committed to taking the advice, but the certification body will normally follow up at subsequent site visits to determine whether a particular situation has deteriorated. If it has, or if it appears that it may do so shortly, a recommendation may be strengthened to the status of a condition in order to maintain certified status.

## **2 FSC Position**

2.1 FSC does not operate an interim status for forests that are in the process of attaining compliance with the FSC P&C.

2.2 Certification bodies may develop systems of certification decision making which are contingent on the client complying with specified conditions after the certificate has been issued. In such cases the client must be contractually obliged to comply with such conditions, in the time scale specified, in order for the certification to be maintained.

2.3 If the specified conditions are not complied with in full within the specified time period, the certificate shall be withdrawn unless the certificate holder and the certification body can present fully satisfactory reasons and justifications for the non-compliance or delay.

2.4 All conditions upon which certification is contingent must be specified, in full, in the public certification summary. The certification body may make additional recommendations with respect to how conditions may be met, which do not have to be included in the public summary.

2.5 If a certificate has been issued after pre-conditions have been met by the applicant, then it is up to the applicant and the certification body to decide whether the public certification summary will specify the original weaknesses and pre-conditions together with an explanation of how the weaknesses have been corrected, or whether the public summary will only describe the current state of management after correction of the identified weaknesses. In any event, public summary documents shall contain sufficient information to make clear the correlation between the specific results of the certification assessment and the FSC Principles, with the exception of legitimate proprietary information.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.17: Regional standards

Updated: February 2002

#### 1 Background

- 1.1 The FSC certification system operates on the basis of Forest Stewardship Standards with which a forest management enterprise must comply in order to receive certification. Such a standard must conform with the FSC P&C. The FSC P&C do not of themselves constitute a Forest Stewardship Standard because they require further interpretation and the addition of evaluation indicators in order to be implemented at the forest management unit level.
- 1.2 Forest Stewardship Standards are developed by regional working groups, and must be endorsed by the FSC. Many such standards are under development at the current time. In the interim, certification bodies are permitted to develop their own locally adapted generic standard, or 'prestandard' for use in regions for which no FSC endorsed regional Forest Stewardship Standard yet exists.
- 1.3 There has sometimes been some confusion as to the status of standards that are under development by a regional working group but that have not yet been endorsed by FSC.
- 1.4 There has also been some confusion as to the status of locally adapted generic standards developed by certification bodies in regions in which a regional Forest Stewardship Standard is subsequently endorsed.

#### 2 FSC Position

- 2.1 FSC's position is currently defined in the FSC Accreditation Manual (January 1998), Part 3.2 Section 2. In essence, until a regional Forest Stewardship Standard has been formally endorsed by the FSC Board, certification bodies are required by FSC to carry out certification according to their own 'generic' standard, which has been evaluated and approved by the FSC Board. Certification bodies may supplement this standard using additional requirements or recommendations, but may not remove elements that are specified as requirements of the 'generic' standard.
- 2.2 Certification bodies are required to liaise with any national or regional FSC Initiative involved in the development of a national or regional Forest Stewardship Standard. Certification bodies are required to encourage local input to and comment on their 'generic' standard and to take into account any inputs on their generic standard. Identified stakeholders must be informed at least one month prior to the main assessment evaluation taking place of procedures for developing the 'locally adapted generic standard'. This 'locally adapted generic standard' must be finalised through meaningful accommodation of stakeholder concerns prior to the certification assessment audit commencing in High Conservation Value Forests. For all other forest certifications, the 'locally adapted generic standard' must be finalised and circulated at least one month prior to the certification decision.

- 2.3 The FSC Accreditation Manual explicitly requires the certification body to demonstrate how any draft national or regional Forest Stewardship Standard under development in the country or region concerned was taken into account. Nevertheless, the certification body is not obliged to follow the proposals made in such a draft standard.
- 2.4 FSC-accredited certification bodies are encouraged to collaborate with national or regional FSC Initiatives in using or testing elements of draft national standards.
- 2.5 In the past some problems have arisen because the structures of draft regional Forest Stewardship Standards and certification bodies' interim standards have been incompatible. FSC now requires that all certification body 'generic' standards and FSC endorsed regional Forest Stewardship Standards are structured according to the ten (10) FSC Principles and Criteria.
- 2.6 This issue is discussed in detail in the paper '*Implementation of the FSC Principles and Criteria for Forest Stewardship*' dated 28 January 1998 (and see Section 2.13: 'Certification Thresholds, above, for further details).

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.18: Sampling

Updated: June 1998

#### 1 Background

- 1.1 On-site evaluations by certification bodies must be sufficient in their scope and intensity so as to provide an adequate factual and observational basis for reaching a certification decision.
- 1.2 It is not possible to provide specific guidance as to the number or percentage of samples that are required in the field to evaluate an operation of a given size. The variability between management areas is too great, and the number of samples required will depend greatly on the homogeneity of management within the area, the complexity of the management situation, and the efficiency with which management policies and practices are documented by the enterprise under evaluation.
- 1.3 When evaluations are likely to be large or complex it is strongly recommended that certification bodies undertake a scoping visit prior to formal evaluation. The scoping visit will permit a more developed proposal for a sampling strategy, and a better estimate for the number of sample sites that will be required for a full evaluation.

#### 2 FSC Position

- 2.1 Certification bodies are required to prepare general guidelines for use by assessors for the determination and implementation of an appropriate sampling strategy. This section provides some guidance as to the basic requirements of such a strategy.
- 2.2 In designing the sampling strategy the assessors must first determine and specify the underlying units, each of which must fully comply with the *FSC P&C*. For group certifications the underlying units must be individual group members (typically, individual properties or owners). Large enterprises may be evaluated as single enterprises, as group evaluations, or as a number of separate and independent units (see section on 'Partial certification of large enterprises', above). Performance on each element of a Forest Stewardship Standard must be evaluated at the level of the unit. A high level of performance on one unit does not compensate for a poor level of performance by another unit.
- 2.3 A unit may in turn be subdivided into a variety of sites, based for example on forest type, management objectives, location, management subdivision, etc.. Performance on different elements of a Forest Stewardship Standard at different sites within a unit should be combined to reach a single conclusion for performance on that element for the unit. A high level of performance at one site may compensate for a poor level of performance at another site. If the overall level of performance is sufficient at the unit level, a certificate may be awarded.
- 2.4 The sampling strategy must ensure that each unit that is evaluated complies with the FSC P&C. Units may be grouped together in strata for the purpose of group certification (see below).

- 2.5 The intensity of sampling and inspection of sites within each unit will be decided by the certification assessment team, according to the variability of management practice, operations, forest communities, ecosystems and environments in the unit area, taking into account the experience and confidence of the evaluation team and the reputation of the enterprise (see subject 2.22: 'Size of evaluation teams and number of evaluation days', for further details).
- 2.6 Sites must be selected to ensure that a sufficient variety of management areas (e.g. management subdivisions, forest communities), management objectives (e.g. with respect to different forest types, ecosystems, reserved areas, amenity areas) and management operations (e.g. current harvesting, recent harvesting, recent re-planting or regeneration, older replanting or regeneration, etc.) are visited to provide an adequate factual and observational basis to reach a certification decision at the unit level.
- 2.7 Selection of sites should concentrate on the probable critical aspects of the forest management system, and on the locations where failures are most likely.
- 2.8 Sampling of multiple units for group certification.
- 2.8.1 The level of sampling to take place during an initial evaluation must be determined by the certification body, taking into account case specific conditions.
- 2.8.2 For large populations (typically more than 100 members) the evaluation team should concentrate on deciding the number of samples needed to produce a reliable assessment, rather than working with a fixed percentage. Sequential random sampling systems sufficient to demonstrate compliance with the FSC P&C across the full range of strata in the population are acceptable.
- 2.8.4 For smaller populations (typically less than 100 members) sampling should ensure that at least one third of separate forest areas are visited by at least one evaluation team member during the initial evaluation. Sampling below this level must be explicitly justified in the evaluation report.
- 2.8.5 Reduced sampling levels must be based on a clearly justified stratification in terms of:
- a. geographic homogeneity (e.g. units of one forest type); *and/or*,
  - b. management homogeneity (e.g. silvicultural system, management system, personnel involved in aspects of management).
- 2.8.6 The level of sampling within each stratum should be determined, and clearly justified in the certification report, in terms of:
- a. potential environmental or social impacts of operations within the stratum (operations/sites with a high potential impact must receive a high level of sampling);

- b. the proven strength of monitoring systems implemented by the applicant for certification (data provided by such an internal monitoring system may supplement site visits by the evaluation team).
- 2.8.7 The evaluation team leader should determine the extent to which a team should divide its resources in terms of time and personnel between separate forest units and sites within those units. The basis for this division and the methods for ensuring consistency in observations must be described in the certification report.
- 2.8.8 Each group member that is sampled must be evaluated to ensure compliance with all the requirements of the *FSC P&C*. Some properties will not be selected for evaluation by the certification body, but the properties that *are* selected for evaluation must fully meet the *FSC P&C*. Administrative and policy requirements of forest stewardship that apply to the whole group (e.g. management planning, inventory and monitoring) may be implemented at the 'group' level or by individual group members. Requirements that are implemented in the forest (e.g. maintenance of habitats, streams, species diversity) must be implemented by every group member on an individual basis, appropriate to the size and complexity of the forest area concerned. Responsibilities for meeting criteria may not be 'traded' between different ownerships, e.g. with one owner meeting conservation objectives whilst another does not. This is illustrated in figure 1, below, in which the shaded areas show the areas sampled and evaluated.

GROUP ENTITY	Group entity requirements (see FSC Guidelines for Group Certification)			
	Forest Management policies and procedures applicable to all group members (meeting <i>some</i> of the FSC Principles and Criteria for <i>all</i> group members).			
GROUP MEMBERS	MEMBER 1	MEMBER 2	MEMBER 3	MEMBER N
	Forest management responsibilities undertaken by individual members, meeting <i>all</i> the FSC Principles and Criteria that are not already met at the group level	Forest management responsibilities undertaken by individual members, meeting <i>all</i> the FSC Principles and Criteria that are not already met at the group level	Forest management responsibilities undertaken by individual members, meeting <i>all</i> the FSC Principles and Criteria that are not already met at the group level	Forest management responsibilities undertaken by individual members, meeting <i>all</i> the FSC Principles and Criteria that are not already met at the group level

**Figure 1**

2.8.7 Membership of a group, of itself, implies no special reduction in the level of sampling required to evaluate forest stewardship. Any reductions in the level of sampling must be the result either of a reduction in the level of uncertainty as the result of the group's internal monitoring procedures, or due to the special homogeneity of the group itself (e.g. a single forest type, a single resource manager, etc.). Such considerations have little impact for groups of diverse properties managed by diverse individuals. FSC does not expect such groupings to provide significant benefits in terms of reduced requirements for sampling. However, these considerations will have a major impact for groups of relatively uniform properties managed within a uniform framework.

2.8.8 In some examples of group certification the major benefit of the grouping has been to reduce administration and organisational costs, and to share travel costs for an evaluation. Relatively few of the forest management responsibilities have been shared at the group level. In these cases a very high sampling rate has been used, sometimes with every group member being evaluated and monitored annually (i.e. 100% sampling). This is what FSC would expect given the considerations outlined above. In these cases the distinction between group certification and multiple independent certification may become blurred. The essential difference is that for multiple independent evaluations each forest unit holds its own certificate in its own name. The behaviour of other forest managers has no effect on the validity of the

independently held certificate. In the case of 100% sampling under a group certification structure the group members could decide to hold individual certificates, and would then take on full responsibility for all aspects of their forest management.

2.8.9 Group certification is now being introduced into a wide variety of different management and ownership situations. Managers, assessors and FSC are still learning from these new situations. FSC's guidelines and administrative requirements aim to remain flexible whilst ensuring the reliability and credibility of certificates and market claims. Certification bodies should consult with the FSC Secretariat in case of doubt.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.19: Stakeholder consultation

Updated: June 1998

#### 1 Background

- 1.1\_ Stakeholder consultation may be designed to achieve a number of different objectives in different circumstances (for a discussion of this, see 'Certification of Forest Products: issues and perspectives. ed V.M.Viana et al. (1996) Island Press, pp14-16).
- 1.2 There has been some confusion as to the objectives of stakeholder consultation in the context of forest evaluations for certification.

#### 2 FSC Position

- 2.1 FSC considers that the main objectives of the consultation are:
  - 2.1.1 to solicit comments on any generic or interim standard being used by the certification body for an evaluation;
  - 2.1.2 to identify forest stewardship issues which are considered difficult or controversial in the region concerned;
  - 2.1.3 to gain an understanding of the opinions of stakeholders, and in particular local stakeholders, as to how they believe these issues should be resolved;
  - 2.1.4 to gather information about the performance of the forest management enterprise with respect to the Forest Stewardship Standard being used for the evaluation. Such information may include instances of disputes between the forest managers and other stakeholders, examples of non-compliance with Forest Stewardship Standards, and also general opinions (positive and negative) about the standing of the forest management enterprise in the community or region.
- 2.2 FSC does not require certification bodies to ensure that there is a consensus amongst all stakeholders as to how difficult or controversial issues should be resolved.
- 2.3 FSC does not require certification bodies to agree with the opinions of stakeholders, or comply with stakeholders' recommendations as to whether an operation is certifiable or not. The duty of the certification body is to determine whether the specified Forest Stewardship Standard is, or is not, complied with by the client. Consultation does not imply a right to veto a certification decision. A stakeholder who feels that the certification decision is incorrect may make a complaint/appeal to the certification body, and complain to FSC.
- 2.4 FSC-accredited certification bodies are required to develop and document standard methodologies for conducting stakeholder consultations.

- 2.5 The FSC Accreditation Manual (January 1998) Part 3.2 Section 7 specifies the basic requirements for stakeholder consultation that must be carried out by a certification body for a forest management evaluation.
- 2.6 Consultation must be designed to include "local or national government and non-government organisations involved in forest management, and which represent a range of legal, social, ecological and economic perspectives". FSC has not specified any particular minimum number of stakeholders to be contacted. This is left to the professionalism and experience of the certification body.
- 2.7 FSC endorsed National Initiatives (including Contact Persons and Working Groups) that are active in the region concerned must be informed when a contract or equivalent agreement to carry out an evaluation has been signed by the forest management enterprise, and must be consulted with during the evaluation.
- 2.8 FSC can facilitate the process of local consultation through its programme of National Initiatives. In particular FSC Contact Persons can provide certification bodies with:
- 2.8.1 information about national/regional standards development;
  - 2.8.2 copies of draft or approved national/regional Forest Stewardship Standards;
  - 2.8.3 contact details of potential stakeholders and consultees for forest evaluations;
  - 2.8.4 up to date information about important forest stewardship issues.
- 2.9 In evaluating certification reports, FSC is looking to ensure that:
- 2.9.1 an appropriate range of stakeholders were consulted;
  - 2.9.2 stakeholders had the opportunity to present their points of view without fear or recriminations;
  - 2.9.3 there is evidence that their opinions with respect to any generic or interim standard were taken into account during the evaluation;
  - 2.9.4 information and opinions of stakeholders are presented;
  - 2.9.5 information and opinions of stakeholders were evaluated in coming to a certification decision.
- 2.10 As evaluation reports are submitted to the evaluated operation, the Secretariat considers that in general the certification body should NOT identify in writing the opinions of individual stakeholders, but should present this information under the general heading of 'stakeholder opinions', and as appropriate in the text.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.20: Products of land clearance

Updated: June 1998

#### 1 Background

- 1.1 Trees may be cleared from land for a variety of reasons, many of which are economically, socially or environmentally benign: for example, removal of encroaching scrub from pastureland, conversion to agriculture within an approved land management plan, removal of invading exotic species from unforested land, salvage of timber before or after dam construction.
- 1.2 Convincing arguments may be made as to the positive environmental or other impacts of these operations.

#### 2 FSC Position

- 2.1 FSC exists to support forest stewardship. Whilst there are many environmentally benign sources of timber, if they are not derived from forest stewardship they are not eligible for certification under the FSC system.
- 2.2 Certification bodies may operate separate certification programmes for, for example, salvaged or recycled wood. In this case they must discuss the proposed programme with the FSC Secretariat prior to implementation. The FSC Secretariat will evaluate the programme to determine whether there is a risk of public confusion as to whether such a programme is FSC endorsed or not, and on that basis agree whether the programme compromises the conditions of FSC accreditation or not.
- 2.3 Wood from non certified sources may still be included in products that carry the FSC Trademark. In the case of composite products up to 30% of the virgin wood in the product may be non-certified. Up to 75% of the fibre in a product may be recycled. Further details are provided in FSC Policy for percentage based claims.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.21: Very small private forests

Updated: June 1998

#### 1 Background

- 1.1 Individual certification is already accessible for larger private forests. Under group certification schemes it is accessible for many small forests based on Associations, indigenous community management or on common management supervision. However certification is not yet perceived as accessible, realistic or cost-effective for very small private forests, especially where effective, formal associations do not exist. FSC is therefore seeking additional ways to facilitate access for products from very small private forests into the market for certified products.

#### 2 FSC Position

- 2.1 Current rules for labelling forest products with the FSC Logo allow up to 30% of the virgin wood or fibre in product to come from non-certified sources, including small private forests.
- 2.2 A new proposal under consideration is:
- 2.2.1 FSC National Initiatives agree to a size limit for 'very small forests', suitable for each country or region. It may vary widely, from one to several hectares. If necessary, different size limits may be applied to planted woodlots, indigenous forests, agro-forestry, windbreaks, etc..
- 2.2.2 A responsible local or regional entity will be asked to compile a list of all the VSF's or localities which, in the opinion of this entity or official, comply with forestry laws or regulations. The responsible entity may be a forestry or owners association or cooperative, an NGO or other agreed by FSC. The list will not imply independent evaluation, compliance with all P&C, or endorsement by FSC.
- 2.2.3 Products marketed from these listed forests may be considered 'neutral' (not requiring certification) for purposes of product labelling, marketing and percentage-based claims, equivalent to recycled paper. Industries and pulpmills may therefore continue to incorporate them, up to certain fixed proportions, into finished products, and then make percentage-based claims. Farm products and agro-forestry products will be added to the list of neutral sources in the guidelines for percentage-based claims.
- 2.3 This proposal is not approved by the FSC Board, and cannot at present be implemented. Comments are welcomed.

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# FSC Guidelines for Certification Bodies

## Part 2: Forest Certification

### Subject 2.22: Size of evaluation teams and number of evaluation days

Updated: June 1998

#### 1 Background

- 1.1 All evaluations by certification bodies must be "sufficient in scope and intensity as to provide an adequate factual and observational basis for reaching a certification decision" (FSC Statutes: Appendix A, paragraph 3.2).
- 1.2 Certification bodies are under competitive pressure to minimise the costs of evaluations. There have been occasions when NGOs have been concerned that the pressure to reduce costs has led to certification bodies reducing the number of field days excessively.

#### 2 FSC Position

- 2.1 Certified forests vary dramatically in terms of their size, complexity, and intensity of management. The requirements in terms of time and personnel required to evaluate these forests are very different.
- 2.2 The smallest certified forest was less than one hectare in size. The largest certified forests are more than 300 000 hectares in size. The range of person days required for evaluations, has varied from 1 - 2 person days for small, well documented and accessible management situations, up to 50+ person days for large, complex evaluations of groups of inaccessible applicants. Annual monitoring similarly has varied from 1 person day up to around 20 day person days.
- 2.3 Some forests are managed mainly for conservation objectives. Where forest management is at a low intensity, and protective measures are in place, there is a reduced requirement for intensive evaluation of some aspects of forest management. Other forests are managed intensively, and may be harvesting close to the maximum sustainable yield in some areas. If the forest management plan is close to such limits additional scrutiny is required to ensure that the limits are not in fact exceeded.
- 2.4 Some forests have relatively simple social impacts, perhaps limited to the forestry personnel directly involved in managing the forest, and uncontroversial impacts on neighbouring communities. Other forests have complex and sometimes controversial relationships with communities living near to, as well as in, the forest itself. Where social factors are complicated and widespread additional time and specialised skills are required to evaluate them.
- 2.5 Access to and within forests also varies dramatically. In one case three days was required simply to reach the forest, by plane, boat and foot. In some cases roading within the forest allows rapid access to a sufficient variety of sites to permit thorough evaluation. In other forests most access may be by foot. Clearly the degree and ease of access will affect the time required for the evaluation.

- 2.6 Where forest management is supported by accurate and accessible records, documentation and maps, field visits have the role of confirming such documentary evidence. This may lead to a reduction in the time spent in the field due to reduced sampling requirements. In contrast, where management is poorly documented field visits may be the only source of data, and so there is an increased requirement for sampling sites in the forest.
- 2.7 Given the wide variation in conditions, the FSC Secretariat does not consider that detailed prescriptions for time to be spent by certification bodies in country or in the field would be helpful or appropriate.
- 2.8 FSC requires that evaluation teams have personnel sufficiently qualified to evaluate the social, environmental and economic impacts of the forest being evaluated, in order to ensure compliance with the FSC Principles and Criteria. FSC does not require that separate individuals are required to evaluate each aspect of the Principles and Criteria. The minimum requirement is a single person, with an appropriate range of experience and expertise. In other cases evaluation teams have included four or five personnel with specialist skills in different aspects of forest management and management impacts.
- 2.9 Experience has shown that the shortest amount of time it is possible to spend in a forest in order to evaluate compliance with the FSC Principles and Criteria is about half a day, supplemented by office evaluation of documentation. The longest time in the forest may be two to three weeks, with a multidisciplinary team evaluating different aspects of management. Such long evaluations are usually preceded by shorter 'scoping' visits, at which an initial opinion may be given as to whether a full evaluation is justified, and as to which areas of management may require further effort in order to comply with the FSC Principles and Criteria.
- 2.10 FSC monitors certification reports, and carries out annual field visits to certified sites. One purpose of these visits is to determine whether the certification body's evaluation was sufficient in scope and intensity to provide an adequate basis for a certification decision. If it was not, then FSC has the right to issue appropriate Corrective Action Requests, or, if required, to recommend withdrawal of FSC accreditation.

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# **PART 3:**

## **Chain of Custody Certification**

# FSC Guidelines for Certification Bodies

## Part 3: Chain of Custody Certification

### Subject 3.1: Joint forest/chain of custody certificates

Updated: June 1998

#### 1 Background

- 1.1 FSC offers accreditation for certification of forest management that conforms with the FSC P&C (forest certification), and/or certification that the wood or non-wood material in a specified forest product is from a forest that has been certified by an FSC-accredited certification body (chain of custody certification).
- 1.2 Forest certification provides a guarantee regarding quality of management. Chain of custody certification provides a guarantee regarding the source of material in a product. In order for a product to carry the FSC label, it must be covered by a chain of custody certificate.
- 1.3 There has been some confusion as to whether forest managers who wish to sell their products as certified require a chain of custody certificate in addition to their forest management certificate.

#### 2 FSC Position

- 2.1 FSC has a very clear position on this issue. Products from forests that have only a forest management certificate are NOT eligible to enter into subsequent chains of custody, and are NOT eligible to carry the FSC Logo.
- 2.2 The reason for this is straightforward. Many enterprises both manage their own forests and also buy logs or sawn timber from other forests. This may be in order to maintain production at their own saw mill, or in order to meet an order for timber they do not have available at a particular time. The fact that a forest management enterprise has been certified for forest management does NOT necessarily mean that all the products supplied by that enterprise come from its own forest.
- 2.3 FSC could require every forest manager to have both a forest management and a chain of custody certificate. However some forest managers do not wish to sell FSC labelled produce. They may have applied for certification in order to demonstrate their forest stewardship to a funding organisation or for public recognition, and not in order to market their products. Forest managers may also wish to ensure that they have achieved certification of their management before incurring any additional costs associated with chain of custody certification of their production lines.
- 2.4 FSC therefore allows forest managers the choice of applying for forest management certification only (in which case their products are not eligible to enter subsequent chains

of custody as certified material), or of applying for joint forest management and chain of custody certification (in which case their products are eligible to be carry the FSC Logo, and to enter into subsequent chains of custody as certified material).

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# FSC Guidelines for Certification Bodies

## Part 3: Chain of Custody Certification

### Subject 3.2: Exclusive certificates

Updated: June 1998

#### 1 Background

- 1.1 Forest management evaluations have often been paid for, wholly or partly, by organisations other than the forest management enterprise being evaluated, for example by NGOs, retailers or product manufacturers. This can lead to confusion as to who has the right to make use of the certificate. For example, if a forest management evaluation has been paid for by a product manufacturer who buys wood from that forest, can that manufacturer prevent the forest owners supplying 'certified' wood to other manufacturers? Can a certification body issue a certificate that gives exclusive rights to the party that paid for the certificate, rather than the forest owner/manager?

#### 2 FSC Position

- 2.1 The Secretariat considers that when a forest management certificate is issued, the obligations and rights related to that certificate must rest entirely with the forest managers/owners, independent of the party that paid for the evaluation. Certificates must be issued in the name of the forest owners/managers with whom the obligations and rights rest.
- 2.2 FSC-accredited certification bodies may not issue certificates that limit the rights of certificate holders to sell or market their products as 'certified'.
- 2.3 If the party that pays for the evaluation is not the owner/manager of the forest enterprise, then it is the responsibility of that party to agree with the owner/managers any special conditions relating to the exclusive use or marketing of products.
- 2.4 In the case of group certifications the obligations and rights related to the forest management certificate rest with the group certificate holder. The certification body must ensure that the group certificate holder has the appropriate management authority to ensure that these obligations are met. It is the responsibility of the group certificate holder to agree with the owners/managers any special conditions relating to exclusive use or marketing of products.
- 2.5 The Secretariat considers that a forest owner/manager who wishes to enter into some kind of exclusive agreement with another party may do so without the involvement of FSC or the certification body. The forest owner/manager has the mechanism to do this by determining whether or not invoices are issued with the forest management enterprise's joint forest/chain of custody certificate registration code. Only those products sold against invoices quoting the chain of custody code can enter into subsequent chains of custody, and be manufactured into FSC labelled products.

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# FSC Guidelines for Certification Bodies

## Part 3: Chain of Custody Certification

### Subject 3.3: Out-sourcing

Updated: June 1998

#### **1 Background**

- 1.1 Many forest product manufacturers outsource particular jobs (for example, making mouldings of a specified dimension) in order to meet their customers' requirements. It is common for such manufacturers to outsource work on a flexible basis to any one of a number of potential contractors. If the contractors all have to have chain of custody certificates in their own right then this reduces the manufacturer's flexibility, and increases costs.
- 1.2 The basis of outsourcing discussed below is that the company being certified has taken ownership of the certified product, does not relinquish ownership whilst the product is undergoing outsourced processing, and takes possession of the product again after such processing.

#### **2 FSC Position**

- 2.1 FSC requires that a certification body accredited by FSC for chain of custody certification must have developed a written standard (or equivalent), which specifies the requirements that a supplier is evaluated against, and which must comply fully with the FSC requirements specified in Part 3.6 of the FSC Accreditation Manual.
- 2.2 The requirements in Part 3.6 of the FSC Accreditation Manual specify that the company must have a clearly documented control system addressing all the specified principles of chain of custody control. These principles do not prohibit the company outsourcing materials.
- 2.3 If the company does outsource material, it must do so under a documented control system which meets all the requirements specified. It is the work of the certification body to evaluate the documented control system to determine whether there is a risk of uncontrolled mixing of certified and non-certified products. Clearly, outsourcing creates such risks. The company must therefore be able to demonstrate how the risks are controlled. The certification body must be satisfied that the risks have been controlled, and the the certification body can monitor the chain of custody to ensure that it is not breached.

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# **FSC Guidelines for Certification Bodies**

## **Part 3: Chain of Custody Certification**

### **Subject 3.4: Timber brokers**

**Updated: June 1998**

#### **1 Background**

- 1.1 Timber is often bought by brokers, and then resold. The timber may not in fact be physically moved by the broker. Only possession changes. Does the broker require a chain of custody certificate in order to sell the timber as certified?

#### **2 FSC Position**

- 2.1 The basis by which a buyer can demonstrate to a certification body that a shipment of timber is certified is the chain of custody certificate registration number on the invoice for the shipment.
- 2.2 When a broker buys and resells timber, a new invoice is issued. In order to prove that the timber is certified, the broker must therefore be in possession of a valid chain of custody certificate, and must quote the registration number for the certificate on its invoice. Brokers do require their own chain of custody certification in order to sell timber as certified, or for it to be eligible to enter into further chains of custody.
- 2.3 When a certification body evaluates a broker for chain of custody, the certification body must be satisfied that a documented system is in place which allows the chain of custody to be evaluated. In the case of brokers the system will be evaluated by a considering both records and visits to yards where certified timber is physically stored.

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# FSC Guidelines for Certification Bodies

## Part 3: Chain of Custody Certification

### Subject 3.5: Multiple link chain of custody certificates

Updated: June 1998

#### 1 Background

- 1.1 Many finished forest products are the result of processing by a number of different manufacturers.
- 1.2 The pressure from a retailer to provide a certified product may be directed only at the manufacturer at the end of the supply chain, who delivers the finished product to the retailer. Such a manufacturer may be prepared to pay for the certification of the whole chain, from forest to final product, in order to meet the retailer's product requirements.
- 1.3 Can such a manufacturer be issued with a single certificate, covering the chain of custody through several links of the supply chain?

#### 2 FSC Position

- 2.1 At each link in the supply chain particular managers must be responsible for ensuring the integrity of the chain of custody. Experience shows that when a single certificate covers several links, and when the managers at each part of the link are not directly responsible to the company holding the certificate, the risk that the chain of custody breaks down is unacceptably high.
- 2.2 Certification bodies may not therefore issue certificates that cover more than one link in the chain of custody. Certificates must be issued to the company that has direct management responsibility for the system of chain of custody under their control.
- 2.3 A manufacturer may of course pay for earlier links in the chain of custody to ensure a supply of certified product. In such case a manufacturer may enter into exclusivity arrangements with his own suppliers, in exchange for paying for the chain of custody control. The certification body may not however issue 'exclusive' certificates (see subject 3.2, above).

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# FSC Guidelines for Certification Bodies

## Part 3: Chain of Custody Certification

### Subject 3.6: Scope of chain of custody certificate

Updated: June 1998

#### 1 Background

- 1.1 Forest product manufacture is a continuous process. At the time that a certificate is issued there are likely to be products undergoing manufacture, products that have been manufactured but not yet shipped, and products that have been shipped but not yet put on sale by the buyer. Which of these products are eligible to carry the FSC Logo?

#### 2 FSC Position

- 2.1 The FSC Accreditation Manual (Part 3.5) specifies the requirements for chain of custody certification reporting. A basic requirement of the evaluation, and the evaluation report, is that the scope of the certificate is defined.
- 2.2 The scope of the certificate defines the point at which the certified chain of custody starts, and the point at which it finishes. The chain of custody certificate provides a guarantee of the chain of custody in between those points. This guarantee is valid from the time that the certificate is issued. Any product which is within the defined scope of the certificate, and meets the requirements of the chain of custody control system at the time the certificate is issued can be sold as certified. Products which have already left the scope of the certificate at the time the certificate is issued are not certified.
- 2.3 Normally this will mean that products that have already been sold, or shipped, prior to the issue of a certificate may not be described as certified, and are not eligible to carry the FSC Logo.
- 2.4 Clearly a company cannot issue an invoice describing products as certified prior to the issue of chain of custody certificate. Products sold without such an invoice cannot be described as certified, and are not eligible to carry the FSC Logo.
- 2.5 In the case of joint forest management and chain of custody certification, application of this guideline means that timber that had been felled prior to the issue of a certificate, but which has not yet been sold by the forest management enterprise may be sold as certified.
- 2.6 Equivalent considerations apply when a certificate is withdrawn or expires. Products which left the chain of custody whilst the certificate was valid were certified, and remain certified even after the certificate has been withdrawn. Products which have not yet left the chain of custody at the time the certificate is withdrawn will not be certified.

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# **FSC Guidelines for Certification Bodies**

## **Part 3: Chain of Custody Certification**

### **Subject 3.7: Certified systems without certified wood**

**Updated: June 1998**

#### **1 Background**

- 1.1 Chain of custody certification is based on the evaluation of a documented control system, combined with evaluation of physical methods for the identification and separation of certified from non-certified materials. In principle such a system may be evaluated on the basis of separation of different types of non-certified wood, as well as on the basis of the separation of certified from non-certified material. Can a certificate be issued before certified stock is available?

#### **2 FSC Position**

- 2.1 If the certification body is satisfied that an operational chain of custody control system is in place, then a chain of custody certificate may be issued before the company is in receipt of certified material.
- 2.2 Clearly the company cannot sell any product as certified until products have been made from certified material.
- 2.3 Certification bodies are advised to visit companies as soon as certified material is available to ensure that the system of identification and separation of certified and non certified stock is fully implemented in practice.

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# **PART 4:**

# **Certification Reports**

# FSC Guidelines for Certification Bodies

## Part 4: Certification Reports

### Subject 4.1: Use of checklists

Updated: June 1998

#### 1 Background

1.1 Reports on certified forest management enterprises are of paramount importance for certification, as described in the FSC Accreditation Manual (Part 3.2 Section 10). FSC therefore provides detailed requirements with which all certification reports must conform (FSC Accreditation Manual Part 3.3 Section 2).

1.2 Nevertheless there is still some uncertainty about the amount of detail that certification bodies are expected to present in certification reports. The purpose of this section is to provide some general guidance.

#### 2 FSC Position

2.1 Checklists are a useful and efficient way of ensuring that an assessor has evaluated all necessary aspects of a candidate for certification. Checklists help the assessor work systematically in the field, and create a document in which the assessor accepts responsibility for having evaluated particular aspects of an operation.

2.2 However many decisions in forest management and in evaluation are guided by professional judgements in the context of local, national and regional conditions. Such decisions require explanation and justification that is not provided by a simple checkmark against a checklist.

2.3 Checklists may provide crucial support for a certification report, but they do not replace a report. Checklists must be supported by specific observations, explanations and references that allow the reader to form an independent judgement as to whether the evaluation was rigorous and consistent in implementing the certification system, and whether the forest management observed meets the FSC Principles and Criteria.

2.4 In requiring certification bodies to present their observations, explanations and references in the form of a report, FSC differs from some other accreditation systems. FSC considers that this difference relates to the particular challenges presented in the evaluation of forest stewardship, and is a necessary requirement for a credible and effective forest certification system.

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# **FSC Guidelines for Certification Bodies**

## **Part 4: Certification Reports**

### **Subject 4.2: Translation of reports**

**Updated: February 2002**

#### **1 Background**

- 1.1 FSC must be able to evaluate and monitor certification activities effectively. To do this it must be able to understand certification systems, and forest management and chain of custody evaluation reports. These reports and documents must therefore be translated into languages that appropriate FSC personnel can understand. Also, as the summary reports are made available to the public, they must be available in the main native language/local official language(s).
- 1.2 In order to accept reports or other documentation in languages other than English or Spanish FSC must do one or more of the following:
  - 1.2.1 commit to ensuring that FSC staff can review reports in whatever language they are submitted in;
  - 1.2.2 delegate review of reports to non FSC staff who speak the language concerned;
  - 1.2.3 commit to translating reports received in languages that are not understood by FSC staff, into languages that are understood;
  - 1.2.4 translate reports on an 'as needs' basis, for example only after an operation has been selected for FSC monitoring.
- 1.3 None of these options is entirely satisfactory. Each option creates operational/quality difficulties and/or significant costs for FSC.

#### **2 FSC Position**

- 2.1 Forest and Chain of custody evaluation reports must be translated by the certification body into one of FSC's official languages, prior to a certificate being issued. These languages are currently English and Spanish.
- 2.2 Certification monitoring reports must be translated into one of FSC's official languages within 90 days of the monitoring visit being completed.
- 2.3 FSC recognises that this imposes costs on certification bodies operating in languages other than English or Spanish. FSC is seeking alternative solutions to the recognised difficulties.
- 2.4 The certification summary reports, which are made available to the public, must be available as well in the main native language/local official language(s).

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# **FSC Guidelines for Certification Bodies**

## **Part 4: Certification Reports**

### **Subject 4.3: Presentation of supporting documents**

**Updated: June 1998**

#### **1 Background**

- 1.1 In carrying out a forest evaluation the certification team will typically review a considerable quantity of supporting documentation, such as management plans and policy documents. To what extent does the certification body need to present this material in its certification report?

#### **2 FSC Position**

- 2.1 The certification report should be a free standing document which allows the reader to form an independent judgement with respect to the forest management enterprise's compliance with the FSC Principles and Criteria.

- 2.2 Broadly speaking, the certification report may:

2.2.1 Quote key passages of supporting documentation;

2.2.2 Summarise key passages of supporting documentation;

2.2.3 Provide references to key passages of supporting documentation, and include a copy of the documentation as an annex to the report.

- 2.3 The certification body should exercise its judgement as to what combination of these techniques are most appropriate in particular circumstances.

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