



PSU REVIEW REPORT

Joint review report of FSC-STD-20-001 V4-0, FSC-PRO-20-003 V1-0 and FSC-PRO-20-004 V1-2

26/09/2022



Title: PSU Review Report

Dates: **Approval date:** 4 July 2022

Contact for comments: FSC International – Performance and Standards Unit
Adenauerallee 134
53113 Bonn
Germany

Phone: +49 -(0)228 -36766 -0

Fax: +49 -(0)228 -36766 -65

Email: psu@fsc.org

© 2022 Forest Stewardship Council, A.C. All Rights Reserved
FSC® F000100

You may not distribute, modify, transmit, reuse, reproduce, re-post or use the copyrighted materials from this document for public or commercial purposes, without the express written consent of the publisher. You are hereby authorized to view, download, print and distribute individual pages from this document subject for informational purposes only.

SUMMARY AND RECOMMENDATIONS

Document code: 1. FSC-STD-20-001 V4-0
2. FSC-PRO-20-003 V1-0
3. FSC-PRO-20-004 V1-2

Document title: 1. General requirements for FSC accredited certification bodies
2. Transfer of FSC Certificates and License Agreements
3. General Requirements for FSC Training Programme

Objective of document:

1. **FSC-STD-20-001:** ensure that FSC accredited certification programs are managed in a competent, consistent, impartial, transparent, rigorous, reliable and credible manner. The standard was developed to ensure the conformity with ISEAL requirements and compatibility with DIN EN ISO/IEC 17065:2013-01¹
2. **FSC-PRO-20-003:** applying a consistent set of process requirements to facilitate the voluntary transfer of certificate holders from one certification body to another
3. **FSC-PRO-20-004:** ensure consistent initial and ongoing qualification of auditors through implementation of the FSC Training Programme

Last approval date: 1. 09 November 2015
2. 13 December 2010
3. 10 March 2016

Review triggered by:

- Regular review as scheduled
- GA Motion or Board decision
- New or changed FSC policies or legislation
- Change Requests
- Other (please specify):

Reviewer: **Name:** Farhan Ahmad Butt
Dorothee Jung-Wilhelm

Email: systemdevelopment@fsc.org

Draft Review Report: 04 July 2022

Public consultation: 11 July 2022 – 14 August 2022

¹ DIN EN ISO/IEC 17065:2013-01 Conformity assessment - Requirements for bodies certifying products, processes and services

Recommendation

<input checked="" type="checkbox"/> Full revision
<input type="checkbox"/> Minor revision ²
<input type="checkbox"/> Editorial revision
<input type="checkbox"/> No revision
<input type="checkbox"/> Withdrawal

NOTE

If the need for revision is concluded and supported by stakeholders, the report will be presented to the FSC Board of Directors for decision making. If approved by the FSC Board, the reviewed documents will then undergo a revision process as described in procedure FSC-PRO-01-001 V3-1.

² According to FSC-PRO-01-001 V3-1 Annex 4

This report has been developed according to FSC-PRO-01-001 V3-1 Clause 9.6 to review (assess) the continued relevance and effectiveness of a normative document. This is a mandatory step before a normative document can be taken to a revision process. In addition, it responds to the Board requirement for a feasibility and impact for all review and revision processes, mandated at their 71st Meeting.

CONTENTS

Summary and recommendations	3
1. Proposed recommendation and justification	6
FSC-STD-20-001 V4-0: General requirements for FSC accredited certification bodies	7
FSC-PRO-20-003 V1-0: Transfer of FSC Certificates and License Agreements	8
FSC-PRO-20-004 V1-2: General Requirements for an FSC Training Programme	9
2. Impact analysis	10
Internal	10
External	10
3. Stakeholder consultation and feedback	11
Methodology	11
Results	11

1. Proposed recommendation and justification

Full revision is recommended PSU recommends a full revision of FSC-STD-20-001 V4-0 *General requirements for FSC accredited certification bodies*. The standard (FSC-STD-20-001) is the main normative document to regulate the implementation of the FSC accredited certification programs by certification bodies. The last full revision was completed in 2015 to ensure conformity with ISEAL requirements and compatibility with DIN EN ISO/IEC standard 17065:2013-01³(ISO 17065).

The current standard presents some of the ISO 17065 requirements in the wording of the standard, but also two other ISO standards DIN EN ISO/IEC 17021:2011-07⁴ (ISO 17021) and DIN EN ISO/IEC 17024:2012-11⁵ (ISO 17024) were used as reference. In addition to ISO references, the current standard also contains the set of FSC-specific requirements. The revised standard shall remove references to other ISO standards and should not duplicate ISO 17065 requirements but simply contain additional FSC specific requirements.

Compliance with EC regulation 765/2008 and conformity with ISO 17065 is required The European Parliament has mandated the member states to establish a single national accreditation body per country in EU. The national accreditation body is responsible for the accreditation of certification bodies in their respective territory. For example, Deutsche Akkreditierungsstelle (DAkKS), ACCREDIA, and UKAS are national accreditation bodies for Germany, Italy and United Kingdom respectively. FSC is a scheme that offers product certification and thus FSC's accreditation requirements need to be in full conformity with ISO 17065.

In compliance with EC regulation 765/2008, FSC's accreditation and assurance body Assurance Services International (ASI) has introduced a **Two-Tier Assurance Program (TTAP)**. **Tier One** consists of accreditation of certification body by the national accreditation body (where necessary) in agreement with ASI as per ISO 17065. **Tier Two** includes complementary and mandatory ASI assurance services such as FSC-specific assurance assessments. ASI is implementing TTAP in collaboration with DAkKS for certification bodies with head offices in Germany and intends to expand the TTAP for all certifications bodies worldwide. Certification bodies in non-European Economic Area and non-UK will be subject to accreditation from ASI North America.

Consequently, ASI assurance services (Tier Two) are required to be aligned with the standard especially in context of the geographical scope of certification bodies.

³ DIN EN ISO/IEC 17065:2013-01 Conformity assessment - Requirements for bodies certifying products, processes and services

⁴ ISO/IEC 17021 Conformity assessment - Requirements for bodies providing audit and certification of management systems

⁵ ISO/IEC 17024 Conformity assessment – Requirements for bodies operating certification of persons

In addition, other EU regulations being developed e.g. on ecolabelling will be requiring FSC to comply.

Conformity with ISEAL requirements The current version of FSC-STD-20-001 aims to ensure conformity with ISEAL Code of Good Practices for Assuring Compliance with Social and Environmental Standards V1-0. The revision will incorporate changes of the V2-0 of this ISEAL code, published in January 2018.

Relevant prioritized actions to address the Motion 61 (2017) are recommended to be explored and implemented Motion 61, approved at the General Assembly 2017, asked FSC to analyse integrity threats that exist in the FSC assurance system and propose solutions to these threats. To address the motion, a report was produced by PSU which included prioritized actions. This revision will explore the implementation of relevant prioritized actions to address the recommendations of the Motion 61 report such as:

- Strengthen risk-based approaches to certification and accreditation
- Review timelines for non-conformities (NCs) received by CHs
- Improve the approach to and content of the auditor registry

Topics other than the 15 prioritized actions from the M61 report such as unannounced audits, public peer review (of FM audit reports) and strengthening social auditing skills will also be explored for their implementation.

Joint revision is recommended The FSC-PRO-20-003 V1-0 *FSC Certificates and License Agreements* can be seen as an addendum to FSC-STD-20-001, specifically regulating how certificate holders can move from one certification body (CB) to another. The revision of FSC-PRO-20-003 needs to align FSC's transfer requirements with relevant ISO requirements.

Similarly, FSC-STD-20-001 relates to the requirements of the FSC Training Programme (FSC-PRO-20-004 V1-2), as FSC-STD-20-001 includes requirements for auditor qualification on which the procedure builds.

It will be the first full revision of both procedures. Due to interlinkages, a joint revision is planned, including the consideration of how the documents can be streamlined and possibly included the procedures as addenda to FSC-STD-20-001.

Several additional issues related to all three documents have been collected since the publication of the current versions from various stakeholders including but not limited to certification bodies, enquires, interpretations and derogations, input of other FSC units including system integrity and input of ASI. The topics presented in this and the following section will be considered in the joint revision process.

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

Implementation issues

- Requirements to conform with the new digital Trademark License Agreement (TLA) are not fully specified.
- Review and if necessary, revise registration of certifications.
- Inconsistent certificate codes presented in the standard.

- Standard requirements for certificate codes require alignment with FSC certification database
- Need to review and revise the requirements for addressing extraordinary situations (such as pandemics and war), considering the temporary derogations FSC issued in the past years.
- Alignment of terms and definitions with ISO.

Gaps

- Review accreditation scopes of certification bodies and considering including further specifications, e.g. concerning the geographical scope.
- Review impartiality requirements to consider whether further specifications are necessary, e.g., concerning the composition and terms of the committee for safeguarding impartiality.
- Clarify the requirements on social auditing skills of auditors.
- Specify timeframe to register new certificates on FSC certification database (info.fsc.org).

Integrity issues

- Explore developing new tools such as an integrity risk assessment in the certification application and certificate transfer process, to identify and mitigate integrity risks.
- Develop and test new tools to enhance system integrity such as a platform solution to maintain the certification history of an applicant and reasons of termination/transfer.

Clarity

- Clarity on requirements regarding the obligations of CHs to allow CBs, ASI and FSC to conduct an additional assessment to maintain oversight when necessary such as during fraud and false claim investigations.

FSC-PRO-20-003 V1-0: Transfer of FSC Certificates and License Agreements

Requirements of this procedure will need to be revised to be aligned with ISO requirements on transfer of certificates. Therefore, the list issues below will only be tackled if not in contradiction to relevant ISO requirements:

Implementation issues

- Consider allowing, conducting the transfer audit before the agreed transfer date.
- Revising and aligning FSC-STD-20-001 and the transfer procedure on access to information on Corrective Action Requests issued by the preceding CB.
- Review mechanism for agreeing on a transfer date.

Gaps

- Clarify retention of CH records including license codes in case of certification termination and re-certification evaluations.
- Explore the validity of certificate termination after the request to transfer the certificate under subject is made.

Clarity issues

- Scope of application of the transfer process and clarity of terminology (voluntary transfer, transfer due to termination of CB accreditation).
- Clarify the rules regarding the (voluntary) transfer of certificate at re-evaluation including signing of TLA.
- Roles and responsibilities of preceding and succeeding CB in case of ASI findings regarding the conformity of a certificate holder.

FSC-PRO-20-004 V1-2: General Requirements for an FSC Training Programme

Implementation

- Analyse the effectiveness of the current procedure and consider amendments to improve consistency of trainings.
- Review and clarify requirements about remote vs. in-person trainings.

Gaps

- Consider minimum chain of custody auditor qualifications for forest management auditors.

2. Impact analysis

Internal

- Proposed changes in the joint revision would directly affect the FM, CoC and CW evaluation standards FSC-STD-20-007, FSC-STD-20-011 and FSC-STD-20-012 respectively. As the revision of FSC-STD-20-007 and FSC-STD-20-012 is currently ongoing and expected to be finalized by end of 2022 and mid of 2023 respectively. The revision of FSC-STD-20-011 will be ongoing in parallel and it will be important to anticipate alignment needs.
- The revision is expected to strengthen the system integrity, ensure effectiveness and relevance of accreditation related requirements and thereby stabilize and strengthen the normative framework.

External

Certification bodies, ASI and certificate holders

- Alignment of accreditation requirements with the ASI Two-Tier Assurance Program and European accreditation regulations EC regulations 765/2008 will provide certification bodies operating in EU a clear and legitimate status to conduct FSC FM and CoC evaluations and provide related services.
- The necessary changes with demanding ISO 17065 accreditation as a basis for FSC accreditation will also have an impact on the certification bodies operating outside of the EU, requiring efforts to adjust the accreditation system to the changed requirements. To ensure a non-discriminatory accreditation system, FSC needs to apply the same requirements to all certification bodies.
- Increased demand for certification bodies to conform with changing statutory requirements and to ensure transparency might impact their business model and retention of their FSC accreditation.
- Alignment of the accreditation standard and related procedures with the FSC certification database will help in providing CBs and CHs clarity on understanding and implementing normative requirements. It might also require additional effort in adjusting to the new data definition and technology.

FSC membership

- Implementation of relevant topics from Motion 61 will help mitigate assurance risks, increase transparency and overall performance of CBs. Therefore, positive effects on credibility and trust of the membership is expected.

3. Stakeholder consultation and feedback

Methodology

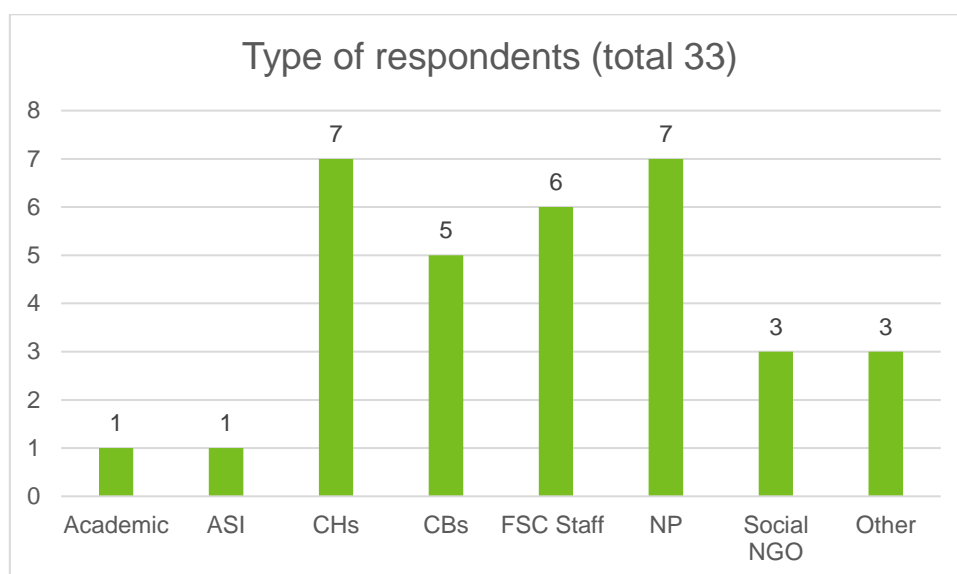
Stakeholders were invited to provide comments and feedback on the draft review report from 11 July 2022 until 14 August 2022 via the FSC consultation platform.

Results

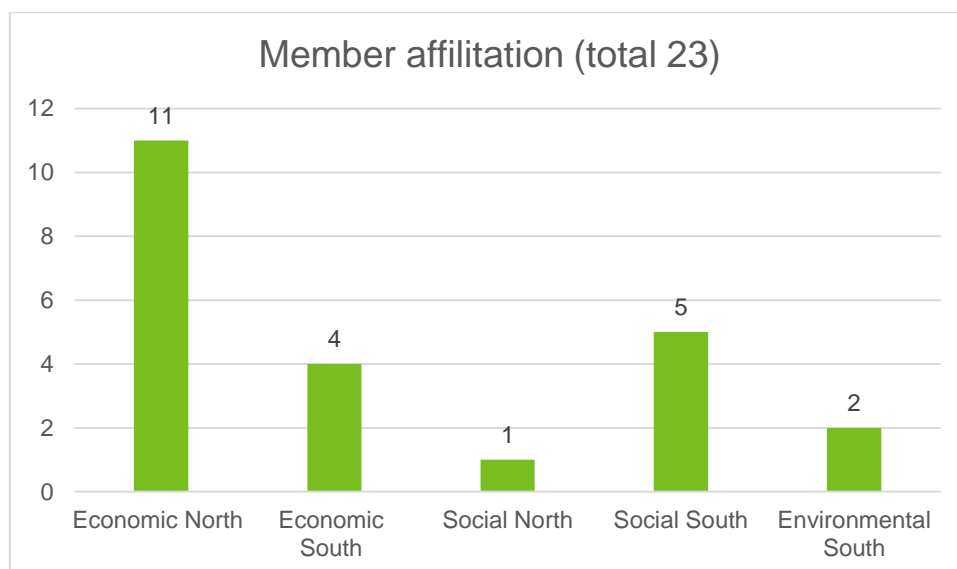
In total, 43 participated in the consultation process and FSC received 33 responses on the proposal to start the revision. Out of 33 respondents, 28 are in favour of joint revision, 1 disagreed and 4 neither agreed nor disagreed with the revision proposal.

1 participant that disagreed with the revision, agreed on the need for joint revision but suggested a later timing to start the revision process.

Charts below present the type of stakeholder that participated in the consultation process including their affiliation with FSC as members.



Out of 33 participants, 23 were FSC members including 11 members belonging to CHs and CBs.



Stakeholders feedback

Stakeholders confirmed the issues and the topics already referenced in the review report. Following are the key topics and issues highlighted by stakeholders during the consultation process:

Stakeholders supported the idea of merging three documents into one. A few suggested that to only focus on the necessary alignment with ISEAL Assurance Code V2 and ISO 17065 so that the impact on CHs can be minimised. Stakeholders highlighted the need for simplification and consistency in the document but at the same time taking a deeper look at the Auditor Training program, auditor monitoring and CBs performance evaluation. In addition, clarity in implementation of ASI Two Tier Assurance Program and strengthening system integrity by additional measures is suggested.

Stakeholders feedback was shared with the Policy and Standards Committee (PSC) and FSC Board of Directors (BoD). At its 93rd meeting in August 2022, the FSC Board approved the joint revision of three normative documents. Following the Board approval, FSC considered the stakeholders feedback in the preparation of Terms of Reference for the revision process however some of the concerns raised by the stakeholders go beyond the scope of this revision process e.g. CB performance can be considered in requirements FSC is setting for ASI, but not as part of the process.



FSC International – Performance and Standards Unit

Adenauerallee 134

53113 Bonn

Germany

Phone: +49 -(0)228 -36766 -0

Fax: +49 -(0)228 -36766 -65

Email: psu@fsc.org