



Forest Stewardship Council®



Consultation report on the  
*General requirements for FSC accredited  
certification bodies*  
FSC-STD-20-001 V4-0 Draft 2-0 EN

Bonn, September 2015.

## **Synopsis of consultation comments on the second revised draft General requirements for FSC accredited certification bodies**

Consultation period

English/Spanish: 27 May – 31 July 2015

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This document has been prepared in accordance with Clause 5.12 of FSC-PRO-01-001 (V 3-0)<sup>1</sup>, and contains an analysis of the range of stakeholder groups who submitted comments, as well as a summary of the issues raised (in relation to the requirements), a general response to the comments and an indication as to how the issues raised were addressed.

Responses to individual stakeholder comments are provided in the [compiled comments document](#).

Contents:

1. Range of stakeholder consultation participants
  2. General comments
  3. Comment summary
- Annex 1: Public Consultation Participants

Note:

Text in black: Stakeholder feedback summary

*Text in italics* and "Result": PSU comment

Abbreviations used:

CB – Certification Body

CH – Certificate Holder

FM – Forest Management

PSU – Policy and Standards Unit

WG – Working Group

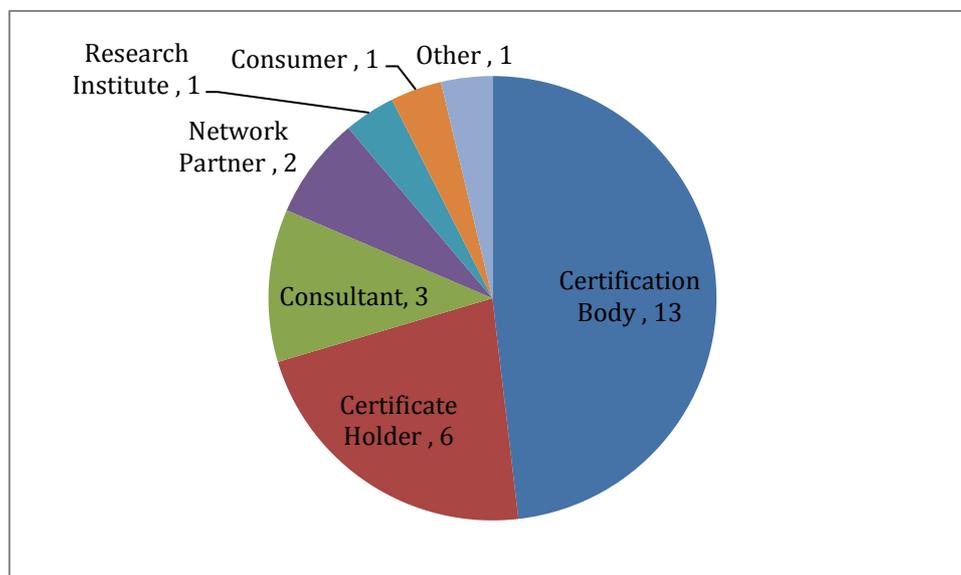
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<sup>1</sup> FSC-PRO-01-001 V 3-0 The Development and Revision of FSC Normative Documents.

## 1. Range of stakeholder consultation participants

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Overall 27 stakeholders provided feedback on the consulted second revised draft (for details see Annex 1). The responses were divided among the following groups of stakeholders:



19 of the 27 consultation participants are FSC members, representing both the economic north and economic south sub-chamber. Social and environmental FSC members did not actively participate in the second public consultation.

## 2. General comments

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Only very few general comments were provided, concerning the language and length of the revised standard, asking mainly for streamlining of the document and consistency checks of terminology. One Network Partner requested another round of consultation.

*The standard was re-checked and amended to ensure consistent use of terminology and clarity of requirements, taking stakeholder feedback into account.*

*The Steering Committee decided that no further round of public consultation is necessary. Outstanding concerns raised by stakeholders are documented and presented to the FSC Board for consideration.*

## 3. Comment summary

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Below is a summary of the key topics stakeholders provided feedback on, together with a PSU response on how the comments were addressed.

### **Implementation of GA Motion 66 on Auditor Rotation**

The Motion on auditor rotation for forest management audits foresees that exemptions are possible “for regions with very few certified operations”. A proposal for defining exemptions was consulted with stakeholders, which included specific thresholds for number of certificates at country level. Two certification bodies have requested that the exemptions are defined considering the number of certificates of each certification body at country level.

- *An analysis of number of FM certificates per certification body and country was done which shows that there are frequent cases of certification bodies only having a small number of certificates in a country, although the overall number of certificates in the country is high. Those certification bodies would be considerably disadvantaged from the auditor rotation requirement. Generally speaking this would have a negative impact on certification bodies starting to operate in new countries.*
- *The proposal was amended, defining thresholds for number of certificate holders per certification body and country.*

### **Clarification of meaning of consultancy**

3 consultants and one certificate holder have raised concerns in the second round of consultation that certification bodies are allowed to provide training and templates/ example procedures to clients under certain circumstances.

- *The revised standard continues to disallow certification bodies to provide consultancy services to clients, but provides clarification and interpretation what consultancy actually means. The interpretation is based on existing standard wording, which has been taken from ISO.*
- *The requirements reflect current common practise of (some) certification bodies, but provide safeguards which the current valid standard version does not have and are therefore important for reasons of transparency and consistency.*

### **Classification of certification body's subsidiaries as bodies providing outsourced services**

Two certification bodies continue to strongly object that the revised standard does not differentiate between external bodies providing outsourced services and certification body's subsidiaries/ affiliates.

- *The Working Group concluded that in principle any type of subcontractor needs to conform to the same type of requirements, since the scope of FSC accreditation only covers the accredited entity.*
- *Conformity with FSC requirements will be easier for subsidiaries in practice, therefore it should be acceptable to all to implement the standard as proposed.*

### **Timelines to correct minor nonconformities**

The proposed standard proposes to keep the established approach that minor nonconformities need to be corrected within 12 months, which is not aligned with the timeline of up to 15 months for conducting surveillance audits. At the annual certification body meeting several certification bodies expressed concerns with this approach, which was highlighted again by one certification body during the consultation.

- *It is acknowledged that the current approach requires careful planning of audits to ensure that the 12 months timeline can be met where on-site verification is required and does not provide the desired flexibility*
- *It must be noted that the current approach responds to other stakeholder concerns about the length of the timeline to close minor nonconformities and the credibility of the FSC system;*

- *PSU suggested to therefore keep the timeline to correct minor nonconformities unchanged.*

### **Implementation of Motion 52: amended and new requirements for qualification and training of auditors**

In response to the demands of Motion 52 and as a result of the work of an Expert Advisory Group (EAG) – initiated by FSC in May 2014 with representatives of Certification Bodies, Network Partners and training experts – the requirements for auditors as concerns their training and qualification and other CB personnel (technical experts, certification decision making entity) were amended.

- *All amendments were submitted to the Working Group for review, revision, and approval in accordance with FSC PRO-01-001.*
- *The work primarily resulted in more specifications of clause 3.1 (CB personnel) and a new annex (qualification and training for auditors) of the revised STD 20-001.*
- *Requirements for a FSC Training Program are planned to be included in a new separate procedure document (FSC PRO-20-004). A round of technical consultation is planned with CBs before submitting the final FSC-PRO-20-004 to the FSC Board of Directors.*
- *All amendments were consulted with stakeholders as part of the revision process of FSC STD 20-001 and according to FSC PRO-01-001.*
- *Some changes have been made, responding to stakeholder concerns and after careful review.*
- *It is acknowledged that the new requirements for qualification and training are higher and demanding – while they have been comprehensively discussed and carefully revised.*

## Annex 1 Public Consultation Participants

Organization	Name	Stakeholder Type	FSC member
BM Trada	Rafal Andruszkiewicz	Certification Body	Econ-n
Consultant	Gunther Hentschel	Consultant / Auditor	
	Tomas Olsson	Consumer	
Copener Florestal	Meryellen Baldim	Certificate Holder	Econ-s
CMPC Celulose Riograndense	Maurem Kayna Lima Alves	Certificate Holder	Econ-s
CMPC	Augusto Robert	Certificate Holder	Econ-s
CSI	Marco Clementi	Certification Body	Econ-n
DNV GL	Elisabet Bröms Sterner	Certification Body	Econ-n
DuraCert	Bert de Jong	Certificate Holder	
DRVO MEHANIKA	Dragan Savić	Consultant	
FSC Germany	Elmar Seizinger	Network Partner	
FSC Sweden	Eva Mattsson / Lina Bergström	Network Partner	
Individual	Nina Griesshammer		
GFA	Matthias Rau	Certification Body	Econ-n
Holz.ConZert	Alain Paul	Consultant	Econ-n
Holzforschung Austria	Dimitrij Pospelov	Certification Body	
Inspecta Sertifiointi Oy	Timo Soininen	Certification Body	Econ-n
International Paper	Ross Congo	Certificate Holder	Econ-n
IPEF - Instituto de Pesquisas e Estudos Florestais	Kaliana Moro Tanganelli	Research Institute	Econ-s
NEPCon	Tigran Martirosyan	Certification Body	Econ-n
Rainforest Alliance	Tammy Coe	Certification Body	Econ-n
SCS Global Services	Vanessa Ellis	Certification Body	Econ-n
SGS	Gerrit Marais / Christian Kobel	Certification Body	Econ-s
Sguario Florestal S/A	Priscila Ap Medeiros Soares	Certificate Holder	Econ-s
Soil Association Woodmark	Meriel Robson	Certification Body	Econ-n
Tüv Croatia (Tüv Nord)	Renata Petrić	Certification Body	Econ-n
Tüv Nord Cert	Carsten Kahlert	Certification Body	Econ-n