

# IMO Standard Control Program for Certification of Forests and Timber Products

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# 1 Definition and Basic Principles

- 1.1 The Standard Control Program has been approved by FSC. It guarantees the objectives and competent FSC certification of effective forest management, the processing and trade of forest products. The certification system of IMO is valid worldwide and a component of quality assurance for FSC products.
- 1.2 The IMO Standard Control Program is primarily based on the worldwide requirements of the Forest Stewardship Council (FSC), the principles & criteria (P&C), the regional standards and the many years of experience of IMO.
- 1.3 FSC distinguishes between the following scopes of certification: Forest Management (FM)”, “Wood Processing and Trade - Chain of Custody (COC)” and Controlled Wood (CW). Different requirements apply for these scopes.
- 1.4 The CW certificate can be issued for a Forest Management company alternatively to a FM certificate. COC companies can get a sole CW certificate or a full COC certificate including CW as additional scope.
- 1.5 Two types of certification exist: a “single certificate” for an individual company and a “group certificate (several owners)” or „Multi-Site certificate (one owner, several production sites)“. Group certification is possible for forest estates and processors. However, in case of processing companies group certification is only possible for small enterprises. Multi-site certification is possible for larger companies including their branch offices.
- 1.6 Before certification, particularly for large companies or complex issues, prior audit is possible with a pre-audit or an even shorter pre-evaluation.
- 1.7 Upon special request and written agreement, an audit according to other standards (e.g. Naturland, PEFC, DEMETER, organic agriculture, Social and FairTrade) can be carried out at the same time.

## 2 General Procedures

The basic flows of the IMO Standard Control Program apply to all types of certification; special requirements for the scope are described individually. It comprises the following procedural steps:

### 2.1 Inquiry

- 2.1.1 Inquiries for certification can be done by phone or mail. The staff of the Forest and Timber Department is responsible for inquiries. In addition to oral information, the interested company receives generally an information package containing the following:

Document	Annex
IMO – Standard Control Program	---
Fees	---
Contract of Control	Policy of sanction, catalogue of sanction, complaint procedure, arbitration
Various documents, information on demand	

## **2.2 Prior clarification, offer**

- 2.2.1 The company demonstrates its interest in the certification process by submitting concrete project documents and company data (application form). After discussing the alternatives with customers, further internal clarification follows at IMO according to the following steps:
- Delineation and definition of the company to be certified
  - Clarification of the scope of certification for the certificate desired (forest, timber processing, timber trade, Controlled Wood)
  - Detection of possibly problematic areas, clarification of any misunderstandings
  - Specification of the various project steps (pre-evaluation, pre-audit, audit)
  - Preparation of a budget plan and timetable.
- 2.2.2 Based on the results or the inquiry or the pre-clarification, IMO submits a written offer. By signing the offer or the contract of control, the company declares its willingness to take part in the control program concerned.
- 2.2.3 Upon explicit request of the company to be certified and with a data protection agreement signed, the control documents can be provided to other organisations for certification, federations or certification bodies.

## **2.3 Preparation of the audit**

- 2.3.1 Prior to the actual main audit (certification audit), any pre-clarification such as a pre-evaluation and pre-audit can take place as preparation.
- 2.3.2 A **pre-evaluation** is a punctual examination of certain queries, which are seen problematic by the company in order to get a rough estimation of the situation without deciding on positive or negative certification. Selection of topics and size are determined individually as well as size and format of the report.
- 2.3.3 If needed, IMO also carries out a **pre-audit** as a first step. For High Conservation Value Forests (nature conservation, cultural protection, protection against forces of nature etc.) in particular for large forests (as from appr. 10'000 ha), a pre-audit is compulsory. Stakeholders are identified and questioned. The stakeholder survey must be completed before the main audit starts.
- The aim is to clarify what work the company needs to do to fulfil the requirements for certification. An internal report describes how the company can satisfy these requirements and provides a concrete proposal for the main audit.
- 2.3.4 Certification is only possible based on a written contract. Once the company accepts the offer with its signature, an audit programme and a definite appointment is arranged, the contract and the contract number are assigned, and if necessary, dispatched with an account invoice.
- 2.3.5 Prior to initial audit, the company receives the basic questionnaire for a complete description of companies. It must be returned with additional documents such as the management plan and budget.

## **2.4 Main audit**

- 2.4.1 The **main audit** is the physical inspection of the company. The goal is the comparison of the company with the relevant standards in all points. The result is a report and a recommendation for certification including any conditions (corrective action requests).
- 2.4.2 The IMO office assigns the auditor or audit team considering any specific expert or local knowledge, language skills and experience in specific control areas. The same auditor should visit the company at most three times in a row. All company documents will be made available to the auditor who is bound to confidentiality.
- 2.4.3 The audit should be carried out quickly, efficiently, and impartially; to this end, conscientious preparation by the company is essential. The necessary documents and papers should be completely available for the audit. In addition, the presence of all responsible personnel for a sufficient period of time is important.
- 2.4.4 The audit is as a general rule possible at any time and is scheduled according to the kind of production as well as staff availability within the company. The duration is set individually for each business, whereby experience from preceding checks in the company is also taken into consideration.
- 2.4.5 In addition, IMO and FSC International reserve the right to make unannounced spot-audits and follow-up audits.

## **2.5 Certification**

- 2.5.1 The certification process comprises the revision of the audit report elaborated by the auditor, which was counter-signed by the company through the office, and other existing company files. The IMO certification committee makes the decision for certification based on the evaluation report and the recommendation of the auditor. Along with the report, the company also receives an invoice based on the current fee regulations.
- For certifying forest management, the individual expert opinion (peer review) and information from third parties (groups of interests = stakeholders) are taken into account whether the certificate can be issued or extended or in what way the results shown in the report require corrective actions to completely fulfil the valid standards.
- 2.5.2 According to the IMO sanction policy any resulting requirements are reported to the company in writing, as are the deadlines to correct the non-conformities. The evaluation report or notification letter or is to be counter-signed by the company and be handed over to the IMO. The company can appeal the decision within 14 days.
- 2.5.3 If the findings are satisfactory overall, the company receives a temporary certificate confirming the company's conformity with the standards (operating certificate).
- 2.5.4 Certified companies are published on [www.fsc-info.org](http://www.fsc-info.org). Third parties (stakeholders) have the right to raise objections to IMO. Complaints are publicly available, and IMO will address the objections.
- 2.5.5 The use of the logo for advertising and marketing for goods is limited to the contracting party; passing these rights to third parties is only permitted by a written declaration of acceptance.

## **2.6 Monitoring of fulfilment of the conditions / Surveillance audits**

- 2.6.1 The company is obliged to fulfil the conditions mentioned in the evaluation report within the time frame stipulated. Punctual fulfilment of the conditions will be checked and reminded if information is missing.
- 2.6.2 Annual surveillance (monitoring, follow-up) audits are required to uphold certification. In general, surveillance takes place once a year. If necessary, more than one audit will take place.

## **2.7 Revocation and suspension of the FSC certification**

- 2.7.1 Certificates issued and the right to advertise FSC products may be revoked in specific cases immediately or by a certain date according to the catalogue of sanctions under the following conditions:
- a) Preconditions for a decision to certify are not met
  - b) Conditions are not fulfilled even after several reminders
  - c) The company or IMO terminates the audit contract
  - d) Refusal of audit
  - e) Necessary information is not provided
  - f) FSC does not recognize the certification

In all cases, the company is notified of the revocation and any deadlines in written form.

- 2.7.2 FSC International will be notified of suspended or withdrawn certificates within 10 days. The company will be erased from the register of the certified companies; the date of suspension or withdrawal will be stated.

## **2.8 Re-evaluation**

- 2.8.1 One period of certification lasts 5 years as a maximum. After 5 years, the complete procedure for certification has to take place again.
- 2.8.2 This complete procedure comprises a complete examination of the total company according to the actual checklist and an evaluation report.
- 2.8.3 In case of forest estates, also stakeholders are informed and asked for comments. A new peer review, however, won't be necessary.
- 2.8.4 If a national standard for forest management received the status of a preliminary FSC accreditation, this standard replaces the locally adapted generic standard for re-evaluation at the latest.

## **2.9 Group certification**

In order to save costs, several companies can form a group. COC companies with several sites may apply for Multi-Site certification. The requirements for forest estates and processors are different; however the basics are the same. Detailed information is given in the separate IMO information on group certification.

The structure of the group can be defined flexible according to the requirements of the single companies and the particular situation. A group consists of the group management and at least two group members.

Each single member shall fulfil the specific requirements of the FSC standards, i.e. the requirements can't be changed or compensated between group members.

The certificate will be issued for the group management. The group management must be a legal entity and is the contract partner with IMO. The group management can distribute a copy of the certificate to the group members. . The group management is responsible for the fulfilment of the requirements and the internal quality control of the group members.

Group certifications are performed according to the following steps:

I.: Pre-audit or audit of the group

- Management plans, examination of documents
- Group management, organigram of responsibilities
- Visits of all relevant levels during main audit
- Elaboration of the internal monitoring-system for the group

II.: Introduction of the internal monitoring system (in case of forest certification: including stakeholder assessment)

- Clarification of membership and examination of group contracts

III.: Main audit at group management and members

### **3 Certification of forest management**

#### **3.1 Requirements**

3.1.1 For the certification of forest management, compliance with the ten international principles & 53 criteria of FSC is required. They are adapted to the regional context.

3.1.2 If FSC has accredited standards for the country or region, they are binding. Additional guidelines can be included by request.

3.1.3 If no accredited standard exists, the standard will be developed in collaboration with the stakeholders based on IMO's Generic Standard and FSC's Principles & Criteria and any draft versions. Such regional or national standards are always checked to ensure that they correspond with national laws. Once FSC approved a national standard, it will replace any former standard.

3.1.4 Forest management enterprises seeking certification against the FSC Controlled Wood™ standard are audited according to the relevant FSC standard STD-30-010 in order to guarantee that timber sold as FSC Controlled Wood™ does not belong to one of the following categories:

- Illegally harvested wood,
- Wood harvested in violation of traditional and civil rights,
- Wood harvested in forests in which high conservation values are threatened by management activities,
- Wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest uses,
- Wood from forest management units in which genetically modified trees are planted.

3.1.5 The procedures for issuing a CW certificate are almost identical to the procedures for an FM certificate. If not indicated as not applicable, all requirements below apply.

## **3.2 Special features**

### **3.2.1 Stakeholder consultation**

The consultation process is a method of participation for parties interested in the forest and its management. Interested representatives from the three fields of ecology, economy and social issues are informed about the upcoming certification and asked to make comments.

The goal of this participation is to identify potential conflicts and improve control of the extent to which the company fulfils the FSC requirements. The analysis of the stakeholder process affects the checklists and audit methods. Any concerns and the reaction of IMO must be discussed in the public certification report.

The standards used are made accessible to stakeholders for commenting. IMO chooses the suitable consultation process for the project, i.e. e-mail, mail, press releases, personal conversation. Comments can be made to the applied and published standards and to the company's performance. The deadline for any comments is at least four weeks.

### **3.2.2 Public evaluation report**

For forest enterprises, the evaluation report is divided into an internal and a public section. The company will approve both sections. Then, the report is official and after a positive certification decision, the public report will be published in the Internet.

The public section contains a summary of the audit results and the most important operating data. It does not contain any confidential operating data.

The internal section, however, is only determined for the owner of the certificate, FSC International and IMO.

### **3.2.3 External peer review**

The evaluation report for forest estates seeking FSC certification is reviewed by at least one independent expert before authorisation by the company. The task is to assess the professional competence and suitability of the report for the decision of certification. The peer review is bound to confidentiality. The external peer review is only necessary for the initial (main) FSC audit and not required for CW certificates.

## **3.3 Steps of the audit**

3.3.1 The actual audit consists of several parts; the sequence of the following steps is left up to the audit team:

- a) **Introductory discussion** with the local staff of the company.
- b) **Verification of the company documentation and implementation**; for surveillances, the correct use of the logos is checked.
- c) **Tour** through the forest. The auditor selects the areas (for group certification: group members).
- d) **Samples may** be taken for analysis.
- e) **Bookkeeping**: Check of the purchase and sales documents and calculation of product flow

- f) **Contacts** with stakeholders and local authorities
- g) The management will sign the **control report** with the findings.
- h) **Final discussion** about next steps, possible improvements etc.

## **4 Certification of processing of wood based products**

### **4.1 Requirements**

- 4.1.1 The requirements for wood-processing companies and sellers are described in the internationally uniform standards for the chain of custody. Depending on the activities of the company, various standards may apply. Central document is the COC standard STD-40-004.
- 4.1.2 The basic idea is that the flow of goods should be easy to trace and document from the end product to its origin in the forest. This can be done by physical separation of certified material (transfer system) or based on a calculation (percentage system or credit system) of input and output. The basic aspects in individual companies are the separation of certified and non-certified product groups , identification within the production process, and documentation of the quantity used.
- 4.1.3 The company must make sure that its supplier is listed in the FSC database or submits a copy of his certificate and that the supplier's delivery note and invoice explicitly indicate certified goods.
- 4.1.4 Various logo types exist depending on the material used within the product. The FSC standards regarding labelling have to be observed.

### **4.2 Special features**

- 4.2.1 Any company wishing to include uncertified material within a product group must guarantee, that any controversial sources are excluded from this material (see 3.1.4). The standard STD-40-005 applies for such companies additionally.
- 4.2.2 Sole traders have to be audited even if they only buy and sell material or products without processing them at all. Traders, which sell wrapped and labelled end products only to the final consumer are exempted from this requirement.
- 4.2.3 Enterprises including several sites with a legal and/or contractual relationship may use the Multi-Site standard.

### **4.3 Course of the audit**

- 4.3.1 The actual audit consists of several parts, though the order of the following steps is left up to the auditor:
  - a) **Introductory discussion** with the management of the company, clarification of the position of contract processors and suppliers in the control program.
  - b) **Examination of and amendments to fundamental operating documentation** such as article lists, upstream suppliers, origin of raw goods, plant layout, correct use of logos, updates and amendments to questionnaires.

- c) **Tour through the company:** Check of the statements in the questionnaire, the system of identification and separation. The auditor selects the operational area to be audited.
  - d) **Samples may** be taken for analysis.
  - e) **Verification of the company documentation and implementation**, possibly including the results of analyses.
  - f) **Bookkeeping:** Check of the purchase and sales documents and calculation of product flow
  - g) The management will sign the **control report** with the findings.
  - h) **Final discussion** about next steps, possible improvements etc.
- 4.3.2 The IMO office revises the documents and makes the certification decision.
- 4.3.3 In case of spot audits, the auditor restricts him/herself to a company sector. Surveillance and additional audits focus on any problems, product flow and on the fulfilment of the conditions.

## 5 Terms of the contract

### 5.1 Recourse

- 5.1.1 If a company does not agree with the findings of the audit or the conditions stated, desired changes of text passages can be sent to IMO. If no agreement can be achieved regarding the findings, the following complaints procedure can be applied:
- a) The company can file objections to the IMO office in written form within 14 days of receiving notification.
  - b) IMO confirms receipt of the complaint and informs the company within 14 days of its options, if there are any.
  - c) If no agreement can be reached, the usual arbitration proceedings are available.
  - d) FSC itself is the ultimate instance for FSC certification.

### 5.2 Publication of data and data protection

- 5.2.1 To maintain objectivity, IMO with all staff fulfil the following requirements:
- a) IMO and its employees agree to uphold confidentiality for all information gathered during the audit procedure. Business data from the company shall not be passed on to third parties without the expressed consent of the company.
  - b) The following data will be published after certification:
    - For wood processors and traders: Name and address, number of certificate, date of issue and expiry, products, timber species, activity (field of business), standard used and main output category.
    - For forest estates: Name and address, number of certificate, date of issue and expiry, forest area tree species and perhaps additional data from the public report, required by FSC. In addition, the public report itself in the local language and translation in English or Spanish plus the relevant FSC standard.
    - During the evaluation process of forest estates the public stakeholder procedure requires before certification information as follows: name and address as well as forest area, eventually annual cut and FSC standard.

- c) FSC International and state supervisory authorities and their employees also have access to the information gathered during the audit. They are also bound to confidentiality.
- d) IMO does not offer any consulting for companies certified by IMO.
- e) IMO and its employees are neutral regarding commercial policy and do not engage in any commercial activities.
- f) Generally, IMO offers its services to all companies.

## **6 Costs and Services**

The costs of the audit are payable by the client. IMO tries to keep costs down. One way of doing so is to combine several clients in one audit tour. In general, the current scale of charges and fees apply. IMO reserves the right to retain the issue of the certificate until the costs were paid in full.

In addition to the visit of the audit team, IMO performs the following services:

- Planning and organisation of the audit
- Specific preparation by the auditor for the company
- Writing of the evaluation report
- Peer review
- Processing of the audit files at the branch office
- Certification, including a letter of notification
- Contacts with FSC and stakeholders relevant for certification
- Preparation of information, e.g. the standards, info service.
- Ongoing training for IMO employees
- Other correspondence (requests etc.)