



Forest Stewardship Council®



Report on the Structure of the FSC Certification System

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1. Structure of the certification system

The Forest Stewardship Council (FSC) sets standards for forestry operations whose managers want to comply with good management practices, and for producers and traders of forest products who want to source from these suppliers and communicate this to their customers. Two sets of standards have therefore been developed:

- forest management (FM) standards, which set rules for forest operators to comply with responsible forest management requirements
- chain of custody (CoC) standards, which set requirements for the verification of FSC-certified materials and products along the production chain from the forest to the end buyer/consumer.

Companies can hold FM certification, or CoC certification, or both. FSC does not issue certificates itself but uses independent third-party certification to obtain impartial certification decisions. Independent certification bodies (CBs) carry out annual FM and CoC audits and issue the FSC certificates.

FSC also defines the procedures that certification bodies must follow in their certification audits and quality management. The [FSC Accreditation Standard](#) (FSC-STD-20-001) provides the general rules and requirements for the CBs. Together with other more specific standards (e.g. for FM evaluations, CoC evaluations, stakeholder consultation, and FM certification reports), this standard sets the rules and requirements for the FM and CoC audit processes, the duration of certificates, the frequency of audits, requirements for audit of group certification and stakeholder involvement.

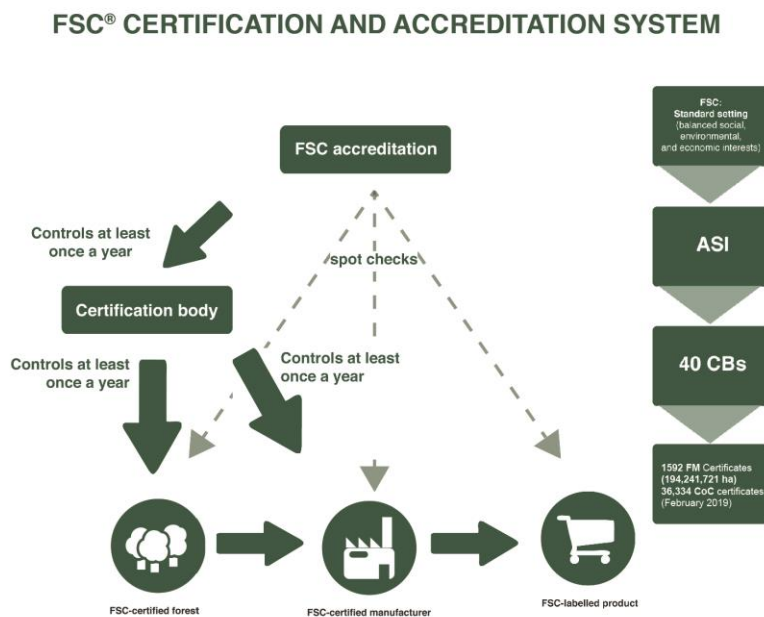


Figure 1: FSC certification and accreditation system

To ensure that these rules are followed, CBs have to be accredited by Assurance Services International (ASI)¹. So, in the same way that CBs carry out annual checks on certificate holders (CHs), ASI carries out annual checks on the CBs, through office and field audits. ASI has a service agreement with FSC and reports every quarter on its achievements.

¹ A current list of FSC accredited certification bodies, and respective contact details, is available on the ASI website: <http://www.asi-assurance.org/s/find-a-cab>

2. List of standards applied in the accreditation and certification system

FSC has a system of normative documents (policies, standards, and procedures) that are applied in FM and CoC certification processes. This section explains the most important documents for the FSC assurance system, in addition to those mentioned in the previous section.

The *FSC Accreditation Standard* sets the rules for CBs and comprises all applicable ISO 17065 requirements.

Stakeholder engagement is at the heart of FSC, which requires that stakeholder consultation starts in the pre-evaluation phase of FM certification. CBs have to actively identify and approach stakeholders at least six weeks prior to the start of the main audit site visits, to request their views and opinions and make arrangements for a stakeholder meeting during the audit. Additionally, stakeholders can apply to participate as external observers in on-site FSC certification audits, and they have access to FM certification report summaries via the FSC certificate database (<http://info.fsc.org/>). This is regulated in *Stakeholder Consultation for Forest Evaluations* (FSC-STD-20-006) and *Participation of External Observers in On-site FSC Certification Audits and/or ASI Assessments* (FSC-PRO-01-017).

ASI announces all upcoming audits of its accredited CBs through a mailing list and via the [ASI website](#), and stakeholders are invited to comment on the CB's performance.

The FSC dispute resolution system (DRS) is regulated through *Processing Complaints in the FSC Certification Scheme* (FSC-PRO-01-008). It adheres to ISO regulations and gives stakeholders the opportunity to express any concerns they may have with certification decisions, the performance of CHs, or other aspects of the FSC scheme. FSC encourages stakeholders to first try to resolve disputes informally through dialogue, before submitting a complaint or appeal. A key principle of the FSC DRS is that disputes should be addressed at the lowest level possible, meaning between the parties most directly involved in the issue. Only when resolution fails at the lowest level should the next highest level be engaged. This implies that complaints against a CH should first be sent to that CH. If the complainant is not satisfied by the CH's response, the complaint can be elevated and submitted to the CB that issued the certificate. Complaints against a CB, or against ASI, are dealt with accordingly and can be elevated to ASI or FSC respectively. As a consequence, CBs and ASI are required to have their own DRS and to make this publicly available. The FSC DRS procedures and online submission form are accessible through the [FSC website](#).

FSC has a structured process for the development, review, and revision of its normative documents, defined in *The Development and Revision of Normative Documents* (FSC-PRO-01-001), and maintains a five-year review and revision cycle. During the revision of policies, standards, and procedures, the following information is taken into account: new or changed legislation or best practices; emerging technologies or scientific knowledge; results of FSC and ASI monitoring and evaluation activities, e.g. implementation problems, competitive advantages, or threats; evaluation of change requests; and existing interpretations and advice notes to be incorporated. The revision process of normative documents with social and environmental requirements is conducted by a working group with balanced representation of economic, environmental and social stakeholders, and includes a number of stakeholder consultations before the revised document is sent to the FSC Board of Directors for formal approval.

FSC conducts a global market survey every two years, addressing questions to all CHs which aim to understand their perceptions of FSC ([Global market survey](#)). ASI conducts an annual survey with its standard system owners and CBs to obtain feedback on its service delivery. The results are used for system improvements and presented on the ASI website ([ASI Client Satisfaction Study](#)).

FSC has developed a risk management plan. FSC already uses a large number of risk-mitigating strategies: stakeholder engagement in governance, standard setting, and audits; public summaries of FM audit reports; a robust dispute resolution system; strict rules for CHs wishing to switch CB; no possibility of downgrading non-conformities; normative advice notes or standard interpretations in cases of doubt to ensure consistency among CBs; no 'quick fixes' of findings in CB audits, but rather analysis of root causes and effective corrections for

all the CB's CHs; trademark protection; and introduction of new technologies, such as fibre testing and earth observation.

See Annex 1 for a list of normative documents being used in the FSC assurance system.

3. Personnel competence

Two normative documents, the *FSC Accreditation Standard* (FSC-STD-20-001) and the new procedure *General Requirements for an FSC Training Programme* (FSC-PRO-20-004) specify qualification and training requirements for different categories of CB personnel. All auditors must have a relevant professional educational background and experience, to have successfully completed an IRCA-registered *ISO Management Standard Auditor* or equivalent *ISO 19011* course, an FM or CoC auditor training course following FSC's content requirements, and to have participated as a trainee in at least four audits. The normative requirements also include specifications about auditor trainers and the way initial auditor training is supposed to be implemented. CBs must have a monitoring programme to evaluate their auditors who must be evaluated at least once every three years through a witness audit. Records of performance appraisals have to be available.

The person(s) of the certification decision-making entity of the CB must be qualified as auditors and have a level of knowledge and experience sufficient to assess the audit processes, the audit report, and associated evidence and recommendations made by the audit team.

ASI conducts a number of witness audits of each CB annually. The purpose of these witness audits includes observing the performance of auditors and audit teams. FSC requirements also give specification about the composition of audit teams, including technical experts. ASI is considering moving more toward personnel certification, in accordance with ISO 17024, and has started with the development of an auditor and training registry in cooperation with FSC.

To ensure that CBs are on top of the latest developments, FSC meets annually with CBs to discuss recent changes in the FSC certification system. This is an opportunity for both sides to provide feedback and share best practice in relation to current and controversial issues. Most CBs also regularly organize internal calibration meetings.

4. Audits

FSC CHs undergo the following sequence of evaluations:

1. Pre-evaluation (for FM certificates), to check the applicant CH's management system and perform a gap analysis and a public consultation.
2. Main evaluation, including an audit of the management system, site audits, interviews, and stakeholder consultation (for FM certificates) and the certification decision. When the certification decision is positive, the certificate is issued for a five-year period.
3. Annual surveillance evaluations, including desk audits, site visits, interviews and stakeholder consultation (for FM).
4. Re-evaluation after five years to re-issue the certificate, following the same procedures as the main evaluation.

The *FSC Accreditation Standard* (FSC-STD-20-001) requires that surveillance audits take place at least annually, and may be more frequent depending on risk factors such as: the scale and complexity of the operation; the intensity of resource management; results of risk assessment in the case of group certification; the ecological sensitivity of the resource base; the experience and track record of the CH; the number and nature of any non-conformities identified by the CB; and the number and nature of any complaints submitted by stakeholders.

The audit team must consist of a qualified lead auditor, a team member fluent in the language of the district or state or an interpreter, and (for FM) one team member who is resident in the respective country or in a nearby country with similar forest conditions, or (for CoC) one team member who has knowledge of the critical characteristics of the operational processes under audit. For selecting audit team members, there is a set of criteria that defines the experience auditors must have with respect to FM, social, environmental, and economic issues. CoC audits and small or less complex audits may be conducted by a single lead auditor.

Knowledge sharing by CBs is not allowed within the audit process, but the CB is allowed to explain its findings or clarify the requirements of normative documents. To ensure impartiality, the CB does not give prescriptive advice or consultancy as part of an audit.

After the audit, the lead auditor writes an audit report providing information about the certificate and describing the situation found. It explicitly lists all observations and non-conformities detected during the audit. For FM certificates, the audit report has to be reviewed by at least one independent peer reviewer. The CB assigns an entity that makes the certification decision based on all information related to the audit, including the audit report and the peer reviewer's comments (in case of FM certificates). A certificate will only be issued, maintained, or renewed after the CB has taken the positive formal certification decision, that there are no major non-conformities pending requiring corrective action by the applicant.

The FSC system distinguishes between minor and major non-conformities, defined as follows:

- Minor if: (a) it is a temporary lapse, or (b) it is unusual/non-systematic, or (c) the impacts of the non-conformity are limited in their temporal and spatial scale, and (d) it does not result in a fundamental failure to achieve the objective of the relevant FSC criterion or another applicable certification requirement.
- Major if, either alone or in combination with further non-conformities, it results in, or is likely to result in, a fundamental failure: (a) to achieve the objectives of the relevant FSC criterion, or (b) in a significant part of the applied management system.

Where non-conformities are observed during an audit, the CH is given the opportunity to correct them via a corrective action request. The deadline for this is within one year for minor non-conformities and three months for major non-conformities. If five or more major non-conformities are observed during the audit, this shall be considered as a total breakdown of the CH's system and the certificate will be suspended immediately.

All non-conformities have to be addressed with a corrective action by the CH. If the CB decides that non-conformities, whether minor or major, have not been appropriately corrected within the given time, minor non-conformities will be upgraded to majors, and major non-conformities will lead to immediate suspension of the certificate. Non-conformities are published in the public summary reports of FM certificates on the FSC certificate database (<http://info.fsc.org/>).

FSC has specific requirements for group entities wishing to obtain a group certification. It distinguishes between group requirements and member requirements, has rules for the internal management system and requirements for internal monitoring by the group manager and auditing by the CB, including a sampling method. A distinction is also made between group failure and member failure.

For small or low-intensity managed forests (SLIMF) less strict requirements exist.

5. Accreditation

[Assurance Services International](#) (ASI) is the only accreditation body for FSC, and offers international, third party accreditation (oversight) at a global scale. ASI is a full member of the ISEAL Alliance and maintains a quality management system in accordance with ISO/IEC 17011. FSC does not allow for proxy accreditation, and the ASI accreditation procedure specifies that ASI will not rely on the results of accreditations issued by other accreditation bodies.

ASI's accreditation procedure provides the requirements for CBs to become and stay accredited. ASI checks if applicant CBs have the structures and capacities in place to offer certification services, and ASI may conduct a preliminary visit to the CB's office. During the initial accreditation assessment, the ASI assessment team will review the CB's conformity with the FSC accreditation requirements relevant to the scope of accreditation (i.e. FM, CoC), ASI's accreditation requirements, and the CB's own procedures. The assessment includes an assessment of the head office and of a selection of sites, such as affiliate offices or subcontractors, and at least one witness assessment per accreditation scope. ASI writes an accreditation report. If major non-conformities have been identified, they have to be closed before the CB can be accredited. The CB will receive a certificate of accreditation with a validity of five years, after which re-accreditation has to be undertaken. After ASI has accredited a CB, it carries out annual surveillance assessments. ASI schedules its assessments based on risk analyses, and applies four different kinds of assessment activities: document review/desk studies, (affiliate-) office assessments, witness assessments, and conformity assessments.

ASI applies a system that goes beyond pure accreditation. This includes for example the field assessments (witness and compliance assessments), transaction verification where sales documents are matched throughout the supply chain in order to detect fraud, and the incidents system, where stakeholders' observations are registered and monitored, and may finally be considered during the ASI assessments.

If so requested by FSC, ASI carries out in-depth studies of its assessment findings or on specific issues across all or a number of CBs to determine the level of competence and consistency of assurance across the standards system, and to identify weaknesses in the normative framework. These studies may be triggered by complaints or criticisms from stakeholders concerning certain aspects of the certification system. ASI can also be requested to provide input to the revision process of a normative document.

6. On-going scrutiny

FSC has a standard FSC-STD-50-001 that regulates the use of the FSC trademarks on FSC-certified products, the use of trademarks for promotion of FSC-certified products, and the promotion of a company's status as an FSC CH. Certificate holders need to have an approved trademark use management system in place or submit all intended uses of FSC trademarks to their CB for approval. FSC national offices also carry out market checks for fraudulent products. The FSC legal department responds to tip-offs and complaints about fraudulent products and services. FSC notifies and collaborates with regulatory boards and government agencies where appropriate to resolve cases of fraud.

FSC encourages everyone to report cases of possible fraud and trademark violations via the [FSC website](#). FSC has a brand protection strategy that focuses on prevention of trademark misuse. The *FSC Trademark Protection Handbook* describes the steps that FSC takes in case of fraud and trademark infringement with the goal of resolving fraud through targeted legal action. CBs are responsible for ensuring that mislabelled products do not enter the market. If this still happens, the FSC Trademark Unit will follow up and determine what steps need to maintain or re-establish the integrity of the FSC system.

Annex 1. List of main normative documents applied in accreditation and certification

The FSC and ASI normative documents can be downloaded from the FSC and ASI websites respectively. The documents listed below are all written in English; most of the FSC documents are also available in Spanish on the Spanish version of the FSC website.

- *Principles and Criteria for Forest Stewardship* (FSC-STD-01-001)
- *SLIMF Eligibility Criteria* (FSC-STD-01-003 V1-0)
- *General Requirements for FSC Accredited Certification Bodies* (FSC-STD-20-001)
- *Stakeholder Consultation for Forest Evaluations* (FSC-STD-20-006)
- *Forest Management Evaluations* (FSC-STD-20-007)
- *Evaluations Addendum – Forest Certification Reports* (FSC-STD-20-007a FM)
- *Evaluations Addendum – Forest Certification Public Summary Reports* (FSC-STD-20-007b FM)
- *Chain of Custody Evaluations* (FSC-STD-20-011)
- *Standard for Group entities in Forest Management Groups* (FSC-STD-30-005)
- *Standard for Chain of Custody Certification of Multiple-sites* (FSC-STD-40-003)
- *Standard for Chain of Custody Certification* (FSC-STD-40-004)
- *Requirements for Use of the FSC Trademarks by Certificate Holders* (FSC-STD-50-001)
- *Non-Certificate Holder Promotional Trademark Use* (FSC-STD-50-002)
- *Policy for the Association of Organizations with FSC* (FSC-POL-01-004)
- *The Development and Revision of Normative Documents* (FSC-PRO-01-001)
- *Processing Appeals* (FSC-PRO-01-005)
- *Processing Complaints in FSC Certification Scheme* (FSC-PRO-01-008)
- *Participation of External Observers in On-site FSC Certification Audits and/or ASI Assessments* (FSC-PRO-01-017)
- *Transfer of FSC Certificates and License Agreements* (FSC-PRO-20-003)
- *General Requirements for an FSC Training Programme* (FSC-PRO-20-004)
- *Pesticide Derogation Procedure* (FSC-PRO-30-001)

- *Quality Manual* (ASI-POL-10-100)
- *Accreditation Procedure* (ASI-PRO-20-101)
- *Appeals Procedure* (ASI-PRO-20-103)
- *Complaints Procedure* (ASI-PRO-20-104)
- *Procedure on Surveillance and Sampling* (ASI-PRO-20-105)
- *Assessment Findings* (ASI-PRO-20-105)
- *Witness and Compliance Assessments* (ASI-PRO-20-111)
- *Assessment Schedule* (ASI-INF-20-108)