

Sanction Policy for the Forestry and Wood Industry

1. Definition and goal

Sanctions are measured imposed by the certification agency on the company desiring certification. They are intended to get the company to fulfil directives completely by a certain deadline.

2. Sanction level

The levels of the sanctions are based on the line of business and area checked in accordance with the requirements of the respective directives, ordinances and authorities performing the checks. The sanctions are tailored to specific cases with respect to the severity of the breach and its consequences.

If the causes of the sanctions are not remedied by the deadline, the sanctions are normally raised one level. In some cases, several sanctions may be imposed (such as for obligation to provide more documentation and reports plus subsequent checks).

In addition, see the catalogue of sanction levels with examples for specific cases (IMO CONTROL CH I 4.5.2a). IMO documents all sanctions by company.

3. Imposition of sanctions

The catalogue of sanctions is used to determine the measures (sanction level) once it has been determined that directives for certification have not been upheld. Each breach of a guideline is assessed separately and not affected by others. IMO takes all of the available information into account, including information from third parties, and may even make a decision during the validity of a certificate.

IMO's certification committee decides whether to impose sanctions, possibly in co-ordination with FSC International. An advisory of the following is enclosed in the notification of the decision: *Objections to this decision can be filed in writing at IMO within two weeks of its proclamation.*

If no recourse to the sanctions imposed on the company are taken by IMO, the last recourse is FSC International. An advisory of the following is enclosed in the notification of a rejection of recourse: *Objections to this notice can be filed in writing at FSC International (name and tel./fax, email of the general secretary) within two weeks of its proclamation.*

4. Expiration, termination, suspension or withdrawal of certification

In case of discontinuation, IMO sends a notification to the company, which clearly indicates

- a) the status of the certification: expiration, termination, suspension or withdrawal
- b) the former cert. no.
- c) the date of official invalidity
- d) the rationale such as the breach of the certification contract or non-compliance with the standards (including name, version number and date). In case of expired or terminated certification, it refers to the voluntary decision of the company or the agreement with IMO.
- e) the withdrawal of all uses of the Trademarks and/or statement 'Controlled Wood' in any sales and transport documentation. In case of long lasting discontinuation, any promotion material which bears the IMO logo, the logo of the certification scheme and other relevant labels or references to certification is withdrawn.
- f) In case of Controlled Wood certification for the purpose of sourcing controlled material into 'FSC Mixed' product groups: the requirement to stop using controlled material in any FSC production.
- g) All relevant customers who were provided with certified goods shall be advised of the suspension or withdrawal in writing within three (3) business days. The advices shall be recorded.
- h) In case of withdrawal the original certificate shall be returned to IMO or destroyed. Any electronic copies and hardcopies shall be destroyed and deleted respectively.
- i) The company shall acknowledge in writing the receipt of IMO's letter, confirm the invalid status of the certificate and the aforementioned actions taken.
- j) The company will be taken off the public list of certified companies and/or the licence grantor and/or any parties involved will be informed of the annulment of the certificate.

For clients for FSC certifications this document in its current version comes into force two weeks after shipping by IMO.