

# IMO I 2.4.10 e Complaints and Appeals Procedure

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### 1. Purpose and Scope

- 1.1 This procedure outlines the processes to be followed in order to address complaints and appeals in line with ISO 17065, § 4.6, 7.13, ISO 17020, § 7.5 - 7.6, and other applicable accreditation requirements. For FSC-related issues, FSC-STD-20-001 V4-0, § 1.9 applies.
- 1.2 Complaints are under the scope of this procedure if they are related to IMOsuisse AG's inspection or certification activities, or the activities of an operator certified by IMOsuisse AG (hereinafter IMO).
- 1.3 Appeals are under the scope of this procedure if they are filed by a client against a certification decision that he received from IMO.
- 1.4 This procedure is available to any interested party upon request.

As to FSC-related complaints and appeals, this procedure is accessible on the websites of both IMO and any local sites providing services on behalf of IMO in the local language of the country of operation. For forest management this information is publicly available in the same language as the public summary certification report published by IMO.

### 2. Terms and Definitions

- 2.1 Complaint:
  - 2.1.1 Expression of dissatisfaction by a client or third party relating to IMO's performance, i.e. its procedures, processes, or personnel.
  - 2.1.2 Allegation, made by a third party, against an operator certified by IMO, claiming that this operator is violating the certification standard or that the certified product is not compliant with the certification standard.
- 2.2 Appeal: Request by a client to reconsider the certification decision issued by IMO to his operation(s).

### 3. Corresponding documents

- IMO I 2.1.x Standard Control Procedures
- IMO I 4.2.x Client Contracts
- IMO I 2.4.10.1 Complaint Form
- IMO I 2.4.10.2 Appeal Form
- IMO I 2.4.11 Arbitration Procedures
- List of Complaints and Appeals per year

## 4. Description of procedure

### 4.1 Complaint handling process

- 4.1.1 Formal complaints need to be submitted to IMO in writing. Complaints received by phone will be registered but need to be confirmed by the complainant in writing. The complainant may send the complaint to imo@imo.ch.
- 4.1.2 Complaints need to include a clear description of the case, objective evidence to support each element or aspect of the complaint, and the name and contact information of the complainant.
- 4.1.3 Complaints are forwarded to the person in charge, which is the Head of Department concerned or the General Manager, depending on the nature and severity of the complaint.
- 4.1.4 All complaints are preliminarily reviewed by the person in charge.
  - 4.1.4.1 If the complaint is evidently unfounded or outside of the scope for complaints handling, the person in charge will reject the complaint in writing.
  - 4.1.4.2 If the complaint is within the scope for complaints handling, the person in charge initiates the complaint handling process as detailed hereafter.
- 4.1.5 In case the complainant is a third party asking for anonymity in relation to the IMO client, against which he is filing the complaint, IMO will retain the anonymity. This means, IMO will not disclose the name and address of the complainant to the IMO client concerned.
- 4.1.6 IMO will not response to anonymous complaints.

As to FSC-related issues, IMO will treat anonymous complaints and expressions of dissatisfaction, which are not substantiated as complaints, as stakeholder comments and address these during the next audit.
- 4.1.7 IMO is bound to confidentiality towards its clients and will not communicate the findings or the outcome of the complaint investigation to any third party:
  - 4.1.7.1 except for competent authorities or standard holders, if applicable.
  - 4.1.7.2 except when otherwise agreed between IMO and the client.
- 4.1.8 Each complaint case will be registered in the Complaint Form (IMO I 2.4.10.1) and forwarded to the Quality Manager for central registration in the list of complaints.
- 4.1.9 IMO will register all complaints with the relevant standard holder as outlined in the respective accreditation requirements.
- 4.1.10 As to FSC-related complaints, IMO will respond to complaints in the same language that is used in the public summary certification report, or will agree with the complainant on the language used.
- 4.1.11 As soon as possible, at the latest within 2 weeks (10 working days) the person in charge writes to the complainant to confirm receipt of the complaint and to provide an overview of the proposed course of action to follow up on the complaint.
- 4.1.12 The complaint is duly investigated in consideration of the facts provided, data in the project file as well as additional information obtained of the staff members concerned and/or third party experts, if relevant. Further information is requested from the complainant if necessary.
- 4.1.13 The person in charge keeps the complainant(s) informed of the progress in evaluating the complaint.
- 4.1.14 Based on the result of the investigation, the person in charge specifies all proposed actions in conclusion to the complaint within three (3) months of receiving the complaint. The measures to be taken are based on the requirements of the case:

They need to be reasonable with regard to necessary efforts/expenses as well as timely clarification of the matter.

They can be determined by relevant laws, regulations and standards.

- 4.1.15 In order to ensure that there is no conflict of interest, the decision resolving the complaint is taken by, or reviewed and approved by, person(s) not involved in the activities related to the complaint. Furthermore, personnel involved in the review or approval of a resolution to a complaint must not have been involved in consultancy tasks with or have been employed by the client in question for the past three years.
- 4.1.16 The person in charge notifies the complainant in writing when the complaint is considered to be closed, meaning that IMO has gathered and verified all necessary information, investigated the allegations, taken a decision on the complaint.
- 4.1.17 If applicable, the competent authorities and/or standard holders are included in the process.
- 4.1.18 The person in charge informs the Quality Manager upon the completion of the complaint procedure and forwards respective documentation to the Quality Manager for final assessment.
- 4.1.19 In case that no agreement can be reached, each party can call for the IMO arbitration procedure (see IMO I 2.4.11 e Arbitration procedures). The arbitration procedure must be pointed out to the complainant.
- 4.1.20 As to FSC-related complaints, the complainant may refer their complaint to ASI, if the issue has not been resolved through the full implementation of IMO's own procedures, or if the complainant disagrees with the conclusions reached by IMO and/ or is dissatisfied by the way IMO handled the complaint. As the ultimate step, the complaint may be referred to FSC.

## 4.2 Appeal handling process

- 4.2.1 Appeals need to be submitted to IMO in writing within 14 days after receipt of the IMO certification decision. The appellant may send the appeal to imo@imo.ch.  

The operation is informed about the right to appeal any IMO certification decision by the following indication in the notification of the certification decision: "This decision may be appealed within 14 days to IMO, Weststr. 51, CH-8570 Weinfelden."
- 4.2.2 Appeals need to include a clear description of the case, objective evidence to support each element or aspect of the appeal, and the name and contact information of the appellant.
- 4.2.3 Appeals are forwarded to the person in charge, which is the Scheme Manager concerned.
- 4.2.4 All appeals are preliminarily reviewed by the person in charge.
  - 4.2.4.1 If the appeal is outside of the scope for appeals handling, the person in charge will reject the appeal in writing.
  - 4.2.4.2 If the appeal is within the scope for appeals handling, the person in charge initiates the appeal handling procedure as detailed hereafter.
- 4.2.5 Each appeal case will be registered in the Appeal Form (IMO I 2.4.10.2) and forwarded to the Quality Manager for central registration in the list of appeals.
- 4.2.6 As to FSC-related appeals, IMO will respond to appeals in the same language that is used in the public summary certification report, or will agree with the appellant on the language used.
- 4.2.7 As soon as possible, at the latest within 2 weeks (10 working days) the person in charge writes to the appellant to confirm receipt of the appeal and to provide an overview of the proposed course of action to follow up on the appeal.
- 4.2.8 The appeal is duly investigated and the certification decision re-assessed in consideration of the new evidence or additional justification provided, as well as additional information obtained by other staff members and/or third party experts, if relevant. Further information is requested from the appellant if necessary.
- 4.2.9 The person in charge keeps the appellant informed of the progress in evaluating the appeal.
- 4.2.10 Based on the result of the investigation, the person in charge specifies all proposed actions in conclusion to the appeal within three (3) months of receiving the appeal.

- 4.2.11 In order to ensure that there is no conflict of interest, the decision resolving the appeal is taken by, or reviewed and approved by, person(s) not involved in the activities related to the appeal. This means, the person in charge must have been not involved in the certification decision questioned in the appeal. Furthermore, personnel involved in the review or approval of a resolution to an appeal must not have been involved in consultancy tasks with or have been employed by the client in question for the past three years.
- 4.2.12 The person in charge notifies the appellant in writing about the outcome of the appeal when the appeal is considered to be closed.
- The appeal is closed once IMO has gathered and verified all necessary information, assessed the evidence provided, and taken a decision on the appeal. If applicable, the certification decision needs to be revised and updated certification documents need to be issued according to scheme requirements.
- 4.2.13 If applicable, the competent authorities and/or standard holders are included in the process.
- 4.2.14 The person in charge informs the Quality Manager upon the completion of the appeal procedure, and forwards respective documentation for final assessment.
- 4.2.15 In case that no agreement can be reached between the appellant and IMO, each party can call for the IMO arbitration procedure (see IMO I 2.4.11 e Arbitration procedures). The arbitration procedure must be pointed out to the appellant.

## 5. Documentation

- 5.1 All complaints and appeals are recorded, as well as the actions undertaken to resolve them [STD-20-001 V4-0, 1.9.11]. The documentation in the file of the complainant or appellant, which is usually the client file, includes:
- The complaint / appeal received (with dates and original information)
  - IMO's confirmation of receipt of the complaint/appeal
  - All relevant communication and a complete description of the handling of the appeal/complaint including all persons involved
  - The outcome of the appeals/complaints procedure
  - Recommendations
  - Action taken and their resulting effects
- 5.2 The communication and relevant documents related to the appeal/complaint are also documented:
- in the file of other parties concerned, if relevant
  - in the file of parties that have to be informed of the case (e.g. relevant authorities)
- 5.3 The completed and signed Complaint/Appeal Form is filed in the central complaint/appeal folder with a reference to the filing location of all relevant communication and documents related to the case.
- The case is recorded in the list of complaints/appeals which is kept per year.