






Forest Stewardship Council®



## Processing FSC Policy for Association complaints

**FSC-PRO-01-009 V4-0 EN**

**Draft 5**

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**PROCESSING FSC POLICY FOR ASSOCIATION COMPLAINTS**  
**FSC-PRO-01-009 V4-0 EN**

**DRAFT 5**

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

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

## Introduction

FSC-POL-01-004 *Policy for the Association of Organizations with FSC, or FSC Policy for Association (PfA)*, is an expression of the values shared by organizations associated with FSC. It defines six unacceptable activities that associated organizations and their *affiliated groups*\* commit to avoid in both certified and non-certified operations.

The procedure in this document, FSC-PRO-01-009, describes the process used by FSC to address formal *complaints*\* of violations to the *FSC Policy for Association* in a timely, independent and effective manner.

FSC is committed to finding solutions to issues arising from unacceptable activities. In implementing this procedure, FSC will assess multiple options, from *mediation*\* to investigation, sanctions and conditions-setting, to improve the performance of organizations associated with FSC, remedy harm caused by unacceptable activities and protect FSC's reputation.

## Version history

- V1-0** Initial version, not specific to *complaints*\* of non-conformance with the *FSC Policy for Association*.
- V2-0** Revised to incorporate the requirement for formal *complaints*\* of non-conformance with the *FSC Policy for Association*.
- V2-1** Revised to include requirements about communicating FSC Board decisions on *complaints*\* to the *parties*\* and stakeholders.
- V3-0** Revised for use for *FSC Policy for Association* complaints only. The Guidance for Complaints Panels evaluating *FSC Policy for Association* complaints, and the basic principles of the FSC Dispute Resolution System, were integrated into this procedure.
- V4-0** Revised to introduce external investigations, *decision panel*\*, use of *alternative dispute resolution*\*, FSC initiated investigations, alternative consequences for violations and several other changes to the procedure.

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## A Objective

This procedure is used to process *complaints\** about violations of the *FSC Policy for Association*, as well as to define the consequences to the associated organization and their *affiliated groups\** when a violation is found to have occurred.

*Disassociation\** will be considered as a measure of last resort against organizations and their *affiliated groups\** that are found to be in violation of the *FSC Policy for Association*. The procedure also allows FSC to impose measures to redress operations of associated organizations depending on the gravity of the violations and when deemed necessary to preserve FSC's reputation.

## B Scope

This procedure is applied to organizations associated with FSC (i.e., members, certificate holders and certification bodies) and to their *affiliated groups\**.

An evaluation according to this procedure may be initiated by FSC upon presentation of *substantial information\** that the associated organization (or its *affiliated group\**) may be in violation of the *FSC Policy for Association*. This may occur through a formal *complaint\** lodged by a stakeholder or by other means, as further detailed in Clause 2.3 below.

This procedure is only used to evaluate possible violations to the *FSC Policy for Association*. *Complaints\** against an organization related to the six unacceptable activities of the *FSC Policy for Association* that overlap with certification requirements shall follow the ordinary route for dispute resolution defined in respective certification requirements and *FSC-PRO-01-008 Processing Complaints in the FSC Certification Scheme*. The *complaints\** will be processed according to dispute resolution procedures of the certificate holder, the certification body and/or Assurance Services International.

## C Effective and validity dates

Approval date	tbd
Publication date	tbd
Effective date	tbd
Transition period	n/a
Period of validity	Until replaced or withdrawn

## D References

The following references are relevant for the application of this document. For undated references, the latest edition of the referenced document (including any amendments) applies.

<i>FSC-POL-01-004</i>	<i>Policy for the Association of Organizations with FSC</i>
<i>FSC-PRO-01-008</i>	<i>Processing Complaints in the FSC Certification Scheme</i>

## E Terms and definitions

For the purposes of this procedure, the terms and definitions given in *FSC-POL-01-004 Policy for the Association of Organizations with FSC*, *FSC-STD-01-002 FSC Glossary of Terms* and the following apply:

***Allegation:*** A statement of belief that some wrong or harm has occurred.

**Alternative dispute resolution (ADR):** Resolving disputes and agreeing on corrective measures without engaging in the formal *complaint\** process, through methods such as negotiation and *mediation\**.

**Affiliated Group:** The totality of legal entities to which an associated organization is affiliated in a corporate relationship in which either party controls the performance of the other (e.g. parent or sister company, subsidiary, holding company, joint venture, etc.) as described in Policy for Association FSC-POL-01-004.

**Association (Associated Organization):** An association with FSC is formally established through any of the following contractual relationships: FSC membership agreement; FSC certificate holder license agreement; FSC certification body license agreement.

**Complaint (formal complaint):** A formal *allegation\** against a party based on substantiated information and submitted using an FSC template for Policy for Association complaints.

**Complainant:** An individual or organization filing a formal *complaint\**.

**Decision panel:** A panel of three participants called to evaluate, decide and in case of *disassociation\**, to recommend a decision on Policy for Association *complaint\** cases. The pool of candidates is pre-selected, and participants are called based on the characteristics of the *complaint\** and expertise of the candidates. See Annex 2 for further details.

**Defendant:** A person or organization against whom a *complaint\** has been filed.

**Disassociation:** The termination of all existing contractual relationships (member and license) between FSC and the associated organization (and its *affiliated group\**). *Disassociation\** also prevents entry into any new contractual relationships with FSC.

**Dialogue:** An interaction focusing on increasing understanding, looking into deeper issues instead of positions and exploring options, followed with discussion with an aim on agreeing on the right way to proceed.

**Ending a disassociation:** Ending a disassociation implies that the disassociated organization has met the conditions to be eligible to apply for association with FSC again, if it wishes to do so. It does not mean that any previous contractual relationships are automatically resumed, or that any certificates are reinstated.

**Investigator(s):** One or more persons established on an ad hoc basis for the purpose of investigating possible violations to the FSC Policy for Association.

**Mediation:** An attempt to settle a dispute through active participation of an independent third-party that aids *parties\** to agree on a fair outcome.

**Parties:** The entities directly involved in the investigation, including the entity that filed the *complaint\** (i.e., the *complainant\**) and the entity against which the *complaint\** is filed (i.e., the *defendant\**)

**Substantial information:** Credible information provided by third parties and/ or gathered through independent research obtained from reliable/renowned sources which constitutes a solid piece of evidence to be considered in an investigation. *Substantial information\** may include any of the following forms so long as the evidence meets the criteria required in this definition: scientific reports, technical analysis, certification reports, corroborated news articles, official reports and/ or announcements by governmental authorities, legal analysis, Geographic

Information System information (boundary coordinates, satellite change mapping), videos or footage, images, independent interviews, affidavits and declarations, meeting minutes, and corporate/organizational information.

### **Verbal forms for the expression of provisions**

[Adapted from ISO/IEC Directives Part 2: Rules for the structure and drafting of International Standards]

“shall”: indicates requirements strictly to be followed in order to conform to the document.

“should”: indicates that among several possibilities one is recommended as particularly suitable, without mentioning or excluding others, or that a certain course of action is preferred but not necessarily required.

“may”: indicates a course of action permissible within the limits of the document.

“can”: is used for statements of possibility and capability, whether material, physical or causal.

## 1 Principles and General Requirements

- 1.1 In the spirit of the FSC system, and following the “lowest level principle”, stakeholders should first attempt to resolve potential *FSC Policy for Association* violations through *dialogue\** and/or *mediation\** and to engage in all reasonable efforts to address concerns.

NOTE: Before initiating an evaluation according to this procedure, FSC will first assess whether the potential violation can be addressed through *alternative dispute resolution\** techniques within a reasonable time, and to the satisfaction of FSC and affected stakeholders. *Dialogue\** with the *parties\** with the aim of resolving the issue through less formal means, is a cornerstone of this procedure and is promoted at multiple steps in this process and whenever possible.

- 1.2 The principles of fair treatment and inclusivity are followed. Throughout the process, FSC will provide the *parties\** with opportunities to supply evidence and counterevidence, stating their position and commenting on conclusions.
- 1.3 The *parties\** and FSC should refrain from commenting publicly on the situation and actions being taken by FSC until such time as defined in this procedure. The *parties\** may be expected to sign a Non-Disclosure Agreement (NDA) in relation to any confidential information produced during the investigation.
- 1.4 The *parties\** shall cooperate in the process.
- 1.5 All entities involved in investigating, evaluating and decision-making shall be free of any conflict of interest.
- 1.6 The associated organization may voluntarily terminate its association with FSC at any time. However, FSC has the discretion to continue the investigation and evaluation process.
- 1.7 The *complainant\** may withdraw the formal *complaint\** voluntarily at any time. However, if there is *substantial information\** of a possible violation, FSC has the discretion to continue the investigation and evaluation process.

## 2 Initiating an Evaluation

- 2.1 An evaluation of a potential violation to the FSC Policy for Association is initiated through the submission of a formal stakeholder *complaint\**, accompanied by *substantial information\** about *allegations\** made.
- 2.2 Any stakeholder may submit a formal *complaint\**.
- 2.3 In exceptional cases, FSC may independently initiate an evaluation if *substantial information\** is brought to the attention of FSC through other means.
- 2.4 The process for evaluating whether the organization is in violation of the *FSC Policy for Association* is effectively the same irrespective of which of the above pathways (Clause 2.1 or 2.3) are used to initiate the process, with additional sub-steps defined in situations where there is a *complainant\** involved in the process (i.e., when a formal stakeholder *complaint\** has been lodged).
- 2.5 The scale and timing of FSC’s response to *allegations\** of violation of the *FSC Policy for Association* shall be based on the severity of the issues and the risk to FSC’s reputation.



## Notification and Receipt

- 2.6 FSC shall be notified and provided with *substantial information*\* that the associated organization or its *affiliated group*\* may be in violation of the FSC Policy for Association.
- 2.7 The *complainant*\* shall complete the complaint form on FSC website in either English or Spanish. Only *complaints*\* that provide all required information in the form shall be accepted.
- 2.8 Receipt of the *complaint*\* shall be acknowledged within ten (10) business days.

## Resolution or Initiation of Evaluation

- 2.9 Where appropriate, FSC shall contact the *parties*\* with the aim of promoting *dialogue*\* between the *parties*\* and to resolve the situation without initiating a full investigation. *Mediation*\* or other forms of facilitated *dialogue*\* may take place, if accepted by the *defendant*\* and the affected parties. FSC shall not act as a mediator.
- 2.10 In case the *substantial information*\* provided by the *complainant*\* is regarded as sufficient, such as final conclusions of legal proceedings, FSC may decide to move directly to decision making without establishing an additional investigation process. In case there is an ongoing investigation by authorities, or any other active official process related to the *allegations*\*, FSC shall wait for the completion of such process before launching an investigation.
- 2.11 If the *complaint*\* cannot be resolved through *alternative dispute resolution*\* techniques to the satisfaction of FSC, the *complaint*\* may be accepted provided that:
  - I. all required information in the *complaint*\* submission form is provided;
  - II. there is *substantial information*\* to warrant a full evaluation; and
  - III. the *complaint*\* falls within the scope of the *FSC Policy for Association*.
- 2.12 The decision to accept or reject the *complaint*\* shall be communicated to the *complainant*\* and *defendant*\*.
- 2.13 If the *complaint*\* is accepted, a public announcement shall be made.
- 2.14 Upon the decision to initiate an investigation, a timeline shall be developed by FSC for each step in the process.

## 3 Investigation

- 3.1 An *investigator*\* (or team of investigators) shall be assigned by FSC, to conduct an in-depth investigation of the alleged violation(s). Depending on the case, the *investigator(s)*\* may be composed of an expert consultant or a team of consultants. See Annex 2 for the Investigator Terms of Reference.
- 3.2 The role of the *investigator(s)*\* is to gather, examine and analyze evidence as to whether the organization is in violation of the *FSC Policy for Association*, evaluating all aspects of the issue through diverse means. The *investigator(s)*\* shall:
  - a) Review all relevant information gathered through certification reports, the formal *complaint*\* submission, and any other evidence provided and/or available.
  - b) Contact the *parties*\* to request additional information (if needed) and to ascertain understanding their perspectives.
  - c) Contact third *parties*\*, as necessary. Interviews are conducted with consideration of interviewee safety, particularly to vulnerable groups.
  - d) Verify all information, as possible, through field visits, cross-checking of information,

technical or scientific review, GIS data, and other means.

- e) Maintain ongoing communication with FSC, providing updates to designated FSC staff.

NOTE: The role of the *investigator(s)\** is not to act as a mediator.

- 3.3 If new information arises during the investigation that was not part of the original *complaint\** yet points to a possible violation of the *FSC Policy for Association*, FSC may include it in the investigation.
- 3.4 The *complainant\** and *defendant\** shall be requested to agree with the selection of the *investigator(s)\** and shall be given maximum of 10 (ten) business days to respond. An objection shall be based on valid reasons, such as conflict of interest.
- 3.5 FSC shall make the final decision on any objection by the *complainant\** or *defendant\**. If the objection is honored, another investigator is selected.
- 3.6 FSC may also seek advice from the *decision panel\** (see chapter 4 and Annex 2) in selecting the *investigator(s)\**.
- 3.7 The scale of the investigation shall be based on the complexity of and potential risk presented by the case.
- 3.8 The *investigator(s)\** shall develop an investigation report that describes the findings of the investigation.
- 3.9 The *investigator(s)\** may recommend in the report that FSC seek resolution of the issue with the *parties\** without moving to decision-making.

#### Verification of Findings

- 3.10 The *defendant\** shall be provided with a copy of the investigation report and the *complainant\** with a summary of the report, with confidential information removed, at the discretion of FSC. They are given a maximum of 10 (ten) business days to provide a response to the findings. They shall keep this report confidential.
- 3.11 Deliberate attempts by the organization to conceal evidence of the violation is grounds for consideration of *disassociation\**.

#### 4 Decision Making

- 4.1 FSC shall form a *decision panel\** for each case that is investigated or for which sufficient information allowing decision making is provided by the *complaint\** (see clause 2.10). See Annex 2 section B. Decision Panel for Terms of Reference.
- 4.2 The composition of the *decision panel\** shall be presented to the *complainant\** and the *defendant\** for consultation with regards to conflict of interest.
- 4.3 The *complainant\** and *defendant\** shall have the right to object to the selection of a *decision panel\** participant, if there is a perceived conflict of interest. They are given a maximum of 10 (ten) business days, after notification of the *decision panel\** participants, to raise an objection.
- 4.4 FSC shall make the final decision on any objection by the *complainant\** or *defendant\**. If the objection is honored, another panel candidate is called to join the panel.
- 4.5 The panel will evaluate the case based on the provided information, investigation report(s) and any response provided by the *defendant\**, and take decisions on
  - a) maintaining association without conditions, or
  - b) maintaining association with related temporary conditions.

- 4.6 In case the panel evaluates that FSC should resolve to disassociate from the organization, the panel shall recommend to the FSC Board of Directors
- a) a decision to disassociate and
  - b) main conditions to fulfil to end *disassociation*\*.
- 4.7 The standard of certainty “clear and convincing evidence” should be used as the threshold for making decisions on whether there is a violation of the FSC Policy for Association justifying *disassociation*\*. This standard is met when the certainty of the violation is substantially more probable to be true than not (see Annex 1).
- NOTE: See Annex 3 for guidance on determining the recommended action.
- 4.8 The final decision shall be binding for all *parties*\* involved and may not be appealed.

### **Communication of the Decision**

- 4.9 FSC shall communicate the decision to the *parties*\*.
- 4.10 A public announcement shall be made by FSC for any decision taken by the *decision panel*\* or FSC Board of Directors concerning cases initiated by formal *complaint*\*.
- 4.11 For evaluations initiated by FSC, a public announcement shall be made if the decision is taken to disassociate from the organization or to assign temporary conditions or sanctions.
- 4.12 The announcement and a summary of the investigation report shall be published on the FSC website.

### **Temporary Conditions and Sanctions or Disassociation**

- 4.13 In case of setting temporary conditions and sanctions:
- a) The organization shall be required to implement the conditions within the timeframe specified in the decision.
  - b) Achievement of these conditions will be monitored by an independent third party, appointed by FSC; deviations shall be reported to FSC.
  - c) The decision to disassociate may be taken if the conditions are not satisfactorily fulfilled within the stated timeframe.
- 4.14 In case of *disassociation*\*:
- a) Action to terminate the contractual relationship shall normally be taken within 30 days after public communication of the decision.
  - b) The disassociated organization interested in *ending disassociation*\* with FSC shall request to enter into a process for *ending the disassociation*\*.

NOTE: See Annex 4 for a general description of the process for *ending disassociation*\*, including pre-conditions that must be fulfilled in order to initiate the process.

## **5 Record-keeping**

- 5.1 FSC shall maintain all relevant incoming and outgoing correspondence, reports, decisions, action plans and other information in electronic and/or hard copy for a minimum period of ten (10) years.

## Annex 1: Standard of Certainty

### The Standard of Certainty

The standard of certainty is the degree of certainty applied to determine whether an *allegation*\* is defensible or not. In the context of the *FSC Policy for Association*, the standard of certainty is a threshold that the *investigator(s)\** and *decision panel\** consider when evaluating *allegations\** to determine whether an organization is in violation of *FSC Policy for Association*, and therefore whether *disassociation\** or temporary conditions and sanctions should be considered.

### Overview of Standards of Certainty

The following is an overview of commonly used standards of certainty:

#### Preponderance of evidence

This standard is based on a balance of probabilities. The evidence available would be more likely to be true than not.

#### Clear and convincing evidence

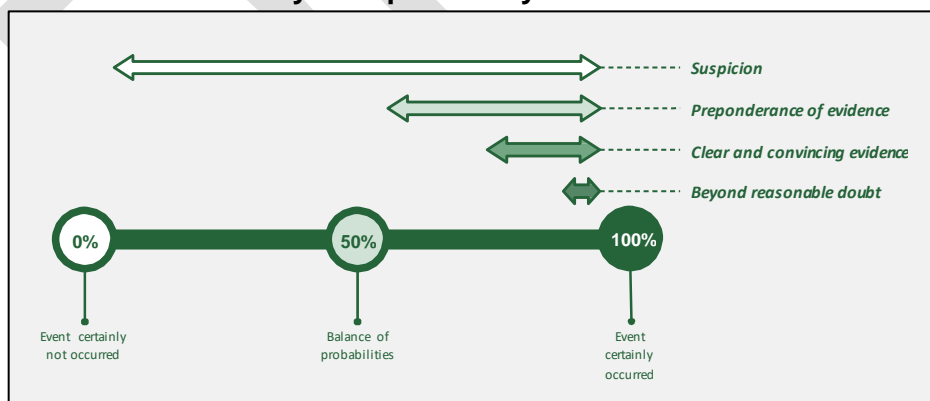
This standard is higher than the preponderance of evidence. The evidence available must be substantially more probable to be true than not. There must be a firm conviction or belief that the organization is accountable for a violation of the *FSC Policy for Association*.

#### Beyond reasonable doubt

There must be proof of such a convincing character that there is no reasonable doubt in believing that the organization is accountable for a violation of the *FSC Policy for Association*. However, it does not mean an absolute certainty or no doubt.

With respect to the *FSC Policy for Association*, 'clear and convincing evidence' should be used as the standard of certainty in making decisions to disassociate from an organization.

### Standard of Certainty on a probability scale



## Annex 2: Terms of Reference of the Investigator and Decision Panel

### A. Investigator

1. The *investigator(s)*\* are assigned by FSC on an ad-hoc basis to investigate the case.
2. Depending on the case, the *investigator(s)*\* may be composed of an expert consultant or a team of consultants. This is determined considering factors such as:
  - a) level of complexity of the case;
  - b) technical expertise required;
  - c) language;
  - d) regional/local knowledge needed.
3. The *investigator(s)*\* shall be free of any conflicts of interest related to the case.
4. The *investigator(s)*\* shall sign and adhere to a confidentiality agreement.

### B. Decision Panel

1. FSC shall have a pool of six to nine preselected *decision panel*\* candidates, selected based on expertise in dispute handling and areas of unacceptable activities.
2. The *decision panel*\* candidates shall be appointed by the FSC Board of Directors to serve for a three-year term, with possible renewal for an additional term.
3. For each case, three candidates are called to serve as a *decision panel*\* by FSC, based on *allegations*\* presented and the candidate's area of expertise.
4. The working language of the panel shall be English.
5. Selected panel participants shall be free of any conflicts of interest related to the case.
6. The panel participants shall sign a non-disclosure agreement and adhere to strict confidentiality.
7. The *complainant*\* and *defendant*\* shall have the right to object to the *decision panel*\* participant, if there is a perceived conflict of interest. They are given maximum of 10 (ten) business days, after notification of the *decision panel*\* participants, to raise an objection.
8. FSC shall make the final decision on any objection by the *complainant*\* or *defendant*\*. If the objection is honored, another panel candidate is called to participate the panel.
9. The participation in a *decision panel*\* is on pro-bono voluntary basis only.

### Annex 3: Guidance for Determining the Consequence of a Violation to the FSC Policy for Association

The following guidance is used to determine whether to issue temporary conditions and sanctions to the organization or to disassociate from the organization.

In order to maintain association, the following three factors **must be met**:

1. No significant remaining reputational risk to FSC
2. The unacceptable activity has stopped occurring
3. No risk of material originating from operations directly violating the *FSC Policy for Association* entering into FSC products

If the above are met, then the following factors shall be considered in weighing the decision to maintain association with conditions:

Factor	Supports maintaining, if
a) <b>Frequency</b> of occurring violations for the associated organization or any entity within the <i>affiliated group</i> *	first-time instead of repeated violations
b) <b>Time dimension</b> regarding how long the organization was involved in the unacceptable activity	short term instead of long term
c) <b>Timeline in progressing</b> in implementation of the conditions	the main conditions are reachable within short time (e.g. 12 months) instead of over long period of time
d) <b>Cause</b> of the unacceptable activity	oversight instead of systemic
e) <b>Number</b> of unacceptable activities violated	one or few instead of many
f) <b>Degree</b> of social or environmental damage committed	minimal instead of severe
g) <b>Means of control</b> of the organization regarding the unacceptable activity	low available means of control instead of high
h) <b>Reputational damage</b> already done	minimal instead of severe
i) The <b>likelihood</b> of the organization to re-engage in the event of a <i>disassociation</i> * decision and thereby the likelihood of whether a <i>disassociation</i> * decision would lead to positive impacts on the ground	low instead of high
j) The <b>potential</b> and capability of the organization to drive positive impacts in a given sector or region with FSC	high instead of low

NOTE: FSC may decide to suspend the Trademark License Agreement of the organization until conditions set are met, in cases of maintaining association with temporary conditions.

#### Guiding Principles for Conditions Placed on Organizations

The conditions placed on an organization are based on the violations that occurred with respect to the FSC Policy for Association as well as other trust-building measures. They include:

- a) Remedy (both social and environmental) to address damages and impacts of past violations.
- b) Improved due diligence and quality management systems to prevent future violations of the FSC Policy for Association from occurring.
- c) Transparency in reporting implementation of conditions and demonstrated stakeholder engagement in the process.
- d) Independent verification of implementation of the conditions
- e) Other trust-building measures, such as actions towards conformance with the organization's own policy commitments.

- f) Other, as decided by the *decision panel*\* or the FSC Board of Directors.

For disassociated organizations, these conditions are further elaborated during the process to develop a time-bound organization specific roadmap with associated action plans for *ending the disassociation*\* (see Annex 4).

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## Annex 4: Ending a Disassociation

A disassociated organization may request to start a process to *end disassociation\** by expressing interest to FSC. As part of the process to *end disassociation\**, an organization specific roadmap towards *ending the disassociation\** status of an organization is developed. A roadmap is a framework and plan, based on requirements on how to remedy, correct and prevent reoccurrence of previously identified violations of the *FSC Policy for Association*. It also includes other trust-building measures. The roadmap may be complemented by detailed, case-specific action plans, performance measures and reporting requirements associated with each of the conditions. *Disassociation\** can be lifted only upon agreed completion of the conditions specified in the roadmap.

### Prerequisites for Initiating the Process for Ending Disassociation

Prior to entering into a formalized engagement with FSC through an agreed roadmap, the disassociated organization needs to meet certain preconditions. The following high-level indicators have been identified as critical thresholds for determining the readiness of a disassociated organization for a roadmap process:

1. The disassociated organization demonstrates a top management commitment towards complying with the *FSC Policy for Association*.
2. The disassociated organization has adopted a set of relevant initiatives (policies, protocols, codes of conduct, etc.) abandoning previous business practices and adopting (more) responsible practices.
3. The disassociated organization has commenced with credible steps towards implementation of new policies, including communication of the general elements of a roadmap to be developed with relevant staff, and in a transparent manner involving relevant stakeholders.
4. Issues of concern for FSC that should constitute the roadmap elements have been identified so that relevant targets for the organization's actions and performance can be comprehensively defined.
5. The roadmap's targeted end points are reachable by the organization within a foreseeable period of time and can be independently verified.
6. The organization commits to reimbursing the costs of investigation process and to compensating the costs of the process of *ending disassociation\**.

### Process of Ending Disassociation:

Step	By
1. Indication of readiness and interest of ending <i>disassociation*</i>	Organization
2. Assessment and decision to start a process of ending <i>disassociation*</i>	FSC
3. Development of the roadmap requirements based on FSC guidance document	Independent third party with organization
4. Approval of the roadmap	FSC
5. Implementation of the requirements	Organization
6. Verification of the targets reached	Independent third party
7. Ending <i>disassociation*</i>	FSC Board of Directors





Forest Stewardship Council®

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