

A PRACTICAL GUIDE TO DEVELOPING A GROUP SCHEME FOR FSC-ACCREDITED CERTIFICATION OF FORESTS

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1 How to use this guide

This guide aims to provide practical advice to anyone wanting to set up a group certification scheme. It describes specifically the requirements for FSC certification, but may also be useful for those setting up group schemes for other standards. It is divided into six sections:

1. This section on how to use the guide
2. An introduction to certification in general and group certification in particular. This is useful if you want some background information, but if you are already familiar with certification you may not need to go through it again.
3. Setting up a group scheme – this provides a step-by-step guide to what you need to do to set up your own group scheme.
4. What do group members have to do – this section focuses on what the members will need to do and helps you to ensure they will be properly prepared.
5. Chain of custody – this section discusses the need for ensuring the traceability of the wood produced by group members, an essential requirement if the wood is to be sold as ‘certified’.
6. Getting certified – finally, section 6 explains how the certification process works and how a group manager should go about getting the group certified.

Where documentation is required, templates have been prepared and can be found in Appendix 1. Some of these are ready to use, while others will require some further work to customise them for your particular situation. Even those documents which are ready to use can always be amended to suit your particular circumstances. Alternatively, you may decide to develop your own system and not use the examples provided here.

To provide some ‘practical examples’ we have included three different ‘model’ group schemes. Our aim is to provide practical guidance on the approach which might be taken by groups of different sizes, complexity and membership type. Details of the case studies are given in Box 1 and examples of how each of these groups might meet a particular requirement are given throughout the guide.

It is up to you how you use the guide, but if the concept of certification and group schemes is new for you, it might be best to begin by reading through the whole guide to get an overall impression of what will be required. The sections can then be taken one at a time and considered in more detail. Those wishing to begin the development of a group scheme immediately are directed to Section 3.

2 Introduction to group certification

2.1 What is certification and why is it needed?

Forest certification is the solution to a problem. The problem, which appeared through the 1980s and 1990s was a growing concern among mainly western European consumers about the impact on forests of timber harvesting. Forest managers and timber harvesters in many parts of the world were accused of destroying the forests they managed, while companies dealing in timber and paper products in Europe and the US found themselves the focus of campaigns and boycotts.

This was becoming an increasingly serious problem for companies which wanted to continue to sell wood and paper products but were concerned about the bad publicity this might attract.

At the same time, many of the campaigning groups were concerned that the results of their campaigns might simply be to drive companies away from the use of wood and to substitute it with other materials with a more negative environmental impact. Therefore, there was a strong feeling that the message should not be 'don't buy wood' but 'don't buy wood from badly managed forests'.

Thus, it quickly became clear that there were now two key questions:

- i. What is 'good forest management'? If everyone could agree on what constitutes an acceptable level of management for a forest then companies would know what type of source they should be seeking for their wood and paper products.
- ii. Which forests are being managed well? Given the history of mistrust and misinformation within the industry, it was also essential for companies to have a mechanism for verifying that forests were being adequately managed.

The solution to this problem already existed in many other sectors where there was a long history of *standards* and *certification*:

- A published and widely accepted standard is an excellent way to define what is 'good forest management'.
- Independent third-party certification is the most common way to demonstrate that a standard is being met.

Once both of these are in place,

- forest managers can ensure that their management meets the accepted standard and have their forest certified to verify this,
- companies dealing in wood and paper products can aim to purchase all their products from certified forests, and
- campaigning groups can support wood purchases from certified forests and target companies purchasing from badly-managed, uncertified forests.

The Standard

There have been a number of processes around the world which have developed international, regional or national standards. One of the most widely supported and used within the wood and paper sector is the Forest Stewardship Council and its international set of Principles and Criteria (FSC P&C). These set out the technical, economic, environmental and social requirements for good forest management, providing a standard for forest managers to aim for.

Certification

Credible independent, third-party certification requires two different organisations:

- The Certification Body (or Certifier) – this must be an independent organisation which has the systems, training and people needed to assess whether or not a particular forest company meets the requirements of the standard. The Certification Body is the organisation which actually carries out the assessment work.
- The Accreditation Body – in order to ensure that the certification body does its job properly, another organisation is needed to 'certify the certifiers'. This process is known as accreditation and for the FSC is carried out by the FSC Accreditation Unit. A list of Certification Bodies accredited by the FSC is shown in Appendix 2.

Details of the certification process can be found in Section 6.1.

2.2 Why group certification

Once certification had begun to gain support as a way of verifying that the origin of wood and timber products was acceptable, the demand for certified products started to grow, particularly in Europe and North America. However, it quickly became apparent that certification created some problems for small forest owners and managers.

Managers of small forests, often based in remote areas, did not have easy access to information about certification so it was difficult for them to understand what it was, what changes in management it would entail and how to find and engage a certification body. It was also much more expensive per hectare or cubic metre of production relative to large organisations which can benefit from significant economies of scale both in implementing the requirements of the standard and in getting certified.

Group certification aims to overcome these problems by pulling together a number of small forest areas under a single 'group manager' who acts both as a source of information and is also able to organise a certification process which allows each individual group member to benefit from the economies of scale of being part of a larger group.

2.3 How group certification works

The idea behind a group scheme is that, by joining a large number of small forest areas together in a group, each member can benefit from the savings of scale, while not losing control of their own forest and its management.

A group certification scheme consists of a 'group manager' (which can be an individual, organisation, company, association etc) who develops a 'group scheme'. Individual forest owners/managers then join the scheme and their forest is certified as part of the overall group. Most group schemes allow for some variation in approach to forest between each member providing that the result meets all the requirements of the scheme. This is shown schematically in Figure 1.

There are two major advantages to a group scheme:

1. The cost of certification per member is much lower bringing it within reach of almost all forest managers. This reduction in price is due to two main factors:
 - the group manager is responsible for monitoring members. The certification body then audits the group manager and a *sample* of members, but does not need to visit every member as would be necessary for individual certification.
 - the certification process is a very strict one and involves a number of requirements such as consultation, report writing and peer review (see Section 6 for details). These need only be done once for a group certification so the costs are shared between all members instead of being borne in full by each member as would be the case for an individual certification.
2. The group manager is able to provide information, training and support to members and the members themselves can share experience and costs of change and improvement. This is important because early results have shown that major barriers to good forest management and to certification are:
 - the costs and difficulty of understanding the standard (and sometimes even the law),
 - lack of knowledge on how to comply with requirements of the standard,
 - inability to access specialist advice or information in areas such as soil and water protection, biodiversity and consultation.
 - lack of information on what certification is and how to obtain it;

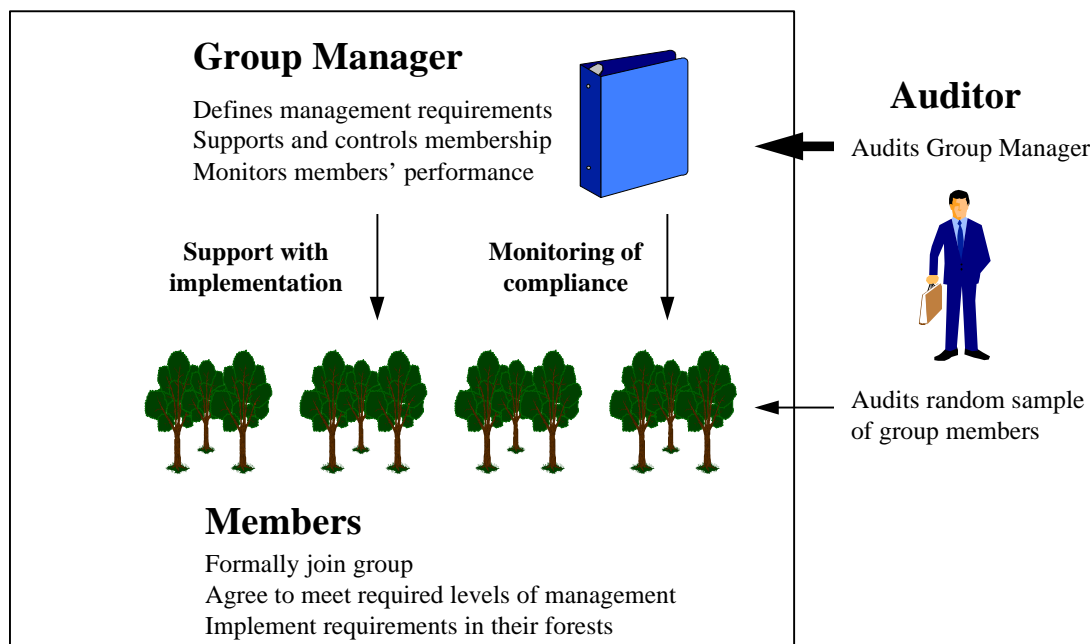


Fig 1: A schematic representation of a group certification scheme

A variation on the group scheme is 'Resource Manager Certification'. A resource manager is a forester, forest management company or other organisation which manages a number of forests on behalf of the owners.

In this case the group is rather easier to manage since the resource manager makes all decisions about forest management directly and is therefore directly in control of compliance.

2.4 Relationship of group manager to certification body

As well as setting up and managing the group, a group manager is the main contact between the group and the certification body. It is the group manager who will be certified and hold the certificate on behalf of the group.

Usually, it is the group manager who contacts and selects the certification body, sets up the assessment visits and accompanies the auditors during their visits. It is also the group manager's responsibility to report back all findings to the members of the group and to ensure that any problems identified by the auditors are addressed.

More details about the certification process as it relates to both group managers and group members can be found in Section 6.

3 Setting up a group scheme

There are a number of requirements which all group schemes must include. This section summarises what they are and then examines how each of them can be developed.

The main components which must be present in all group schemes are:

- A legal entity – the group or group management organisation must exist as a legal entity in order to sign agreements with members and the contract with the certification organisation on behalf of the membership.

- Management structure and job responsibilities – it is very important for communication with both members and certifiers that the group management structure is clearly defined together with the responsibilities of each member of the management team.
- Membership requirements – each group manager needs to define:
 - i. what type of members the group is designed for,
 - ii. requirements to join the group,
 - iii. rules for leaving the group,
 - iv. rules for being expelled from the group,
 - v. procedures for dealing with complaints from members or third parties.
- Interpretation of the standard for group members – a major part of the group manager's job is that of interpreting the FSC standard as it applies to the particular circumstances of the proposed group membership.
- Monitoring – in order to maintain the group, the group manager must have a programme to regularly monitor the members and ensure that they continue to comply with group requirements and the standard.
- Record keeping – the group manager is responsible for keeping the records of each member.
- Training – minimum training requirements for staff and contractors of the group manager carrying out various tasks (eg monitoring of members) should be defined. It may also be useful to develop training programmes for prospective and current members.

Each of these is discussed in more detail below. To provide examples of how some of the requirements might be met in practice, three model group schemes are used as illustration. Details of each model group are given in Box 1.

Box 1: Three examples of group management schemes
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<p>Group 1: A community NGO employing one forest technician 3 days a week and a part time secretary. Membership planned to be up to 100 small-scale farmers in the community each owning up to 25 ha of secondary natural forest which is harvested on an occasional basis.</p>

<p>Group 2: A company employing 3 professional foresters and a full-time secretary. Membership planned to be up to about 250 small to medium forest owners each owning between 25 and 1000 ha of plantation forest.</p>

<p>Group 3: A forest owners' association with 2 foresters and one full time secretary in headquarters and 1 forester and some secretarial support in each of the three regional offices. Membership planned to be an unlimited number of small to medium private owners (both individuals and companies) managing both natural and plantation forest ranging from 100 to 5000 ha per owner.</p>

3.1 Legal entity

The FSC requires the group scheme to exist legally and so the group management needs to be a legal entity. There is a wide range of legal entities which can and have been used, including:

- a company, including a company owned and run by an individual,

- a private or an industry association,
- a non-governmental organisation,
- a government organisation,
- a community organisation.

This variety in the type of organisation which is the 'group management' can be seen in the three model group schemes which range from a single person to a large company.

If you are unsure about whether the entity you intend to use to run the group scheme is a legal entity, some questions you could ask are:

- is it legally registered as a company or organisation of some sort?
- does it have an official address?
- does it pay tax?

If the answers to the questions above are 'no' or 'don't know' then you should check with a certification body or a local lawyer whether you have a legal entity.

If you do not have a legal entity then you will need to set one up. The most appropriate type of organisation or company will vary depending on both the country you are in and your particular circumstances, but it is not necessarily complicated. You could seek advice from a lawyer, financial advisor or your certification body.

It is worth remembering (and explaining to anyone who gives you advice on this) that as a group manager you will hold a certificate on behalf of all your members and that, if anything happens that results in the certificate being withdrawn, you may be professionally liable.

3.2 Group management structure

The group management may be an individual, a company or an organisation. A specific person must be designated as the 'group manager' and have ultimate responsibility for ensuring that the group is properly run. The group manager may actually do many of the tasks required, or may delegate most of the tasks to other people in the organisation or to external consultants. Whatever the structure, it is nearly always useful early on in the process of setting up a group scheme to produce an organisation chart and begin assigning responsibilities to each of the positions in the chart. Alternatively, you may prefer to have a list of responsibilities and then assign people to each one.

Most certification bodies will probably want to see something of this type, and group managers often find it is very useful for giving to group members too.

The organisation chart may include few or many people, but should include anyone responsible for a part of the group management activities, including consultants or group members if appropriate.

You may find it useful to start sketching out an organisation or responsibility chart now and add information to it as you start to develop your scheme. An example of a responsibility chart can be found in Appendix 1.

3.3 What type of membership is the group for?

The next step in forming a group is to decide what type of member will be eligible to join the group. This is important because many of the requirements discussed below will vary depending on the type of member – the larger and more complex the

membership, the more complex the group system and group requirements will need to be.

Some groups are set up for a very specific type of membership, for example small private ownerships of less than 50 ha, members of the local community, members of the association running the group. Others are set up to allow a wider mix of members.

Try to define the type of member your group is for, both to guide yourself and to give to potential members to explain why they can, or cannot, join.

The definition can be flexible and, if it doesn't work, it should be changed. But it is very helpful to have a framework.

- Size:** Will you have a minimum or maximum size limit?
- Minimum size: some groups are set up to deal only with forests large enough to have regular production or a specific level of management. In such cases a minimum size may be specified.
- Maximum size: As forests get larger there are more issues which need to be addressed by managers. Since most group schemes make a number of assumptions about the issues *their* members will deal with, it is common to dictate a maximum size. You should also check whether your certifier specifies a maximum size.
- Type:** Forest type is an important factor in management. Natural forests and plantation forests pose different management challenges and may not both fit in the same group. In addition, some groups are strongly involved with marketing and so restrict membership to forests producing particular types of timber.
- Management:** Different forests have different managers. Some groups exist only for forests managed by professional foresters, other groups are exclusively for forests managed by their owners, while some groups do not specify.
- Location:** Some groups are very specific to a particular location. Others accept members from an entire region or even a whole country.
- It would not normally be possible to have a single group covering several countries because of the differences in legal requirements. However, there is no reason why one manager cannot run two very similar groups in the two countries.
- No of members:** The larger the number of members, the better organised and resourced the group will need to be.
- Cost of joining:** The group management may be funded by an external organisation. However, if it is to be self-funding then it will have to charge members a membership fee, plus possibly annual monitoring fees. These should be planned in advance to make sure that they will ensure a sufficient income to run the group. They will need to be adequate to cover both the costs of group management and the costs of certification.
- It is a requirement for certification of a group scheme that members are informed in advance of the approximate costs of joining and of maintaining membership.

Details of how the three model forests defined the type of members they planned to include are shown in Box 2.

Box 2: Membership type for each model group			
	Model Group 1	Model Group 2	Model Group 3
Size	25 ha max	25 – 1000 ha	100 – 5000 ha
Type	Natural forest	Plantation	Any
Ownership	Small farmers	Private landowners	Any
Management	Owner	Owner or professional	Any
Location	Within 100 km of group management office	Anywhere within province	National
Maximum no. of members	100	250	Unlimited
Cost	Free – income provided by parent organisation	\$100 per year	\$200 - \$2000 per year depending on size

3.4 Interpreting the requirements of the certification standard

One of the most important and difficult tasks facing a group manager in setting up a group scheme is to understand the requirements of the FSC standard and to interpret them for group members. How this is done will depend on the progress of the national FSC standard working group as described below.

3.4.1 How the FSC standard works

The global FSC standard consists of a generic set of Principles and Criteria (the FSC P&C) a copy of which can be found in Appendix 3. These principles and criteria have to be very general so that they are applicable to all forests sizes, types and locations throughout the world. Therefore, they are not designed to be applied directly to forest management. The FSC P&C are designed to form a basis for the development of national or regional forest standards developed by local working groups around the world.

Once a national standard has been developed, it must then be submitted to the FSC to be analysed to ensure that it is consistent with the international FSC P&C and then endorsed. Once there is an endorsed national FSC standard, this is used as the basis for all certification in that country.

However, if there is not an endorsed FSC national standard, then certification must be based on an interim interpretation of the FSC P&C which the certification body will have to make. The group manager will also have to do this in order to decide what the group requirements should be. If the development of a national FSC standard has already begun then this should help considerably, but if it has not then the job of interpreting the standard for the group scheme may be quite difficult.

In summary, there are three possible situations a group manager will be in with relation to the FSC standard:

- a. an endorsed FSC national standard exists;
- b. a draft FSC national standard exists but has not yet been completed or endorsed;
- c. no FSC national standard exists, even in draft form.

3.4.2 Developing group requirements from the standard

As you will see if you read the FSC P&C or your national FSC standard, it is quite long and complex, and it is often not immediately obvious to forest managers what they have to do to implement the requirements. Therefore, many group managers make an interpretation of the standard – the group requirements - for their particular group. The extent to which you will need to do this for your group will probably depend on two things:

a. Whether or not there is an endorsed FSC national standard

As discussed above, the international FSC P&C have to be interpreted for each country. If this has already been done through a national standard process, then you will not need to repeat the process. However, if it has not been done, then you will need to make some interpretation of the FSC P&C for your group;

b. What type of membership you have in your group

All group members, whatever the type and size of forest they manage must meet the standard, but the FSC is very clear that the way it is met should be **appropriate** to the size, type and complexity of the forest in question. Therefore, to meet some of the requirements of the standard, a large, intensively managed forest might well need a considerably more sophisticated system than a very small forest.

This is particularly likely to be the case with the requirement for documentation – both management planning documentation and internal systems such as procedures and work instructions. In many cases it also applies to requirements such as conservation, consultation and monitoring as well.

3.4.2.1 Using an endorsed FSC national standard

If an endorsed FSC national standard exists, then this is the standard which all of your members have to meet, so it must be the basis for all of your interpretation work for your group.

If your membership will be made up mainly of medium or large forests managed by professional forest managers and there is already an endorsed FSC national standard for your country, then you may decide that there is no need for the group manager to make any interpretation and simply provide your members with a copy of the FSC national standard. However, it is always useful to discuss with applicants and existing members how the standard should be implemented.

If your membership consists mainly of small, non-professional forest owners or managers, then you may not feel that it is appropriate to simply give them the FSC national standard and tell them to implement it. In this case, you may decide to provide some interpretation and guidance for members.

3.4.2.2 Using a draft FSC national standard

If there is not yet an endorsed FSC national standard, but there is a national working group which has developed a draft which is not yet finalised, then this is probably the best starting point.

You will need to be clear yourself, and make it clear to all of your members, that once the standard has been endorsed you will have 12 months in which to ensure that all group members comply with the endorsed version of the standard. Therefore, if you decide to base your group requirements on an early draft of the standard, you should make sure that you review each subsequent version to check that the group is still conforming.

If the draft national standard is at an advanced stage, or has already been submitted to the FSC for endorsement and is not expected to change significantly, then you can treat it in a similar way to an endorsed standard (see 3.4.2.1 above).

If it is still a relatively early draft and likely to undergo further significant change, then you may be better off treating it as you would the FSC P&C (see 3.4.2.3 below).

3.4.2.3 Using the FSC P&C

If no national standard is available, even in draft form, then you will have to use the international FSC P&C and make your own interpretation for your group. This is usually more time-consuming and difficult than using an existing standard, so it is a good idea to look for all the help you can find. For example:

- Are there other countries with similar forest types and socio-economic conditions which have already got an FSC standard which could be used as a guide? If so, get a copy from the FSC and use this.
- Are other companies or groups developing schemes, or have they already been certified in your country? If so, ask them for a copy of the interpretation they have used.
- If there are any certificates in your country then the certification body will have developed an 'interim standard' on which to base the assessment. Find out from the FSC web site, or by contacting the FSC Secretariat, which certification bodies were involved and then go to their web sites or contact them to ask for the interim standard.
- If there has not been any certification in your country, then see if there has been any certification in similar forests in nearby countries and try to get information on those.
- Is there a non-FSC national standard? If one exists then it may be a helpful guide. In particular, if it has been developed by, and has the support of, a wide-ranging and inclusive group which involved environmental organisations, community groups, indigenous people and trade unions as well as the industry and government, then it is likely that its requirements will be a reasonable guide to the interpretation of the FSC P&C for your country.

3.5 Membership requirements

One of the most important roles of the group manager is to define the requirements for membership of the group and to manage group membership. Therefore, an important part of developing a group scheme is to develop the membership requirements.

There are a number of specific requirements for membership which must be met, both in order to ensure the group runs smoothly and to make sure that the requirements of the standard are met. In particular, you need to develop:

- Requirements and procedures for joining the group.
- Conditions for leaving the group.
- Procedures for expulsion from the group.

Each of these is discussed in the following sections.

3.5.1 Entry to the group

Group certification schemes are usually set up to help forest owners find a cost-effective and simple way of accessing forest certification. Therefore, it is important that the application process is clear and straightforward.

At the same time it is important to remember that a key feature of a certified group scheme is that **as soon** as a new member joins the scheme, the forest they manage will be considered certified. Therefore, the group manager is responsible for ensuring that only managers whose forests are **already** meeting the standard required for certification are allowed to join the scheme.

The most common way to achieve these combined objectives is through developing and using a three-stage process beginning with provision of information, moving on to formal application and ending with a pre-entry inspection. Each of these is described below.

3.5.1.1 Provision of information

When someone is interested in joining the group, the first thing they will need is information about the group and what it means to join it.

There are a number of ways that information can be provided, for example, through an 'application pack' of documents, an information meeting or seminar, a visit by a member of the group management staff to discuss requirements or a combination of two or more of these approaches. In general, a basic set of documents containing key information is very important and should be a part of all group schemes.

The information provided should include, in a format appropriate to the type of member:

- General information on the group scheme including who runs it, the type of membership it has and, if appropriate any links or affiliations it has (for example, is it funded by a particular company or non-governmental organisation, is it run by an association).
- The obligations of group membership including joining, leaving, expulsion and monitoring as discussed in this section and Section 3.7.
- The FSC standard (or its interpretation as group requirements) the applicant will have to meet. For further discussion of this see Section 3.4;
- The certification process including both the initial assessment by the group manager (discussed below), and the activities of the certification body (described in Section 6);
- The certification body's and FSC's rights of access throughout the duration of the certificate for either scheduled or unscheduled visits (see Section 6.1).
- The requirement for provision of public information on the member's forest both as part of the requirements of the standard and as part of the certification process (see Section 3.6 and 6.1).
- The complaints procedure including both dealing with complaints from third parties about group members, and from group members about the group management (see Section 3.6).
- Costs of group membership including initial fees, annual fees and any additional costs associated with identification of problems.

Put together, this is quite a large amount of information, so some group managers prefer to prepare a summary of the information which applicants can more easily read and understand while they are deciding whether they really want to join the group.

If you are setting up a group whose members cannot read, or find reading difficult, then you should find an alternative way of providing this initial information such as a public meeting.

3.5.1.2 Application

If someone decides that they definitely do want to apply to join then two things are required:

- a. The applicant must be provided with full information on the requirements of membership either as documents or through verbal explanation.

If you decide to use a verbal form of communication then you need to ensure that you have a formal procedure for doing this with a list of all the issues to be explained and some means (such as tickboxes or space for initials) to confirm that each of the issues has been covered.

The approach taken by each of the model groups is shown in Box 3.

Box 3: Provision of information to applicants

Model Group 1: although most of those joining the group can read, many find it difficult, especially reading anything in formal language. Therefore, the group manager uses mainly verbal communication.

This begins with a public meeting which is held once every 4 months when interested members of the community can come and get basic information on the group and its requirements.

If anyone then decides to proceed with an application, the group manager visits them and goes through each of the elements of the group requirements. To ensure nothing is forgotten he has a set of notes and a summary sheet where he can tick off each subject when it has been discussed. The applicant also signs off each subject to confirm he or she has understood.

Finally, the applicant is given a summary of the most important requirements to act as a reminder. All members have access to the group office to see the full documentation should they wish to.

Model Group 2: The group manager has prepared a 4 page summary about the group and its requirements which is sent to anyone who expresses interest in joining.

Having read this, if anyone decides to proceed with an application they are invited to the company office where one of the foresters spends about an hour with them explaining the group requirements which are collected in a 'Members' Handbook' (see Section 4). The applicant is then invited to fill in the application form and is given a copy of the Members' Handbook to take away. Applicants are charged a preliminary fee of \$30 for this meeting.

Model Group 3: Anyone expressing interest in joining the group is sent a summary about the group and its requirements.

If they express interest in submitting an application to join, an application pack containing information on all group requirements and an application form is sent out. The application form must be completed by the applicant and includes a statement that the applicant has read and understood all the requirements of the group contained in the application pack.

If the application is successful, much of the information in the application pack

is subsequently transferred to the file which is used as the Members' Handbook.

- b. There must be a formal membership document which must be signed by the applicant which states that they:
- Understand all the requirements of membership – you may choose to include a summary of what the key requirements are to act as a reminder.
 - Wish to be a member of the group.
 - Intend to remain in the group in the long term and manage their forest in accordance with the requirements of the group.

This is a requirement for all groups which want FSC certification. If there is any reason why you think it will be a problem for your members to sign a membership agreement then you will need to talk to the FSC or your certifier as soon as possible. An example of a membership document can be found in Appendix 1.

Some group managers also ask applicants to provide them with more general information at this point. It is probably useful to develop a form for collecting basic information such as the name and contact details of the owner or manager, the name of the forest and details of its location, size, species and production. You may also want applicants to include a summary of issues relevant to the standard such as information about rare species, conservation, use of the forest by local communities or anything else important. Remember, though, that if they join the group then you will end up with a copy of their management plan so don't ask for too much repetition. An example of this type of application form can be found in Appendix 1.

3.5.1.3 Pre-entry inspection (Initial assessment)

The pre-entry inspection is one of the most important jobs of the group manager because, **as soon** as anyone joins the group, their forest is automatically considered certified. Therefore, it is essential that the group manager is completely sure that the applicant meets the certification requirements before they are accepted as a new member. If new members are accepted who do not meet the standard, then the certificate may be withdrawn and all the existing group members will lose their certified status so this process is absolutely essential to the integrity of the group.

The pre-entry inspection begins when the completed application documents are returned, and usually starts with a check that the forest meets the basic requirements of the group. If there are rules about the minimum or maximum size, forest type or location or ownership, then all these must be met. It is also sometimes appropriate at this stage to confirm that the applicant is the legal owner or manager of the forest area.

If there are no problems, then the process can move on to the next stage which is the check that current management in the applicant's forest meets all the requirements of the group (and therefore of the standard).

There should be a specific person or people responsible for carrying out pre-entry inspections. This might be:

- The group manager – because the pre-entry inspection is so important to the integrity of the group, some group managers prefer to do it themselves. This also ensures that they have a good knowledge of each of the members and their forests. However, the group manager is not always the most appropriate person. For example, he/she may not have time, may not have the technical knowledge to carry out the inspection or may not be located locally.

- Members of the group management staff – in larger groups, particularly those run out of several offices, it is usual that local staff carry out pre-entry inspection visits.
- An external consultant – in some groups there is either lack of knowledge or lack of time for the group manager to carry out the pre-entry inspection themselves and so a consultant or specialist is hired to do the job. This might be a consulting forester, an academic, a specialist auditor, even a member of staff from a large company offered as support for a smaller community-based group.
- Group members themselves – finally, some groups find that the best way to minimise costs is to have the group members themselves carrying out pre-entry inspections. There are a number of advantages to this approach: it is cheap, the members have a strong interest in seeing the quality of group members maintained since it is their certificate at risk and it ensures that members feel actively involved in their own group. However, if you do decide to use this approach, some degree of training and monitoring are essential.

It is a very good idea to provide inspectors with some training. Training for inspectors is discussed further in Section 3.9.1.2.

The pre-entry inspection must be designed to check that the applicant's forest management is meeting each requirement of the standard (see Section 3.5 for further details on interpretation of the standard). It is also very important that this process is documented so that it is easy to prove that the member was checked and to see if any issues were identified at the time.

There are a variety of ways of carrying out and recording a pre-entry inspection but with few exceptions the easiest way is through a visit to the applicant by the person designated by the group manager using a checklist.

The advantage of using a checklist is that it is a very practical way of ensuring that each of the requirements of the standard has been checked, and that there is a record that it was checked and, if any problem was identified, what it was.

It is possible to make the visit without a checklist, and it is not uncommon to hear people claim that they have all the requirements of the standard in their head and do not need a checklist to remind them. However, experience has shown that even the most experienced auditors almost always forget to check some things unless they have a checklist to remind them what has, and what has not, been looked at already. Box 4 provides some guidance on designing a pre-entry checklist

Box 4: The pre-entry inspection checklist

The checklist can be organised in any order that suits the group. Some are in the order of the FSC P&C. Some are organised to go through documentation first and then collect information from the forest second. Others are organised around the way forest management is carried out – planning, silviculture, harvesting etc. There is no right or wrong way – it is always best to use the approach that best suits you and your group.

There are also a number of ways to format the checklist. This depends partly on how much information you intend to collect.

- Check boxes only – some checklists consist only of the list of requirements together with checkboxes to tick for compliance or cross for non-compliance. These have the advantage of being very simple and quick to complete but do not provide any information on why there is (or is not) compliance.
- Check boxes with comments – some checklists combine checkboxes with a

space for comments which can be added, for example, whenever there is a problem to explain why the standard is not met.

- Comments only – it is also possible to have checklists where a comment is required for each requirement. This usually takes significantly more time to complete, but provides much more information both in the short term to the group manager and in the longer term as a historical record.

You will need to decide which system is most appropriate to your group, but as a general rule the 'check boxes with space for comments' is probably the best compromise allowing a quick tick when there is normal compliance, but incorporating further information in the form of comments whenever this is useful. An outline pre-entry inspection checklist can be found in Appendix 1.

If the pre-entry inspection shows that there are areas where the forest being checked does NOT meet the requirements of the standard, then the applicant must be informed what these 'non-compliances' are and that they must be addressed before membership will be granted.

This can be done through the 'Corrective Action Request' system described in Section 3.7.3, but often at this stage group managers prefer to keep it simple and just inform the applicant of the issues verbally or by sending them a letter.

The applicant then needs to address all of the issues raised so that their forest management complies in full with the requirements of the group and the standard. Once this has been done, the group manager or person responsible for the pre-entry inspection should be contacted by the applicant in order to see if the actions taken are sufficient.

If the issues are relatively minor, or relate to documentation, this might be done from the group's office. If they are more major or relate to management in the forest, then it will probably involve visiting the member for a second time. It is important to make it clear in the information provided to applicants that this may be necessary.

When all the outstanding issues have been checked to confirm that they have been addressed, the outcome must be documented. This can be done on the pre-entry checklist, through a Corrective Action Request process (see 3.7) or through some other system. This should be kept for filing in the membership file.

Once the pre-entry inspection has been completed, including any issues being resolved, and the group manager is satisfied that the applicant member meets all group requirements then the applicant can finally be accepted into the group.

It is important that this decision is formally documented, communicated to the applicant and recorded in the membership file. There are a number of ways this can be done, for example:

- the group manager signs and dates the pre-entry checklist to confirm that the new member has been accepted. This is filed in the membership file and a letter is sent to the new member;
- if the applicant has already signed a membership application then this is countersigned and dated by the group manager to confirm acceptance as a member, a copy put in the membership file and a copy sent to the new member;
- a letter, signed by the group manager, is sent to the applicant, confirming acceptance as a group member and a copy put on the membership file.

If no membership papers have been signed up to this point (see 3.5.1.2 b) then the applicant must now sign them before being formally accepted.

3.5.1.4 Administration for new members

Finally, the group manager needs to ensure that all necessary administration for the new member is completed. This should include:

- opening a membership file which includes application documentation, pre-entry checklist, confirmation of acceptance as a group member and any relevant correspondence;
- adding the new member to the list of members which must be communicated to the certification body regularly;
- adding the new member to the monitoring plan to ensure they will be included in regular monitoring visits (see Section 3.7);
- adding the new member to any mailing list or information list used to communicate with group members;
- if appropriate invoicing the new member for their entry fees or any other fee charged by the group;
- if appropriate, informing other group members about the new addition to the group.

3.5.2 Leaving the group

One of the main features of sustainable forest management is that it is long-term. Certification requires forest management to meet the standard throughout the cycle of growing and harvesting. Therefore, certification bodies will expect group members to join groups on a permanent basis and not just for a brief period when they are harvesting and selling timber. Any group scheme where members regularly leave the group as soon as they have sold their products will have a high risk of losing its certificate. So group managers need to be sure that their members are committed to belonging to the group and managing their forests in accordance with the standard in the long term.

However, there are always situations where a particular member needs to leave the group for a particular reason. For example, an area of forest may be sold or subject to a compulsory purchase order for development of national infrastructure such as roads. Therefore, it is important to have a set of rules specifying when and how members can leave the scheme. These need to be clearly set out in the documents provided with the application form.

It is probably a good idea to begin by stressing that members should only be joining the scheme on the basis that they will not leave except under specific circumstances. Then summarise the conditions under which leaving is acceptable, which the applicant is agreeing to by becoming a member. Finally, set out the procedure that the member must follow if he or she should have to leave the group.

- a. Circumstances where leaving is allowed - below are the type of circumstances under which members might be permitted to leave the group:
 - sale of the forest – when someone is forced to sell their forest, particularly a small-scale owner, it may be impossible for them to stipulate continuing membership of a group scheme. However, managers setting up schemes aimed at commercial forest managers may consider including a requirement that continued membership of the group certification scheme is made a requirement of any sale.

- compulsory purchase of the forest – occasionally forest owners are forced to sell an area of land, usually to government, as part of an infrastructure project such as building a new road. In such cases membership of the group is clearly no longer tenable.
 - lack of sale of any certified products – it sometimes occurs that an anticipated market for certified products does not materialise and therefore after some years no certified material has been sold. In such cases, forest managers may be committed to continue with good forest management but no longer feel able to justify the expense of membership of a certified group scheme.
 - fire, hurricane or other natural disaster – forest areas are occasionally subject to natural disasters such as fire, damage by high winds, flooding or earthquake. Particularly for small forest owners the effects of this may be devastating and it may not be possible to have continuity of management. Again, with larger commercial managers there will be more of an expectation that there are contingency plans in place to deal with this type of situation.
 - other situations – there may be other situations particularly relevant to your group which should be included. It is important to be clear what these reasons are so that the certification body can assess whether or not they are adequate.
- b. Formal notification - the member must inform the group manager in writing that they are leaving the group and why this is necessary. This is important to ensure that the group manager maintains adequate records.
- c. Continued monitoring: there must be a commitment from the member that even if they leave the scheme, they will still allow access to the forest for the certification body or the FSC for up to five years wherever this is possible;

The rules governing leaving the group need to be set out in the membership application form. It is also useful to have a procedure to set out the process which must be followed.

3.5.3 Expulsion from the group

As has already been mentioned, the continued certification of a group scheme depends on all of the members meeting the group policy and requirements. If one member does not meet these requirements and is not prepared or able to take action to meet them, then the group certificate is threatened and it will become necessary to expel the non-conforming member from the group.

Since this can potentially have serious financial and legal consequences, it is important to develop a system in advance which applicant members are informed of and agree to accept as part of their membership (see Section 3.5.1.2).

It is also useful to have a procedure in place which sets out the process to be followed in the event of it being necessary to expel a member. This has two useful purposes:

- it can be given to members to ensure that there is no disagreement about the process being followed;
- it helps to remind and reassure the group manager what the process is since expulsion should be an extremely rare event.

The expulsion procedure must include:

- i. details of the circumstances under which a member can be expelled.
- ii. the way in which the member will be informed of problems prior to expulsion.
- iii. the way in which the member will be informed of the expulsion.
- iv. the period within which the member can make an appeal against the expulsion decision and the way any appeal will be dealt with.

3.5.3.1 Circumstances for expulsion

There are a number of reasons why a member might be expelled from a group:

- A member has been informed that they are not in compliance with group requirements following a monitoring visit (see Section 3.6) and have failed to take action within the agreed time.
- A member has been found to be in gross contravention of group rules (for example, has felled their entire forest area).
- A member has failed to pay group fees despite repeated reminders.

You will need to decide what circumstances are appropriate for your group scheme, but all schemes must include provision for expulsion when members fail to take action to comply with the standard.

3.5.3.2 Informing members of problems prior to expulsion

It is very important that there is a formal system in place to inform members when there are problems so that they have an opportunity to address the problems before the question of expulsion is raised.

The most common way to do this is through written information or official warnings. These should clearly specify what the problem is and how long the member is being given to address the problem.

Again, the exact procedure will depend on your circumstances but in general a reasonable procedure would be a first letter to inform the member of the problem as soon as it is identified, followed by a second, if the problem is not addressed, reminding the member of the urgency of taking action and warning of the possibility of expulsion.

All letters of this type should:

- explain clearly what the problem is,
- give the time within which the problem must be addressed,
- explain how the group manager will check the problem has been addressed,
- suggest that the member contact the group manager (or other appropriate person) to discuss the problem if they need to,
- be clearly dated and signed,
- have a copy kept on the membership file.

If it is inappropriate in your group to communicate with members in writing, then someone will need to visit the member and explain what is happening. Again, the fact the visit took place and a summary of what was discussed should be documented and kept in the member's file.

3.5.3.3 Informing group members of expulsion

If issues raised remain unaddressed, or the member has violated group rules irreversibly, then the full expulsion process must begin.

All communication about expulsion should be very formal. If you are able to communicate in writing with members then a letter should be sent informing the member that the expulsion process has now begun. The letter should be accompanied by a copy of the expulsion procedure or a reminder that the procedure exists if member already has a copy. The letter should also remind the member of the following key points:

- They can no longer claim that their forest is certified, nor sell any products as certified.
- They have the right to appeal against the decision and have a specific period in which to do this (see below).

A copy of the letter must be kept in the member's file. If appropriate, other group members should be informed of the expulsion.

Where communication within the group is verbal, then the expulsion must be carried out through a visit to the member. It may be a good idea to have two people make the visit to provide each other with support since this can be a difficult task.

Again, if verbal communication is used, it is still very important to make a record of the meeting summarising what was said and keep this in the member's file.

If no appeal is received within the maximum period, a letter should be sent to confirm that the member has been expelled.

3.5.3.4 Appealing against expulsion

There must be a process in place to allow members to appeal against a decision to expel them. There are two important aspects to this – timing and process.

It is important that time limits are attached to all stages of the appeals process so it is clear for both the member and the group manager what will happen when. All these times must be clearly set out in the expulsion procedure. Key times are:

- A defined time within which the intention to appeal must be lodged. This is usually about one month but can be longer or shorter. Probably a minimum which is reasonable would be one week.
- A defined time in which the appeals process will be set in motion. The timing on this will depend on who deals with appeals for your scheme. However, the quicker the better since this is likely to be an uncomfortable period for everyone concerned.
- A maximum time from the point the appeals process begins to the point a decision is reached. Again, this will depend on the organisation dealing with appeals but it should be as short as possible.

The process followed to deal with appeals must be clear, fair and as transparent as possible. One of the most common and effective ways to handle appeals is through an Appeals Committee or Appeals Panel.

The people making up the appeals committee will vary depending on the type of organisation running the group and the approach the group has decided to use. However, to ensure impartiality, the appeals committee must be made up of people who are not involved in the day-to-day running of the group, and so have had no involvement in the decision to expel the member.

Some examples of the people who might be used to form an appeals committee are suggested below:

- Where the group manager is part of a larger organisation such as a large company, a big association, a community group or an NGO it may be possible to use people from within the organisation who are not directly involved with the group scheme to form an appeals committee.
- The committee can be made up of other group members, either selected randomly or (more commonly) elected by the group membership.
- Some groups have an appeals committee composed of external people specially invited to be on the committee. Such people might include local community leaders, the local priest or teacher, staff from a university, a lawyer or any other appropriate person. The only stipulation is that they must be independent of the group scheme.
- Sometimes professional forestry associations offer this type of committee as a service to members.

In some cases it may be appropriate to have a mixture – for example a committee with one representative of the company which runs the group, one lawyer and two elected members from the scheme. This ensures that all interested parties are involved in the decision, as well as including specialist input.

As well as deciding who will be represented, you will need to decide how many people should be on the committee. Usually there should be at least 3 to ensure that two people must agree before a decision is reached. It is also usual not to have many more than 5 people since the additional costs and bureaucracy associated with the increased numbers is not justified by improved performance.

You will need to find the most appropriate approach for your group and make sure it is clearly described in the membership documentation so all applicants know what the procedure will be and agree to abide by it as part of becoming members of the group.

The make-up of the appeals committee for each of the three model groups can be found in Box 5.

<p>Box 5: Appeals committees for the three model groups</p>

<p>Model Group 1</p>

<p>The appeals committee is made up of three people:</p>
--

- | |
|--|
| <ul style="list-style-type: none"> • the head of the NGO which is funding the group scheme. • the local priest. • a senior forester from a large local forestry company to provide technical input. |
|--|

<p>Model Group 2</p>

<p>The group has decided to use the services of the National Association of Professional Foresters (NAPF) and has signed an agreement with them, a copy of which is provided to each group member. The NAPF committee is made up of two members of the association together with the current chairperson.</p>

<p>Model Group 3</p>

<p>The appeals committee is made up of five people:</p>

- | |
|---|
| <ul style="list-style-type: none"> • Two senior staff from the association which runs the group. • Three elected members of the group scheme. |
|---|

An example of a procedure for expulsion from a group can be found in Appendix 1.

3.6 Consultation and Complaints

3.6.1 Consultation

One of the requirements of the FSC is that certified organisations consult with local communities and other interested parties (stakeholders), both as part of their forest management and as part of the certification process.

3.6.1.1 Consultation as part of management

The idea that consultation is an important part of good forest management is a relatively new one and some forest managers find it quite difficult. However, experience has shown that consultation almost always has positive results in terms of improved relationships with neighbours and local communities.

There is a wide variety of ways that consultation can be undertaken. At one end of the scale is a very formal process involving meetings, consultative committees and documented proceedings, while at the other is a simple chat between a forest manager and a neighbour over a fence or in the local bar. The appropriate level of consultation for your group and its members will depend on the size of the group, the size and importance of members' forests and the socio-economic context in which your group is working.

There are a number of specific requirements which the FSC standard has with relation to consultation and provision of public information. In particular:

- ongoing consultation and interaction with interested parties,
- public availability of a summary of the management plan,
- public availability of a summary of monitoring data at least once every 5 years.

There are also two levels of consultation to be considered:

- consultation by the group manager,
- consultation by members.

In general, the group manager should be involved in higher level consultation with local, regional or even national stakeholders while individual members should focus on consultation with their immediate neighbours.

The group manager is likely to be involved in discussions of policy and general principles, while individual members are more appropriately involved in discussions about specific management issues in their individual forests.

There are a range of levels of consultation:

- a. Consultation with immediate neighbours - in almost all situations, it is important for forest owners and managers to maintain a dialogue with their immediate neighbours, in particular those who might be directly affected by any operations either because they live nearby or because they own adjacent forest. This type of consultation can be informal if it is working successfully. However, if it is not working then it may be necessary to formalise it to some extent, for example by making it a group requirement that the forest manager must:
 - identify and list or map the 'immediate neighbours' consisting of those either living or owning land adjacent to the forest;

- inform these neighbours in advance about any major operation through a visit, a letter or another suitable means (for example, if the forest is adjacent to a larger community and widely used by people, a signpost at the entrance might be more appropriate).
- b. Consultation with representatives of local communities and interested parties - for medium and larger forests, or for group managers it is often appropriate to maintain consultation with a range of groups. Records of such consultation such as minutes of meetings and correspondence should be kept and filed.

It is very important that when issues are raised by third parties as a result of consultation, that the forest manager or group manager responds and that a record of the response is maintained. The FSC standard is very clear in requiring forest managers to respond constructively to third parties.

3.6.1.2 Consultation required for certification

The main requirement for certification itself is that the group makes its intention to seek certification public. This will also be done by the certification body who will carry out their own consultation process (see Section 6.1.4), but consultation by the certification body is not a substitute for consultation by the group management and members.

The way you choose to notify stakeholders of your intention to seek certification will depend both on the type of group you run and on the level of on-going interaction you have with stakeholders.

Some of the ways group managers communicate their intention to certify are:

- send letters to all the groups with which they are in contact,
- put an advert in a local newspaper,
- put a sign up on a community notice board,
- announce it at a public meeting.

In addition to finding a method of announcing the plan to seek certification, group managers also need to find a way to provide up-to-date information on the current membership of the group.

Members of the group may also want to inform their neighbours or local communities about the plan for certification or, if they join a group which is already certified, then their plan to join the group. They must do this if the consultation carried out by the group management does not include provision of information at such a local level.

3.6.2 Complaints

The standard requires an 'appropriate mechanism' for resolving complaints and grievances. Therefore, all group schemes must have a system for dealing with complaints efficiently and constructively.

There may be two types of complaints:

- Complaints by group members or stakeholders about the group management and the way the group is run.
- Complaints by stakeholders about group members and the way their forest is managed.

Whichever type of complaint it is, as soon as it is received it must be recorded and allocated to a person who is then responsible for ensuring that it is addressed. There should be a central register for all complaints which clearly show when they were

received, who was made responsible for dealing with them, when the complaint was resolved and where the full information on the complaint can be found.

Some group managers choose to keep all documents relating to a complaint in a central complaints file. Others find it better to keep complaints relating to particular members in the membership file.

An example of a complaints register can be found in Appendix 1.

It is a good idea to have a standard letter which summarises the complaints procedure which can be sent to any person who makes a complaint which sets out:

- how the complaint will be dealt with,
- who is responsible for dealing with it,
- what the timeframe is likely to be for getting a response,
- what further action is possible if the response is not satisfactory.

3.7 Monitoring group members

One of the most important jobs of the group manager is to ensure that the forest management of all group members is regularly monitored to check that it continues to meet the requirements of the group and the standard.

Therefore, setting up and running a monitoring programme will be one of the main tasks of the group management. This will include:

- developing a monitoring programme,
- developing a monitoring checklist,
- setting up a reporting and feedback mechanism (corrective action requests),
- developing a sampling strategy where appropriate,
- ensuring good record keeping.

3.7.1 Setting up a monitoring schedule

When starting to set up a monitoring schedule the first two questions to ask are: 'Who will carry out monitoring?' and 'When will it be done?'.

3.7.1.1 The monitoring team

Monitoring can be carried out by a number of different people:

- The group manager him or herself. This is common in small groups, but in larger groups the manager may no longer have time to adequately monitor all members,
- A member of staff specifically in charge of monitoring. This works well in larger 'group management' organisations since one or more staff are able to focus all or part of their time on planning and implementing a systematic monitoring programme.
- An external consultant hired to carry out monitoring. Some group managers do not have the time or staff to carry out monitoring themselves and instead use one or more external consultants who they train to carry out the monitoring work for them. In such cases it is often sensible for the manager to accompany the consultant on a few visits, randomly selected, to check the work they are doing.
- Members of the group who monitor each other. All of the above monitoring strategies have costs associated with them. Therefore, some group schemes have

adopted a different approach where group members monitor each other. This has some advantages since it allows members to meet each other and exchange information. However, it is important to ensure that problems are properly reported since the member being inspected may put pressure on the member carrying out the monitoring visit 'not to notice' when things are wrong. Sometimes it works better if each monitoring visit is carried out by two members so that they can support each other.

Whoever you decide to use, it is very important that they are as independent as possible of the member they will monitor to try to ensure an objective view. It is also very important that they are trained in how to do the required monitoring. This is discussed further in Section 3.9.

3.7.1.2 Monitoring timetable or schedule

Once the monitoring team have been identified, it is important to develop a monitoring timetable. For most groups the aim of monitoring should be to ensure that every member is visited at least once per year. There will be some exceptions to this (eg groups with very large numbers of very small ownerships) in which case sampling may be used. Sampling is discussed in Section 3.7.4.

It is important that a particular person within the group management has responsibility for planning the monitoring timetable and ensuring that monitoring is carried out as planned.

It is a good idea to plan in advance approximately when each visit will be made. This is often done initially by planning which members will be visited in each month or each quarter. This will give an idea of the approximate number of days which will be required to carry out the monitoring in each period. This information should be discussed with the personnel responsible for monitoring to ensure that they have adequate resources to carry out the planned monitoring.

If you have a group which is spread out over a large area, it is a good idea to plan monitoring so that, whenever possible, all the members to be visited in one region are visited at the same time to reduce travelling time and make the monitoring process more efficient.

Nearer the time, the schedule can be made more detailed and members informed about the date of the planned visit. This should not be done too long in advance – it is normal not to give more than 2-3 weeks warning so that the member doesn't have too long to prepare for the visit.

3.7.2 The Monitoring Checklist

The purpose of the monitoring visit is to check that the member is continuing to meet all of the group requirements. This involves looking both at any specific issues relating to previous visits, stakeholder input or information from the member, and at the group requirements in general to ensure they are being followed.

There are a number of different ways of documenting the implementation and findings of a monitoring visit but, as with the pre-entry inspection, the most effective method is usually the use of a checklist.

This should list all the aspects of the member's management which must be checked during the visit and have space for the comments or findings of the person doing the monitoring. Thus it serves as a planning tool, an *aide memoire* during the visit, and a record that the visit was carried out.

The exact content of the monitoring checklist will depend on the way the group manager has interpreted the standard into group requirements (see Section 3.4 above). However, it will probably have many similarities to the pre-entry checklist (see Section 3.5.1) and the basic content should include the following:

- a. Administrative information including the name of the member and the name/location of the forest, the person carrying out the monitoring visit and the date the monitoring visit was carried out.
- b. Specific information from the previous visit which needs to be followed up. If any problems were raised in previous visits (see Corrective Action Requests below) and actions taken to address them need to be checked, a note should be made to remind the person carrying out the monitoring visit.
- c. Any changes which the member has reported and need to be checked. For example operations carried out, new planting, clearing.
- d. Group requirements. Finally, the checklist should include the group requirements so that the person carrying out the monitoring can check that they continue to be met.

3.7.3 Corrective Action Requests (CARs)

During a monitoring visit, if it is found that the member being inspected is not complying with the group requirements, then there must be a system in place to inform them of the non-compliance, require that appropriate action is taken and ensure that the action is taken and the problem resolved. The most common way of doing this is through a Corrective Action Request (CAR) process. Other names are also used, but the system usually contains the same basic elements:

- a formal process for recording and communicating that a problem has been identified and must be addressed – a CAR form,
- a system within the group management structure for recording all CARs raised and reviewing progress to ensure that they are resolved within an agreed timeframe,
- a process for confirming that the problem has been resolved – ‘closing out’ the CAR.

3.7.3.1 Raising a CAR

Whenever a problem is identified during a monitoring visit where a member does not meet the requirements of the group scheme, and therefore the standard, a corrective action request (CAR) must be raised.

A corrective action request, as its name implies, is a formal request to the member to take action to resolve a problem which has been identified. This is usually done using a standard format called a Corrective Action Request Form (or CAR form).

The sections usually included in a CAR form are shown in Box 6. A sample CAR form can be found in Appendix 1.

Each problem must be reported on a separate CAR form. At the end of the monitoring visit all the CARs which have been raised must be discussed with the member to make sure that they understand exactly what the problem is and, if possible, already have some idea about how they will address the problem. Some CAR forms have space for the member to sign the form to confirm that they have understood the issue raised.

It is also very important to agree a timeframe within which the problem identified in the CAR will be addressed. The time may vary but a general rule is that the more serious the problem, the less time is allowed. So if there is clear non-compliance with the

standard, then it is usual to allow only a short period such as 4 or 6 weeks for action to be taken. If the problem is less serious, then more time can be allowed. In some cases it may be appropriate to allow 6 months or a year, particularly where forests are seasonal and no action can be taken until the next season.

When you are deciding on the timings for close-outs of CARs it is a good idea to bear in mind the CAR system which the certification body will use. This is described in Section 6.1.5. In particular, any problem a member has which might result in a Major CAR from your certification body needs to be addressed as quickly as possible.

If it is possible to make a copy of the CAR while still with the member, then leave a copy with them. If it is not possible then send them a copy as soon as possible after returning to the office.

It is quite common to require members to respond to CARs within a defined timeframe (usually 1 – 2 weeks) with details of how they intend to resolve the problem. This serves two very useful purposes:

- firstly, it ensures that the member has to think about the problem and what he or she is going to do to address it,
- secondly, it allows the group manager to check that the proposed action appears to be adequate to address the problem identified. If it is not adequate, then this can be communicated to the member before a lot of time and effort has been wasted.

<p>Box 6: Information which should be included in a Corrective Action Request form</p>

<p>Section 1 – Identification of the problem</p>

- | |
|---|
| <ul style="list-style-type: none"> • The name of the group member, • The date, • The number of the CAR, • The person who identified the problem, • Details of what the problem is, • The date by which it must be resolved, • It may also be helpful to note what action is to be taken to close out the CAR if this is agreed during the monitoring visit, • It may also be helpful for the person doing the monitoring and the group member being monitored to sign the form. |
|---|

<p>Section 2 – Verification that the problem has been resolved</p>

- | |
|---|
| <ul style="list-style-type: none"> • Details of the action taken to resolve the problem (close-out details), • The name of the person who checked the close-out action, • The date this was checked. |
|---|

3.7.3.2 A central register of current CARs

Once a corrective action request has been raised, it is important that the group manager ensures that it is followed up, that action is taken to resolve the problem and that this action is checked. The best way to systematically ensure that CARs are followed up is by having a central register of CARs. This records basic details

(member's name, CAR number, date raised, date due for close out), and must be regularly reviewed and updated to ensure that all CARs are being closed out on time.

The register can be in whichever form is more convenient for your group. For example, it could be:

- a book in which all new CARs are written and notes made when action has been taken to resolve the problem, or
- a computer table or spreadsheet which can be sorted and analysed, or
- a file in which a copy of each outstanding CAR is kept in order of the date when the 'close-out' is due (a copy of the CAR must also be kept in the member's file for reference). Then you can check the master file regularly to see which CARs need to be followed up.

An example of a CAR register can be found in Appendix 1.

It is important that a designated person has responsibility for regularly checking the CAR register to see if any CARs need to be followed up, and the close-out details checked.

3.7.3.3 Close-out of CARs

When the member informs the group manager that the required action has been taken, or the time limit on the CAR has been reached, then someone must check whether the problem has been adequately resolved. This person is usually the same one who carried out the original monitoring visit.

It is sometimes possible to review the action taken to address a CAR from the group manager's office if it related to documentation. For example, if the CAR was raised because the member had not completed a conservation plan, then a copy of the complete plan could be sent to the group manager or person responsible for monitoring.

Other CARs require a visit to the member to confirm that adequate action has been taken. For example, if a CAR was raised because the member had allowed exotic plantation species to spread into the riparian zone of a river, then a visit would be needed to confirm their removal.

The need for a follow-up visit can sometimes cause difficulties for groups whose members are very remote or which have very limited resources, where the expense of an additional visit may be a serious problem. In such cases it is not acceptable to do nothing, but it may be possible to find reasonable alternatives to a visit. For example the group manager could request adjacent members to make a visit, use photographs or get copies of contracts or payments for carrying out work required. Based on this, the CAR might be closed-out, but with a note to double-check at the next annual monitoring visit.

This approach will be quite acceptable in many cases, but there will be exceptions when a very serious issue such as illegal felling, serious pollution or safety problems are identified in which case the person responsible for monitoring may feel it is necessary to make the visit themselves whatever the cost and difficulty.

3.7.3.4 Failure to close-out a CAR

If a member fails to close out a CAR in the agreed timeframe this is extremely serious as it raises the risk of the group no longer meeting the requirements of the standard. Therefore, there must be a formal procedure to deal with the situation immediately. In general, this begins with a letter from the group manager to inform the member that

unless they have taken the required action within a fixed time (usually very short eg 2 weeks) that the formal expulsion procedure will begin.

If the member still takes no action, and does not provide an explanation, then the expulsion procedure (Section 3.5.3) must begin.

If the member responds with an explanation of why the problem has not been addressed, the group manager will have to make a decision as to whether:

- a. The explanation is sufficiently reasonable that the member should be given more time. In this case, remember that a certification body will scrutinise such decisions carefully.
- b. Despite the explanation, the expulsion procedure must still be followed immediately.

3.7.4 Sampling

Generally, most certifiers encourage group managers to monitor every group member on at least an annual basis. However, in some groups it is either not necessary or not feasible to visit every member every year. Examples of such groups are:

- Groups with very large numbers of very small forest units where a high proportion do not have any operation occurring in them in any specific year making a monitoring visit rather pointless.
- Groups where a single organisation carries out all the operations for a number of members making it possible to check the work done without visiting every member.

In such cases sampling may be used to select a proportion of members to be visited.

Sampling is the process of selecting a subset of members who will be visited in a particular year in such a way that it gives a good statistical probability that any problems which exist in the group as a whole will be identified (see Box 7 for further details).

However, there is a very important point to remember. The basis of sampling is that:

it must be assumed that any problem identified in a member within the sample also exists in members not included in the sample.

As a result, it is very important that there is a system in place to ensure that:

- i. any CARs raised are communicated to ALL group members,
- ii. all group members check to see if they have the same problem,
- iii. any group member with the same problem takes appropriate action.

This is very different from a group scheme where all members are visited and where CARs raised relate to a specific member. If you use sampling then all CARs must be communicated to all group members and all members must check whether they have the same problem,

If you are planning to use sampling in the monitoring programme for your scheme, it is probably a good idea to talk to your certifier about it as early as possible to check that whatever you plan to do is adequate.

Box 7: Selecting a random sample
The theory about sampling is that if you take a random sample of members and visit them, this provides you with information which can be applied to the whole group. The accuracy of the information, and in particular whether existing problems will be

identified, will depend on:

- The size of the sample. The higher the percentage of members included, the more likely it is that any members with problems will be included in the sample.
- The amount of variation between members. If the members are all very similar, and are therefore likely to have similar problems, then fewer visits should be needed before the problems are spotted since several members will have the same problem and only one needs to be visited for it to be identified. However, if the membership is very variable and different members may be subject to different problems, then more visits will be needed to ensure that all the problems are identified.

If you decide to use sampling, you will need to think about the size of sample needed based on the variation between group members.

How the members to be visited are selected is also very important. The selection should, wherever possible, be **random** since this gives a good statistical basis to your monitoring.

Random samples: The easiest way to get a random sample of group members is as follows. Write the name of each member on a separate piece of paper, fold each one in half, put all the pieces of paper into a bag and get someone to take them out one at a time without looking until the right number of members to visit has been selected. This method, though very simple, is still often used by auditors and is perfectly acceptable.

A slightly more sophisticated way to achieve the same result, particularly for large groups, is to assign each member a number and then:

- *either* put all the numbers on paper in a bag and select as described above,
- *or* use a random number generator (available on most pocket calculators and computers) to give a list of random numbers and select the corresponding members.

Stratified random sampling. This is used when a completely random sample would be inappropriate and some decisions need to be made in advance about the members to be visited.

For example, if a manager has 30 members and plans to visit 10, he may decide that not more than 2 who were visited last year should be visited again. In this case, the same random method of selection described above should be used and the first two members selected who were visited last year are included in the sample. However, if any more members visited last year are selected then they must be rejected and the selection process continue until 8 members not visited last year are chosen. This can also be used to ensure a range of sizes or locations are visited.

Non-random sampling: There are also circumstances when some choices should be made on a non-random basis. There are likely to be a number of circumstances under which the group manager will automatically include a particular member in the annual monitoring plan. This will vary from scheme to scheme, but some examples are given below:

- if the manager has received a complaint from a stakeholder about a particular member,
- if the member has CARs which are due to be closed out,
- if the member has carried out particular operations within the last year (eg new management plan, harvesting, road building etc),

- if the member is new,
- if the member has not been visited for a number of years.

Some non-random sampling is perfectly acceptable, but it is important to remember that non-random samples do not give a good statistical probability of an accurate overall picture of the group members.

3.8 Group system documents and records

An important, if not always popular, task of the group manager is to manage the internal documents of the group scheme and to maintain proper records on all the members. Responsibility for this task should be very clear within the management structure. Sometimes it is assigned to the administrative staff, while in other groups it is assigned to technical staff. In groups with larger management organisations the responsibility for different aspects of document and record control is likely to be with different people.

3.8.1 Group System Documents

As you develop your group scheme you will probably find that you have quite a few different documents such as:

- application form for members,
- information on the group scheme,
- membership requirements,
- rules for joining, leaving and expulsion,
- checklists for the pre-entry inspection and monitoring,
- CAR forms and a central register.

In addition, you may have procedures for some of the things you do such as:

- monitoring,
- expelling a member from the group,
- dealing with CARs.

All of these documents together make up the group system documentation and it is very important that they are properly managed. This is best done by following a few simple rules of document management which are described below.

3.8.1.1 Only use up to date documents

Documents are rarely static and most are edited and improved from time to time, particularly in the early days of a group scheme when there is a steep learning curve. Therefore, it is very important to have a system which ensures that you know which is the current version of the document and that only the current version is used.

- a. Each document should be given a reference number, issue number and dated. Any time the document is updated, the issue number should be amended and the date changed.
- b. A central list of all documents, their current issue number and the date of issue should be maintained, together with a recipient list which includes all the people who use the documents and must be informed if a change is made.

- c. When a document is updated, the previous version should be transferred to an archive file (whether it is a hard copy or an electronic version) and the new version issued to everyone on the recipient list so only the current version of the document is available for use.

By doing this it will be easy to check that only current versions of the document are used.

3.8.1.2 Make sure that documents are useful

The two biggest mistakes people make with system documentation is to have too much documentation or too little documentation. Both cause problems so it is important that you think through for your own group scheme what are the necessary documents.

It is also extremely important that the documents are useful. Some of the common mistakes people make are:

- To write procedures in very formal and complicated language which they feel makes the procedure sound more official, but in fact just makes it intimidating and confusing for those who have to use it. See Box 8 for more information on writing useful procedures.
- To produce documentation without sufficient discussion with the people who will be using the documents. It is very important that documents are useful and appropriate.
- To fail to change documents to reflect changing needs or practices within the group.

3.8.1.3 Define who can change documents

In larger organisations there are sometimes problems because some individuals decide to make changes to system documents that they use, but the changes are not general so that several versions of the same document exist.

It is important to encourage people to suggest changes and improvements to documents as highlighted above, but it is also critical that this process is managed.

- a. Have one person who has responsibility for issuing new versions of a document.
- b. Ensure that all personnel understand that they must continue to use the official current version until the new version is issued.
- c. Try to have a clear procedure to be followed by anyone wanting to make changes to documents.
- d. Try to ensure that important revisions are done in an efficient and timely manner to reduce the temptation for individuals to make their own changes or to stop using the official document.

Box 8: Procedures

Procedures are documents which set out how a particular task should be carried out. There are a number of parts to a group scheme where a procedure is likely to be useful in defining what will be done. In particular:

- Joining the group,
- Leaving and being expelled from the group,
- Carrying out a pre-entry inspection,

- Carrying out monitoring,
- Corrective Action Requests,
- Complaints,
- Appeals,
- Document control and administration.

These procedures can serve two purposes: firstly, they remind members of the group management what they are supposed to do, and provide consistency between different people carrying out the same activity. Secondly they inform members of how things are done and, in the case of procedures such as complaints and appeals, provide information on what the member should do.

When writing procedures it is important that they are precise and sufficiently detailed to provide good guidance. But this does not mean that they need to be in very formal or complicated language. The purpose of the procedure is to document clearly and accurately the process that must be followed, together with details of what to do in any particular circumstances.

- a. Use clear simple language.
- b. Ensure that the procedure reflects exactly what you intend to do or are doing in practice. If you need to change what you do, change the procedure too. Never continue to do something that doesn't work 'because it is in the procedure' – change the procedure.
- c. Always give procedures a name, issue number, date of issue and, if appropriate, the name of the person authorising the current version.
- d. Ensure that everyone who is likely to need it has access to the current version of the procedure.
- e. Ensure that everyone necessary is trained in using the procedure and informed when any changes are made.

3.8.2 Records

Records are all the information which you collect in the group scheme, for example:

- CAR forms and the CAR register,
- completed pre-entry and monitoring checklists,
- membership lists,
- important correspondence.

You should decide how long you are going to keep each type of record. It should probably be at least 5 years for most of them, since that is the lifetime of a certificate. Some organisations choose to keep records for seven or ten years, and some keep all the records relating to a member as long as that person continues to be a member and then for a fixed time (two years or three years) afterwards. When deciding how long to keep records the main things to consider are:

- For how long will old records continue to be potentially useful or important?
- How much space do you have for storing records properly?
- Are there any legal requirements for keeping records in your country?

The way that the group's records are organised and stored is up to the group manager and a number of different ways can work.

However, most group managers tend to have a file for each member, where all the documents relating to that specific member (such as membership records, monitoring records and CARs) are kept.

In addition to individual records, there must also be a system for managing documents and records relevant to the group scheme as a whole. These include documents such as a master list of members, the CAR register and any communications with the certification body or the FSC.

Some of the more important records, and some considerations for their management are discussed below.

3.8.2.1 Membership records

Records must be kept for each group member and should include all documentation associated with their initial application to join the group, the pre-entry inspection, monitoring, any CARs raised and any important correspondence.

Members' files may also include copies of management plans, maps or other documentation associated with the management of the forest. An example of a contents list for a membership file is given in Box 9.

Box 9: Example of a contents list for a membership file

There are a number of ways of organising membership files. The most simple is to put all documents into one file in date order, but this can be cumbersome when trying to find an important document. Therefore, most group managers have a system which includes two or more sub-files for each member. The approach taken by Model Groups 1 and 3 are outlined below.

Model Group 1: The amount of documentation associated with each member is likely to be very limited as much of the communication will be verbal. Space for filing is limited, money to purchase files is also limited. However, the group manager still wanted to be sure that the group documentation was kept separate from the management documentation for each member. Therefore, he developed a system using two sub-files:

File 1 – Application, pre-entry inspection, monitoring, CARs, sales documentation and general correspondence (if any).

File 2 – Management documentation relating to the forest

Model Group 3: Since members can be quite large, and the volume of documentation substantial, the group manager chose to have five different sub-files for each member, using different colours to avoid confusion.

File 1 (Green)

- Application documents
- Pre-entry inspection checklist and related correspondence
- Details of leaving or expulsion if appropriate

File 2 (Blue)

- Monitoring checklists
- CARs raised and details of close-out

File 3 (Red)

- Copy of management plan
- Maps of forest area
- Other management documentation

File 4 (Yellow)

- General correspondence

File 5 (Orange)

- Financial records

3.8.2.2 List of members and Turnover

A summary of members should also be kept which gives the name of the member, the name, type and location of the forest and the forest area (preferably in hectares) and includes:

- current members and the date they joined,
- members who have left or been expelled and the date it occurred,
- applicants.

In fact, many group managers prefer to have three lists, one for each of the categories above.

The certification body will require this to be regularly updated and will use the information for a number of purposes:

- a. It will be used by the certification body to help plan their surveillance visits;
- b. It will be used to report to the FSC on the area of forest covered by the certificate.
- c. It will be periodically analysed to see how many members are leaving or being expelled and whether the rates indicate a problem. If the number of members leaving or being expelled is high or shows a significant increase, it may be a sign that there is problem with the management of the group and may even threaten the continuation of the certification.

An example of this type of record in the form of a simple table can be seen in Appendix 1. Many group managers, particularly those with large groups, prefer to use a spreadsheet or a database where a range of information can be kept and easily analysed if desired.

3.8.3 Monitoring plans and records

It is very important that all records of planning and implementation of monitoring visits are kept. Annual schedules should be kept and, if appropriate, referred to when planning the next year's visit. This is particularly important if you use sampling since you will need to be sure that sufficient members are visited over a defined period.

The records of the visits themselves are also very important as they provide a record of the on-going performance of the member, as well as providing evidence to the certification body that monitoring is being carried out.

If monitoring visits are carried out by sub-contractors or other members it is essential to ensure that they send all the paperwork to the group office for inclusion in the membership file.

3.8.4 CARs

Corrective Action Requests are the main tool you have for ensuring that the group members all comply with the group requirements. Therefore, it is very important that you have a clear system for recording and storing them.

In general, a copy of the CAR should be kept in the member's file, together with all the information on the close-out. The exception to this is when sampling is being used, in which case any CAR which is raised must be treated as applying to the membership in general. In this case a central register of CARs may be better.

In addition to the CAR form itself, there must be a central register where information on CARs being raised and closed-out is kept. Some managers like to keep a copy of each CAR in the central register. Others do not since they can always be located in the membership file if required.

3.9 Training and Information

Training and the provision of information is a very important part of the management of a group – both training the group management staff and training group members. We will begin by looking at training of group management staff.

3.9.1 Training of group management staff

The 'group manager' can range from a single person to a large organisation with many employees. Whatever the structure there are a number of skills the group manager must have to run a successful group. If the management structure involves a large number of people, it is a good idea to specifically allocate various tasks to different people and ensure that they have the relevant training.

Forest management: it is very important that someone within the group management structure has expertise in forest management. Normally this would be a combination of formal training and practical experience, though in some cases experience alone might be sufficient.

The only exception to this might be small groups with very limited resources where the group is initially set up with input from a forester, but is subsequently run by a local person without this training.

3.9.1.1 Developing a group scheme

This guide aims to provide some of the training required to develop a group scheme but more practical training may also be useful. One possibility is an external course if such a course exists, but in many places they don't. An alternative is to organise for the person (or people) responsible for developing the scheme to visit other existing group managers to see how they set up and run their group. This type of practical training is very useful and usually very effective.

If you want to try to set this up but do not know of other group schemes then contact your certifier, if you have one, or the national FSC working group or even the FSC Secretariat who can provide you with contact details of groups in your region.

3.9.1.2 Initial assessment and monitoring

One of the main tasks you have as a group manager is that of assessing applicants before they join the scheme and carrying out monitoring of members. For this task auditing skills are extremely important.

Most people can learn to be good auditors quite easily, but few people are born good auditors so training is essential.

If you are running a medium or large group then you should definitely consider sending one or more staff on a professional auditing course. There are a range to choose from:

- FSC auditor courses: in some places there may be courses specifically aimed at becoming an internal auditor for the FSC standard.

Currently the FSC does not have a process to officially endorse training courses, but if you contact the FSC Secretariat they are likely to be able to tell you where training is available.

- ISO 9000 and 14001 lead assessor courses: if dedicated FSC courses are not available, a good alternative is to look at lead assessor courses for ISO 14001 or ISO 9000. These two standards are 'management system' standards and though part of the course will be spent learning about the requirements of these standards, there is also a strong focus on auditing techniques and practice which is the important part.

ISO 14001 is an environmental management system standard and so during the course in addition to learning about the standard and how to audit, you will also look at environmental law. ISO 9000 is a quality management system standard and generally more time is spent on auditing techniques since no time is spent on legal requirements.

If your group scheme is too small or too poor to justify a formal training course, ask your certifier if they can provide advice on internal training. Other possibilities are:

- contact other groups and see if someone from your group could get some training from their personnel,
- contact a large forestry company to see if they have internal monitoring and would be prepared to help out,
- develop your own training course.

3.9.2 Training and information for group members

Provision of information and training is often one of the most useful services that a group manager can provide since, in many places, owners and managers of the type of small and medium forests which join group schemes do not have easy access to information.

The amount of training and support which group managers provide for their members varies enormously. Some group managers provide no training or support at all, but merely run a scheme which forest managers can join if they wish to and if they meet the requirements of the group. Other group managers provide complete support for their members helping with inventory, management planning, operations and marketing as well as running the certification scheme. Many groups lie somewhere in between these two extremes.

One of the most basic ways to provide members with information is through a 'Members Handbook', a document containing a variety of information on the group, its requirements and how it works. This is discussed further in section 4.1.

Members' Handbooks work very well in situations where group members are literate and able to understand information presented in a written format. However, many groups include members who are not comfortable with information provided as a written document and alternatives must be found, the most common of which is through verbal training. However, training is not only useful for group members who find written communication difficult, it is a very useful tool in almost all situations.

Some of the most common types of training provided are outlined below:

The group scheme requirements: a training programme in the requirements of the group scheme is very useful. This can be designed as a one-to-one training which can be given by a member of the group management structure to an individual applicant, or as a programme for several people. It can last an hour, half a day, a full day or longer as is appropriate.

It is a good idea to prepare some kind of training material. This might be a set of notes for the trainer, a set of notes for the person being trained, a set of slides to make a presentation with or whatever else is appropriate.

It is also a good idea to do at least one practice run of the training to colleagues, or even alone, before doing it 'for real'. If it is possible to practice in front of colleagues this is probably the best option as they can provide input on whether the information is clear and makes sense, whether everything important has been covered and whether it is all accurate.

3.9.2.1 Legal compliance

In most countries with a good Forest Law, meeting legal requirements will ensure that forest owners meet a large proportion of the standard.

However, it is risky to assume that all forest managers are meeting the law. One of the interesting findings of many of the early group managers has been that small forest managers are often not very familiar with the legal requirements for management of the forest and so may not be implementing them. Therefore, it may be very useful to set up a training programme on legal requirements for forest management. This can then be extended to include updates for members on any changes to the law and how the changes will affect management.

There are a number of ways you can provide this type of training:

- a. Hire in a specialist to design and run the training. In many countries there are lawyers or forestry consultants who specialise in this type of work. The advantage of this approach is that the specialists should have access to all the information, and it will save the group manager a lot of work. In addition, the specialist should have experience in training and so may well do a very effective job. However, this is likely to be a relatively expensive option.

To find them try looking in forestry magazines, or contact the forestry department or a professional foresters association to ask for names.

- b. Hire a specialist to design the training material but run the training internally. This may be a cheaper option if you need to run the training repeatedly for different or new members. It means more work for you, but also makes it more flexible since you can combine the legal requirements with other training, or with visits to members.
- c. Design and run the training internally. This may well be the preferred option for larger group managers who feel that they have the resources to research, prepare and run training in legal requirements. Even some smaller groups may decide to do this if the cost of the previous options is too great.

If you do decide to 'do-it-yourself' then you will need to find good sources of information. In some places organisations run public courses which one of the group management could attend. Forestry associations or professional bodies often provide information and useful summaries of legal requirements, as do many forestry departments. Another option may be to contact a large forestry company and ask them for help.

3.9.2.2 Technical training

Many group managers provide considerable support to their members in implementing good forest management practices. In particular, assistance is often provided with writing management plans, carrying out inventory, planning operations, setting up a monitoring programme, developing a conservation plan and health and safety.

It is important to remember that technical training may not just be needed for group members, but also for contractors carrying out the operations since contractors working in certified forests must meet all the requirements of the standard. The failure of contractors to comply with the requirements of the standard is one of the most common problems encountered by certification bodies.

In some cases the group manager will do most of this work for the members, either as a support service of the group or as paid consultancy. However, the more that each member understands the technical requirements of the standard and how they have to be implemented, the more likely they are to maintain compliance with the standard. Therefore, it may be very useful to provide training to members in technical requirements and encourage them to do the work themselves.

3.9.2.3 Conservation

Often one of the most difficult parts of the standard for small forest owners is the requirement to plan and implement conservation strategies. Providing training in this area can help members to understand why it is important and how to do it, thus making compliance much more likely.

As with training on legal requirements, you will have to decide whether to run the training yourself or whether to bring in an external specialist. This will probably depend on a number of factors including how much internal expertise you have in the group management organisation, how easy it is to find external expertise and how much it will cost.

If you have little internal expertise in forest ecology, wildlife management or conservation then it is probably well worthwhile involving a specialist. You may already have some contacts with conservation organisations or academics. If not try contacting the biology department of your local university (or the zoology, botany or conservation departments if they exist). You could also contact local conservation organisations such as WWF (the Worldwide Fund for Nature), your local bird protection society or any other conservation organisations. It is very likely that one or more of these will be able to help you and some may even be happy to become a partner, providing you with expertise in return for the opportunity to influence your members' conservation strategies.

If you do manage to find someone to work with then remember that they may not know much about certification. If they don't then it is important that you explain what certification is, how it works and, most importantly, that the aim of the training is to ensure that the members meet the requirements of the FSC standard. Otherwise your specialist may end up talking about their idea of ideal forest management as opposed to the type of management required by the standard (see also section 3.4 Interpreting the standard).

3.9.2.4 Interaction with the community

The requirement in the FSC standard to interact with local communities is one which many forest managers find challenging to interpret and implement. Training on ways of interacting and involving local people in an appropriate way can be very helpful.

In particular, training in consultation, resolving grievances and dealing with complaints are all likely to be useful.

If there is expertise within the group management structure then training can be developed and implemented internally. If this expertise is not available, then there are a number of places to look for help. If there are local community projects, they may have people with expertise in this type of training and capacity building. Some universities also specialise in training people in consultation and resolving grievances. Again, ensure that anyone providing training is well briefed on the requirements of the standard so that the information they provide is appropriate and accurate.

4 Supporting and Involving Members

4.1 Producing a members' handbook

A useful tool that many group managers use is a 'members' handbook'. This provides a single document where all the group requirements for membership, monitoring, expulsion and so on can be collected and gives something for members to refer to for information without always needing to contact the group manager.

The 'members' handbook' should be appropriate to the type of member you expect to have. If your members generally find reading difficult or impossible, then it should be short and use pictures – in some circumstances you may decide not to have a written handbook at all and to develop a training session which serves the same purpose.

However, for those group managers who expect to have members who are able to use written material, a members' handbook is a very useful tool for collecting together all the relevant information.

The exact length and content of a Members' Handbook is the decision of the group management. Some may be very brief, containing little more than a collection of the key group requirements. Others are much longer including a variety of information which the group manager feels will be useful for members.

The type of document also varies. Some group managers may decide that they have enough members, and the handbook will stay the same long enough to justify having it professionally printed in a pamphlet or book format. For many groups, though, that is much too expensive and the handbook is printed out in the group management office on ordinary paper which is kept in a file. This latter approach has the advantage that if each section is numbered and dated then it is possible to update and replace some parts of the Members' Handbook without having to replace the whole thing.

It is quite likely that the Members' Handbook will require revision periodically. It may also start as a relatively short document and then grow over time as the group manager or members find more and more useful information to add to it.

A suggested content for a handbook is shown in Box 10.

Box 10: Possible Contents of a Members' Handbook
<p>The items suggested below are for guidance only – each group manager will need to decide what information is most appropriate for the group they manage. However, since it is a requirement of certification that members are provided with information on both the scheme and how it runs, and the certification process and its requirements, the handbook should normally contain, as a minimum, the information listed under 1 and 2 below.</p> <p>1. The handbook is a useful place to collect together all the information on the</p>

group and its requirements

- Rules for joining, leaving and expulsion from the group
 - Group policy and requirements for forest management
 - Details of the initial assessment (the checklist used is sometimes provided to allow applicants to carry out a 'self-assessment' and check if they are meeting all the group requirements before the group manager comes to do the official assessment).
 - Details of the group monitoring programme including Corrective Action Requests and what to do about them
 - Complaints procedure to be followed if the member has a grievance against the group manager.
 - Contact details for group management and other useful organisations such as forest department, environment department or local university
 - Costs of joining and staying in the group and charges made for any services provided by the group manager
 - Rules for making claims associated with being certified.
2. The handbook should also include information on the certification process and the requirements for certification
 - The certification process, including the use of sampling so members understand why only some are visited by the certifier.
 - The requirement to allow the certifier or the FSC access to the forest at any time.
 3. The handbook can also include more practical guidance on meeting the group policy and requirements for forest management.
 - Developing and maintaining management plans
 - Developing and implementing a conservation strategy
 - Consultation with stakeholders and dealing with complaints
 - Maintaining a forest inventory
 4. The handbook can summarise or list the laws, codes of practice and guidelines which the member must comply with
 - Laws applying to forestry (either a list or a short summary of the main requirements of each law)
 - Important codes of practice and guidelines and how to obtain them
 5. Chain of custody and use of the FSC name and logo can be included:
 - A summary of the rules for internal chain of custody
 - Clear guidance on group rules for members selling timber individually as certified.
 - Rules on the use of the FSC name and making claims.
 - If members have access to the FSC logo, rules on the use of the FSC logo
 6. Some group managers also have preferred contractors for carrying out operations. These contractors have usually been trained or tested to ensure

that their work meets the standard required by the group.

- Details of preferred contractors including name, contact address or telephone number, operations carried out and prices.
- Details of any discounts available for group members

4.2 The Members' Committee

Several groups have found it very useful to have some form of Members' Committee. The structure and functions of such a committee vary but some ideas are discussed below.

The main function of the committee is usually to ensure good communication between the group management and the group members and can help to empower members. This is particularly important in large groups, especially those which several areas or regions where an individual member and the group manager can be separated by several layers of the group organisation.

4.2.1 Structure of the members' committee

In general, the committee should include:

- representatives of the membership, usually selected by election, though other techniques may sometimes be more appropriate,
- representatives of the group management organisation, usually with specific functions or expertise,
- the group manager.

The committee should elect a chairperson. It is probably better if it is a member rather than the group management since this will ensure that members do not feel that the committee is just a tool of the group manager. However, it may be appropriate for the group management to supply the secretary of the group who takes notes and carries out any administration required.

4.2.2 Functions of the members' committee

It will initially be the job of the group manager to define the functions of the members' committee as part of the group scheme. However, once the committee is up and running it may be a good idea to let it redefine its own functions in line with the needs of the membership.

The type of functions the committee might begin with are:

- raising specific issues or concerns from members
- discussing members' needs and requirements with the group management,
- reviewing the management of the group including the monitoring programme and the certification audits and surveillances,
- reviewing changes to the FSC requirements and deciding how the group should implement them,
- feeding back information from the group management to members,
- planning and helping to carry out training.

The committee might (or might not) also be involved with applications and vetting of new members, expulsions, reviewing CARs, dealing with complaints and hearing appeals.

5 Chain of custody

5.1 What is chain of custody

Chain of custody is the process of tracing certified wood from the forest to the final product.

When a tree is felled in a certified forest it is sold and may then go through a whole range of manufacturing processes before it becomes a final product. At each stage in the process, it is important to verify that any wood being classified as 'certified' really did originate in an FSC-certified forest.

This process starts from the moment the tree is felled and the group is responsible for ensuring an adequate chain of custody from that point to the point where the tree is transferred to a new owner (eg a sawmill, a pulp mill, a charcoal burner, a local fence post maker)

5.2 Internal chain of custody controls.

Your internal chain of custody needs to ensure that when logs (or other certified products) are sold as certified because they come from your members' forests they are genuinely from those forests. This is usually done through a combination of three things: documentation, identification and segregation. Each of these is described below, and as you will realise, none of the three ensures security on its own. Therefore you will need to use a combination of two or three of the methods described.

5.2.1.1 Identification

The easiest way to identify a log as coming from a particular forest is to mark it in some way, for example with a hammer mark or a particular colour of paint. Alternatively, a label of some type can be attached. One way to ensure that logs sold as coming from your group are genuine is to provide members with a means of marking their logs.

However, it is important to remember that marks and labels can be forged, so identification on its own is rarely sufficient to guarantee security.

5.2.1.2 Segregation

A second way of ensuring that logs from a certified forest are not mixed with logs from uncertified sources is by keeping them separated from all other logs until the point of sale. Where the logs are sold at roadside in the member's forest this is not too difficult to do. However, if you are going to do any movement of logs or other products then segregation can be very useful.

For example, you can organise your own trucks to pick up and deliver members' logs to the point of sale. If the trucks are only carrying logs from members' forests then the chance of accidental mixing is removed. However, as with marking logs, there is always the possibility of someone purposely putting uncertified logs into the system to get them sold as certified.

5.2.1.3 Documentation

The final way of providing a reliable chain of custody is through documentation. The most important types of document are:

- a. Records: records of estimated volumes pre-felling, volumes felled and details of volumes sold as certified are very important for verifying chain of custody. Group managers should ensure that this information is always collected, checked and stored. Where there are discrepancies, particularly if the volume sold is greater than the estimated pre-felling volume, then this should be checked immediately to ensure that it isn't due to the introduction on uncertified logs.
- b. Transport documents: documents provided at the harvesting point showing the origin, species, volume and other relevant details with confirmation that the logs are from a certified forest are very important in linking your members' forests to the next point in the chain.

None of the three methods described above is completely secure, but by using a combination of all three, it should be possible to set up a system that ensures that when any of your group members sells 'certified' logs (or other products) they are genuinely from a certified forest.

You need to decide which of the methods you will use. This will depend to some extent on the product being sold. For example, if your members are producing pulp logs from early thinnings, then you probably won't chose to mark each log and might opt for a combination of segregation and documentation. Alternatively, if your members are producing high quality hardwood logs you may chose to use labels or other marks as well as documentation.

Details of how each of the three Model Groups addressed the need for chain of custody is shown in Box 11.

Box 11: Chain of Custody for the Model Groups
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<p>Model Group 1</p>

<p>The members of Model Group 1 harvest hardwood logs on an occasional basis from their small forest holdings. Since most have problems dealing with the legal paperwork required when selling logs, the group manager decided to include this in the service offered and use it to control chain of custody.</p>

- | |
|--|
| <ol style="list-style-type: none"> 1. Members wishing to sell some logs must inform the group manager of the quantity and species to be sold and the purchaser. 2. The manager then prepares the required documentation, including an invoice on behalf of the member with the group's chain of custody certificate number, the quantity and species of logs to be sold and the price. 3. When this has been agreed, the member fells the trees and each log is marked using a special stencil with the group logo. The stencil and spray paint are loaned by the group manager and must be returned. 4. The purchaser can then go to collect the logs, checking that the number and species provided is the same as those specified (and paid for) on the invoice. The stencil mark is particularly important because many of the buyers collect logs from a number of holdings at the same time, so certified and uncertified logs are collected by the same truck. The mark is then used to sort them on arrival in the log yard. (NB The risks associated with this mixing are not the problem of the group manager, since he only has to ensure the chain to the point of sale when the logs are collected. It will be addressed as part of the chain of custody assessment of the purchaser) 5. The monitoring committee is informed of the sale and during the next surveillance will check that the number and species of the stumps matches the number and species of logs sold. |
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Model Group 2

Model Group 2 sell all the logs produced by the group on behalf of the members. Therefore, they can control the chain of custody relatively easily in a way very similar to that used by many companies.

1. To assist in effective marketing of timber, the plantations of each member are assessed and the felling date and approximate volume recorded at least one year prior to final harvest.
2. Once a purchaser for the timber is found, a purchase request is sent to the group manager. Harvesting and transport are then arranged since the group sells all timber delivered which gives members a better price.
3. To deal with transport, the group has developed a long-term relationship with two trucking companies.
4. Neither company works exclusively for the group, so both transport uncertified timber as well. However, both have agreed never to mix loads from different forests – not even from two certified forests. This means occasionally carrying half loads, but it ensures that certified logs are segregated from uncertified logs. Each driver is trained to explain how important this is, and the group have agreed to pay the driver as if it was a full load.
5. The group has also developed special quadruplicate forms (4 copies) to be filled in at the harvest site which gave details of the forest, the date, the approximate volume of logs loaded and the name of the lorry driver. One copy stays on site. The other three go with the driver to the customer.
6. On arrival at the customer, the three forms are signed to confirm delivery and if the customer has a weighbridge, there is space to fill in the delivered weight. One of the forms then stays with the customer while the other two remain with the driver. The truck company keep one of these and return the other to the group manager.
7. The group manager then uses the returned form to generate an invoice which includes the group's chain of custody certificate number and the volume of wood delivered. In addition, the form is used to verify how much timber is collected from each member and compare it to the predicted volume.

Model Group 3

Model Group 3, because of the range of types of membership, ended up with four options for chain of custody.

Firstly, some of the large members decided that while they were happy to certify their forests under a group scheme they wanted to market their timber under their own chain of custody scheme. These members developed a scheme and hired certifiers independently of the group manager.

Secondly, a number of larger members wished to develop their own internal chain of custody systems but to include them under the group's chain of custody. To allow for this, chain of custody was added as a section to the checklists used for the preliminary assessment and monitoring of these members and the internal system checked both before joining and again in annual surveillances. This was then certified as a group chain of custody.

Thirdly, the group was heavily involved in marketing for many of its members, and so set up a system very similar to Model Group 2 (see above).

Finally, it was found necessary to have a fourth category. A substantial number of group members were managers of small to medium areas of natural forest

producing high quality hardwood logs. These members were very independent and insisted that they wanted to be able to sell their own logs without interference from the group manager but under the group certificate.

The group manager quickly realised that the chain of custody system for these members would need to be quite strict since certified logs sold for 25% more than uncertified logs, so there was quite an incentive to sell uncertified logs as if they were certified. To make matters worse, most of these members' forests were close to other uncertified forests producing similar hardwood logs so the opportunity to obtain uncertified logs was always there.

He therefore developed a system which aimed to do three things:

- allow members to sell their own timber under the group chain of custody certificate;
- ensure that members understood the need for, and importance of, maintaining the chain of custody;
- ensure that it was almost impossible for members to cheat the system even if they wished to.

The scheme worked as follows:

1. Prior to joining the scheme, each new member was told about the importance of chain of custody. Two things were stressed –
 - firstly that the whole group would lose credibility and possibly lose their certificate if it was shown that uncertified logs from other forests were being sold as certified.
 - secondly, that any member found doing this would be immediately expelled from the group with no possibility of rejoining and that legal proceedings for fraud might be considered.
2. When a member decides to fell some trees they must select the trees as set out in their management plan and record details of the species, dbh and approximate length of the log for each tree to be felled. This information is recorded on a form provided by the group manager.
3. This information is passed to the Group Manager who then issues the member with a special two-part numbered label for each tree to be felled and a sales document.
 - The labels are in two parts so that one part can be attached to the log, and the other to the stump of the felled tree.
 - The sales document serves two purposes. It lists the logs to be sold including the information on species and size and also the label numbers and confirms that only logs with these label numbers can be considered as certified. It also includes the certificate number, space for the member and his customer to fill in the price agreed and any conditions of sale, and space for each to sign, thus forming a contract between the two parties.
4. A copy of the completed sales document is returned to the group manager for the records.
5. Following the harvesting operation, during the routine monitoring visit, the forester doing the monitoring checks each stump and records the number of the label attached to it to ensure that each label has been used on a log from the certified forest.

This system allows the members maximum flexibility while still ensuring a reliable

6 Getting your group certified

6.1 Certification process

Although different certification bodies may have slightly different procedures and use slightly different terminology, the certification process will always be basically the same:

6.1.1 Choosing your certifier

Once you have decided that you want to get your group certified you will need to contact a certifier. They will probably send you an application form to fill in and, based on the information you provide, send you a proposal which will outline both the certification process and the costs.

If there are a few certification bodies working in your country or region then it may be worth getting a proposal from all of them so you can see which one gives the best deal. The key things to consider when choosing which certifier to work with are:

- a. Costs: How much do they charge? You need to look at all parts of the costs. Most certifiers charge fees for staff time and then charge all the costs of flights, hotels, food and other expenses at cost. You should check what these expenses are likely to be – for example, will they include an international airfare, will auditors stay in the cheaper local hotel or the expensive hotel in town and so on.
- b. Efficiency: How quickly can they start and continue with the job? Certification is always quite a long process, but sometimes if certifiers are very busy it can take even longer. Things to check are:
 - How soon could they carry out the pre-assessment/scoping?
 - How soon after the visit will you get the report?
 - How quickly after you decide to proceed with the main assessment can they begin that process?
 - How soon after the main assessment is complete will a draft report be produced and sent for peer review?
 - How long after the report is sent for peer review will a certification decision be made.

You should bear in mind that if the certifier finds non-conformances and has to raise corrective action requests during the main assessment then the timings you ask for above will be delayed and will depend on how quickly you respond. Make it clear to the certifiers that you understand this, but want to know what commitments they can make assuming there are no problems on your side.

- c. Local service: check where your main contact will be. Will it be in your country or overseas and what language will you have to use.

6.1.2 Pre-assessment or scoping visit

Once you have selected your certifier and signed a contract with them, the next stage is a pre-assessment or scoping visit. This is a short visit made by one or two people from the certification body and has three main purposes:

- a. It gives the certifier an opportunity to get to know your scheme and to plan for the main assessment.
- b. It gives you a chance to meet your certifier and to ask any questions you have about how the certification process will proceed.
- c. It allows the certifier to go through the requirements of the standard with you and see if there are any areas where you are clearly not complying. This is often referred to as 'identifying gaps'.

Of the three purposes, the third is the most important and is what you will spend most of the time doing. The certifier will probably want to spend time in the office, discussing your group system and looking at documents and records, and also to visit some of your members to talk to them and look at their forests.

However, they will not be auditing you. They will ask lots of questions about how you do things but they won't check if your answers are accurate. If you say something is being done, they will assume that is correct and that there is no gap. So it is very important that you are as open and honest as possible so that all the gaps will be identified and you then know what you have to do before the main assessment.

Following the pre-assessment you will probably be given a report which summarises the findings and highlights the gaps that need to be addressed before the main assessment.

6.1.3 Closing out gaps and decision to proceed

If gaps have been identified in your scheme, the next stage is to get them sorted out. There is no set time for how long this takes. For some groups it is just a few days or weeks, for others it can take months. The time depends on what issues have to be addressed and what resources you have to address them.

However, once you are satisfied that you have sorted out all the problems which were identified in the pre-assessment, and any others which you may have thought of yourself, then you should contact your certifier to say that you want to proceed with the main assessment.

6.1.4 Stakeholder consultation

Up until this point, the fact that you are seeking certification will have been kept confidential by your certifier (unless you wanted it made public for any reason). But once you decide to move on to the main assessment, your decision becomes public and your certifier will begin a process of consultation with stakeholders.

The purpose of stakeholder consultation is to allow anyone with an interest in the management of your forest to provide information to the certifier which they think may be relevant to the certification.

Stakeholders include such groups as local communities, the forest department, local government, environment and conservation groups, social organisations, workers and employees and anyone else who is affected by your management.

Your certifier may contact them by letter, telephone, holding public meetings, advertising in the local paper or any other way which seems appropriate. The number of stakeholders contacted and the method used for contacting them will depend on the size and location of your group and the type of stakeholders being contacted.

Many group managers find the idea of stakeholder consultation quite intimidating. In particular there is a concern that some people may hold grudges or have other personal reasons for saying bad things about the group and its manager and members.

However, the certifiers have a very systematic way of dealing with stakeholder comments to ensure that real information is treated seriously while unfounded accusations are not.

When stakeholders provide information to your certifier they must look at each issue and decide what to do about it. In general, there are three possibilities:

- the issue raised is not something covered by the standard or it is covered by the standard but is not the responsibility of the group.

Example: A stakeholder says that the forest on the steep slopes of hills is being over-exploited and causing soil erosion. This is a real issue and relevant to the standard, but the forest in question is managed by the forest department and is not part of the group.

- the issue is relevant to the standard and the group but there is no evidence to show that it is a current problem.

Example: A stakeholder says that group members are planting trees right up to watercourses which is against the law and affects water flows. This would definitely contravene the standard but the stakeholder is unable to give any specific location where this is happening and during the main assessment (see below) although the assessment team check on every site visited there are no examples of planting by watercourses. Therefore, the claim cannot be substantiated.

- the issue is relevant to the standard and the group and there is evidence to show that it is a current problem

Example: In the example above, if the stakeholder could give examples of where planting by watercourses is occurring and, on visiting these sites, the information was found to be accurate, this would be a non-conformance and a Corrective Action Request would be raised.

Quite often the information which comes out of the consultation exercise is very useful for the group management and members as well as the certifier. It often happens that an issue is raised which can easily be addressed, but which the manager was previously unaware of.

6.1.5 Main assessment

Once the stakeholder consultation is underway (the FSC requires certifiers to inform stakeholders at least 4 weeks in advance) the main assessment can begin.

The purpose of the main assessment is for the audit team to collect *objective evidence* to demonstrate that you do (or do not) meet the requirements of the standard. The number of people and number of days it will take to do this will depend on the size and type of your group. In general, the larger the group the more people and time will be needed.

The assessment team will have a team leader and usually (unless your group is very small) one or more team members. Generally each member (including the leader) will have particular areas of expertise such as forest management, conservation and ecology, community forestry, hydrology, law and so on. The make up of the team will have been decided based on the information collected in the pre-assessment and you should be informed of the name of each team member in advance.

If you have a problem with a particular team member then you can inform the certifier and ask to have them replaced. However, your certifier is only likely to agree to this if: a) the person has worked for you in the last 3-5 years, b) there is a relationship between the person and a member of your staff such as him being married to the sister of one of your managers, c) there has been a specific problem between your

organisation and that person which could potentially make them biased in their assessment of your performance.

Opening meeting

The assessment will probably start with an opening meeting. This will be run by the team leader who will explain what will be happening over the next few days. It will also be an opportunity for you to ask any questions you have. It is a good idea to get as many of your staff as possible to the opening meeting so they can meet the team and have some idea of what to expect.

The team leader may ask you to make a short presentation about your group scheme. The team will also want to start planning who they want to see and where they want to go.

Assessment

The assessment itself consists of three main activities:

- Reviewing documents – members of the team will want to see a range of different documents and records and to check their content. They will check that your documents meet the requirements of the standard. They will then check that everything you and your members do complies with your documentation.
- Visiting the forest – a random sample of members will be chosen and the team will want to visit their forests. It will be useful if the member can be present during the visit. You will also need to be sure you have arranged adequate transport. You will need to make it clear to all members that they must allow the certifier access to their properties.
- Discussions and interviews – finally, the team will spend a lot of time talking to people about what they do and how they do it. Encourage people to respond openly and honestly. It is likely that when talking to field staff or contractors the team will not want group management or even the group member involved in the discussion. This is normal and nothing to worry about.

Findings and CARs

During the course of the assessment the team will be looking for evidence that the standard is being complied with. If they find an area where there is a non-compliance then they will raise a Corrective Action Request (CAR) also referred to as a 'Condition'. There are two types of CAR:

Major CARs (also called Pre-conditions) are raised when there is a serious non-compliance with a requirement of the FSC. If a Major CAR is raised you will have to address it adequately BEFORE you can be certified (this is why it is also called a pre-condition as it has to be addressed pre-certification).

Minor CARs (also called Conditions) are raised when you are partially complying with a requirement but not fully. If a Minor CAR is raised you can still be certified but only on the condition that you agree to address the issue within an agreed time frame (hence the alternative name of 'Condition'). It is important to remember that if you do not address a Minor CAR within the time agreed it will automatically be raised to a Major CAR and you will have to address the issue within a month or lose your certificate.

Almost every assessment results in several CARs. It is almost unheard of not to get any, and it is quite usual to get as many as 10 or 15 so don't worry if the assessment team start to talk about non-conformances. The FSC standard is a very tough and very complex standard, so even the best forest management is likely to be weak in one or two places.

Closing meeting

Assessments nearly always end with a closing meeting where the team report back to you on their findings and in particular on the CARs (or Conditions). Again, don't be afraid to ask questions and to discuss the findings. In particular, if you think that the team may have misunderstood something, or raised a CAR without seeing a critical document then tell them.

6.1.6 Report and peer review

Following the assessment the team leader, assisted by the team members, will write a report. The FSC requires that a summary of the report, including background information and the results of the assessment, is made public so the report will include both the public summary and the more detailed assessment report.

When the report is complete, it will be sent to two or three independent specialists who have been selected as peer reviewers. As with the team members, the peer reviewers will be selected by the certification body, but you should be informed who they are and can tell your certifier if there is any problem.

The peer reviewers are asked to comment on whether, based on the information provided in the report, the assessment seems to be adequate and the findings reasonable.

Any issues raised by peer reviewers must be responded to by the certifier and, if appropriate can lead to new or revised CARs.

6.1.7 Certification decision and surveillance

Once all Major CARs (or pre-conditions) have been adequately addressed, and any peer review comments have been responded to the certification body will finally make a certification decision.

The certificate is valid for five years but is conditional on the findings from annual surveillance visits which the certification body will carry out to verify that your group is continuing to comply with all the requirements of the standard.

As with the main assessment, the surveillance team will choose which members' forests they want to visit, and all members must agree to allow access to their properties.

6.2 *A few specific points*

6.2.1 Minimum number of members before seeking certification

Most certification bodies will require you to have at least three members before seeking certification. This may be more for groups aiming to have very large numbers of members. If there is a reason why you want to seek certification with less than three members in the group, you will need to discuss this with the certifier and ask for an exception to be made.

6.2.2 Early surveillance following rapid growth

Certification bodies usually carry out surveillance visits annually (though the first visit after certification is almost always sooner to deal with Corrective Action Requests raised during the main assessment). However, if the group grows rapidly in terms of numbers or area of forest covered, or if there is a change in the type of member, most certification bodies will carry out a surveillance visit early.

The reason for this is that when a certificate is issued the certification body is verifying that the standard is being met. It is responsible for ensuring that the standard continues to be met all the time the certificate exists and if there is a big change in the group then

there is a risk that the standard will no longer be met. Experience has shown that a group may function extremely well when it has, for example, 20 members, but is not really equipped to deal with a rapid expansion to 50 members. Similarly, a group which meets all the requirements while its members own less than 100 ha each may not have adequate control mechanisms for members with 1000 ha. Therefore, an early surveillance visit will probably be requested to allow the certification body to verify that the group manager is continuing to ensure compliance.

6.2.3 Expansion of membership to different forest types

As explained in Section 2, groups should be set up for specific membership types. One group may include several types, but the group manager must be able to demonstrate that the group has been developed specifically to deal with each membership type included.

If a manager of an already-existing group decides to expand the range of membership types then:

- he or she will need to develop appropriate documentation (particularly group requirements and entry and monitoring checklists) for the new membership type;
- inform the certification body of the change;
- probably undergo an early surveillance visit to ensure that the group has been adequately developed to accommodate the new membership type.

7 Appendices

Appendix 1: Model documentation

Appendix 2: Contact details of FSC-accredited certification bodies

Appendix 3: FSC Principles and Criteria