



Forest Stewardship Council®






Review Report

of

FSC-PRO-01-008 V2-0

Processing Complaints in the FSC Certification Scheme



Status:	Final
Date finalized:	14 February 2020
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Review Report

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

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

Summary and recommendation

Reviewed Document

Document code	FSC-PRO-01-008 V2-0
Document title	<i>Processing Complaints in the FSC Certification Scheme</i>
Objective of document	<p>The FSC Dispute Resolution System provides a framework for the resolution of disputes that stakeholders may have with the FSC Board of Directors, the FSC and/or its affiliates, the ASI, FSC accredited Certification Bodies or FSC Certificate Holders.</p> <p>The framework consists of three procedures which detail the process according to the nature of the dispute and the respective roles of the different parties involved in the process. This procedure deals with complaints regarding the FSC normative framework or the performance of FSC International, the FSC Network as well as complaints regarding the performance of ASI.</p>
Last approval date	28 May 2014
Review triggered by	<input checked="" type="checkbox"/> Regular review as scheduled
	<input type="checkbox"/> GA Motion or Board decision
	<input type="checkbox"/> New or changed FSC policies or legislation
	<input type="checkbox"/> Change Requests
	<input checked="" type="checkbox"/> Other (please specify): Overall review of the FSC dispute resolution system
Reviewer	Name: Alexander Green
	e-mail: a.green@fsc.org
Draft Review Report	
Public consultation	
Final Review Report	

Recommendation

<input checked="" type="checkbox"/>	Full revision
<input type="checkbox"/>	Minor revision ¹
<input type="checkbox"/>	Editorial revision
<input type="checkbox"/>	No revision
<input type="checkbox"/>	Withdrawal

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

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Note

If the need for revision is concluded in 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 document will then undergo a revision process as described in procedure FSC-PRO-01-001 V3-1.

I. Introduction

This report has been developed according to FSC-PRO-01-001 V3-1 Clause 9.6 to 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.

II. Proposed recommendation and justification

The FSC Secretariat recommends a full revision of the procedure for processing complaints in the FSC certification scheme. The revision is proposed for March - October 2020 as part of an overall review of the FSC Dispute Resolution System.





The recommendation from the FSC Secretariat is supported by 86% (37 out of 43) of participants in the public consultation of this review report.

FSC proposes a full revision (1) to align its Dispute Resolution System with international best practice on grievance mechanisms and alternative dispute resolution, (2) to assess the roles, responsibilities and decision-making structures of dispute handling in terms of efficiency, conflict of interest and cost effectiveness and (3) to combine and simplify dispute resolution system documents in order to streamline the FSC Normative Framework and improve user experience.

The following topics have been identified for assessment in the revision process:

- The effectiveness of the FSC Dispute Resolution System as a grievance mechanism for workers and stakeholders affected by forest management activities, including accessibility, clearly defined outcomes and opportunities for escalation
- The roles of different actors in the Dispute Resolution System, including whether dispute handling bodies have the mandate and independence to respond to the scope of disputes (e.g. FSC staff responding to complaints about FSC standards)
- The model of dispute escalation through different handling bodies and the duration and potential outcomes of dispute resolution processes
- The limited opportunity for alternative dispute resolution in the current system
- The number, complexity and formality of Dispute Resolution System normative documents

The proposal is based on the following objectives set out in the [FSC Global Strategic Plan, 2015 - 2020](#):

	To create user-friendly FSC procedures written in plain language (Critical result area 1.1)
	To streamline the FSC Normative Framework (Critical result area 1.1)
	To orient the FSC Normative Framework towards outcome and impact (Critical result area 1.1)
	To increase quality and consistency of disputes processing (Critical result area 1.2)

Participants in the public consultation frequently mentioned similar issues when explaining their support for a revision, with requests to:

- Create clearer rules for complaints processes, including better defined roles and responsibilities for the organizations that handle complaints (mentioned by 7 participants)
- Reduce the number of steps, documents and organizations involved in complaints processes (mentioned by 6 participants)
- Improve transparency of complaints processes (mentioned by 4 participants)

The consultation results align closely with the FSC Secretariat recommendation to revise the procedure for processing complaints in the FSC certification scheme. Improving transparency will be added as a topic for review.

III. Impact analysis

Internal

The proposed revision aims to orient complaints handling towards outcome and impact, reducing staff time spent on procedural aspects of complaint processing and introducing flexibility and efficiency to the management of issues in the FSC certification scheme.

Some activities currently undertaken by FSC staff may be externalized, reducing the role of FSC staff in complaints processing.

Processing Complaints in the FSC Certification Scheme is one of the framework documents for the FSC Dispute Resolution System, describing dispute processes set out in 8 additional documents in the Normative Framework:

- FSC-STD-40-004 V3-0 *Chain of Custody Certification* (Section 1.5)
- FSC-STD-40-005 V3-1 *Requirements for Sourcing FSC Controlled Wood* (Section 7)
- FSC-STD-30-001 V2-0 *FSC Controlled Wood Standard for Forest Management Enterprises* (Section 4)
- FSC-STD-20-001 V4-0 *General Requirements for FSC Accredited Certification Bodies* (Section 1.9)
- FSC-PRO-60-002 V3-0 *The Development and Approval of FSC National Risk Assessments* (Section 12)
- FSC-STD-06-006 V1-2 *Process Requirements for the Development and Maintenance of National Forest Stewardship Standards* (Section 13)
- FSC-PRO-01-001 V3-1 *Development and Revision of FSC Normative Documents* (Section 19)

To implement any changes proposed to the overall FSC Dispute Resolution System, the sections in these documents related to dispute processes may have to be updated.

The grievance mechanisms and remediation activities required by forest management certificate holders are set out in the FSC Principles and Criteria for Forest Management. Changes to the Principles and Criteria are only possible through membership approval at the FSC General Assembly and are therefore not part of this proposed revision.

Staff time for maintaining Dispute Resolution System normative documents may reduce if some of the documents are combined.

[94% of complaints received by FSC International through this procedure should have been submitted to other complaint handling organizations in the FSC Dispute Resolution System. This increased the time required to process complaints. Clearer rules for complainants and better-defined roles and responsibilities for complaint handling organizations should increase the instance of correctly submitted complaints, reducing the complaint processing time.](#)

External

The proposed revision aims to simplify and improve the experience of users of the FSC Dispute Resolution System through increased effectiveness, use of versatile resolution

mechanisms and focus on outcomes. [Clearer rules for complainants should reduce the time required to process complaints.](#)

Certificate holders and certification bodies may be required to update their internal procedures for handling disputes. Proposed changes may also have to be reflected in ASI-PRO-20-104 V5-2 *Complaints*, an operating procedure of Assurance Services International.

IV. Stakeholder consultation and feedback

Methodology

Stakeholders were invited to provide comments and feedback on the draft review report from 10 December 2019 until 31 January 2020 via the FSC consultation platform.

Results

43 people participated in the public consultation.

37 participants (86%) **agree** with the proposal to revise the document. 1 participant (2%) disagrees and 5 (12%) neither agree nor disagree.

The most common reasons for supporting a revision are to:

	Mentions
Create clearer rules for complaints processes, including better defined roles and responsibilities for the organizations that handle complaints	7
Reduce the number of steps, documents and organizations involved in complaints processes	6
Improve transparency of complaints processes	4
Create feasible resource requirements of complaints processes for the organizations that handle complaints	3
Improve responsiveness of the organizations that handle complaints	3

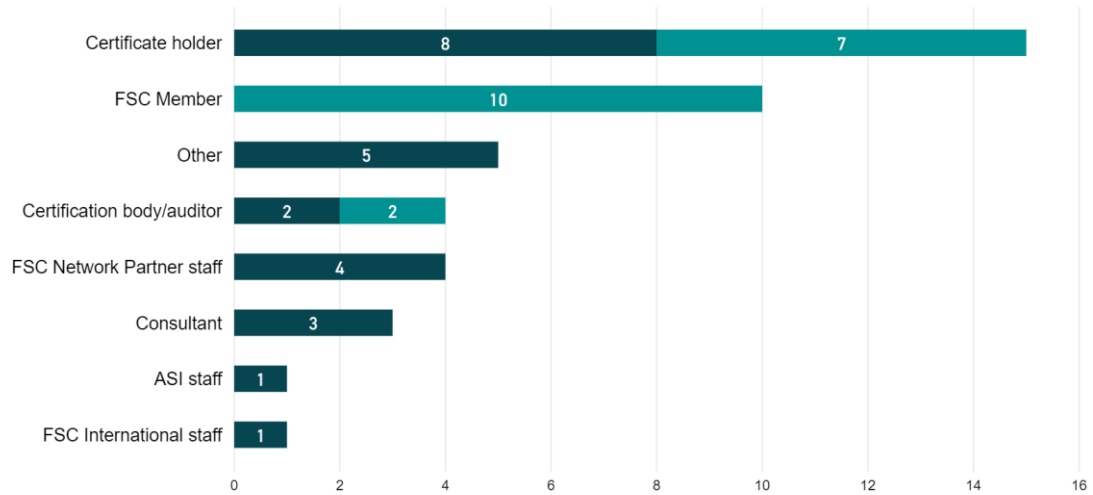
[The one response that disagrees with the proposal states that FSC should prioritize other, unspecified topics.](#)

The largest participant group by self-description is FSC certificate holders (15 respondents, 35%), although 19 of the participants (44%) are also FSC members.

Participants come from 8 out the 9 stakeholder groups tracked by FSC (no FSC trademark service license holders participated).

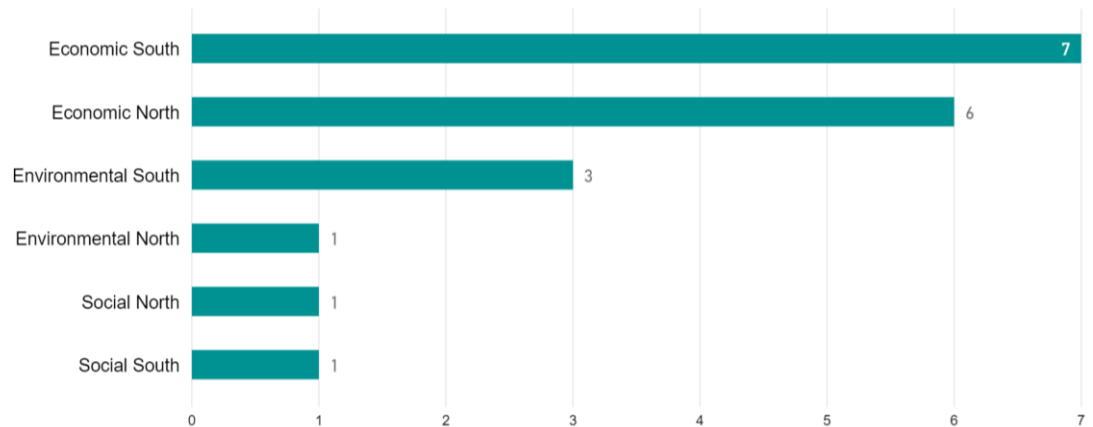
Which of the following best describes you?

Member? ● No ● Yes



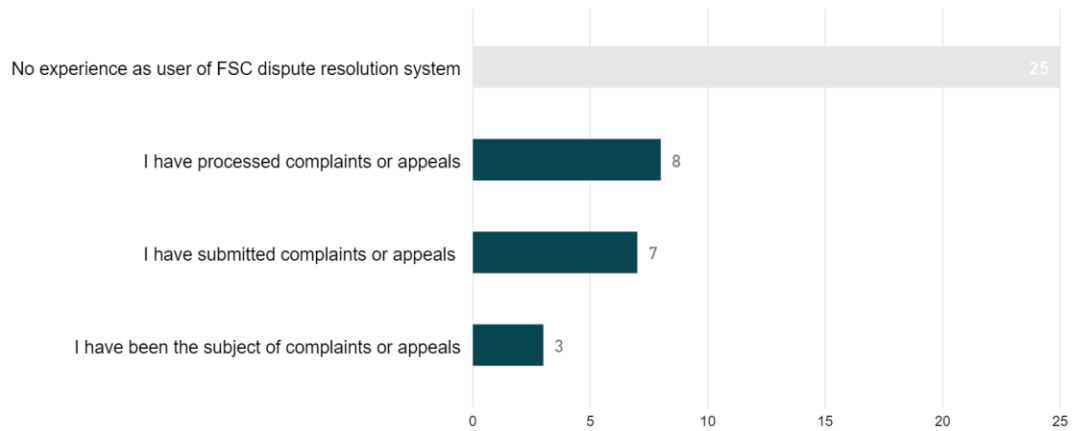
The largest membership chamber is Economic (13 participants) and the largest sub-chamber is Economic South (7 participants). 11 members (58%) are from the Global South and 8 members (42%) are from the Global North.

If you're a member, please specify your chamber



18 participants (42%) have experience of the dispute resolution system: as complainant (7 participants), defendant (3 participants), or organization managing complaints (8 participants) (with some participants falling into multiple categories).

Please tell us about your background of using the FSC Dispute Resolution System



Participants come from 21 countries. The country with the most participants is Brazil (11 participants, 26%).

Respondent location

