

COMPILATION OF STAKEHOLDER COMMENTS AND PSU OBSERVATIONS ON FSC-STD-20-001 Version 4-0 Draft 1-0 EN

General requirements for FSC accredited certification bodies

Document type	Code	Version No.	Draft No.	Circulated	Policy Manager	Consultation	Deadline for comment	Compilation date
Standard	FSC-STD-20-001	4-0	1-0	01 December, 2014	Dorothee Jung	Public	09 February, 2015	11 May, 2015

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Part No. / Clause. No. Note/Annex/ Definition	G = general; T = technical; E = editorial	Justification / rationale for change	Suggested new wording (additions, modifications, deletions)	on each submitted comment	M-econ, M-env; M-soc, CB, CH, NO / North-South
General	G	We congratulate the FSC BoD to have taken the decision to develop an independent accreditation standard which can better fit the conditions for FSC certification worldwide than to follow ISO 17065 only. The text is a great improvement from the current version! We also see the proposals phrased in the green boxes as good improvements of the FSC system. We want to congratulate the drafting group to having reached this far with a very tight time limit. This is one of the most important documents in the FSC system! But the problem we have with the text is that it is a text which is gathered from several other documents together with the current requirements. Reading it through it gives the feeling that it would have needed one more thorough work through to get it in more even shape, both in language and in structure. Hopefully this can be done after the first draft. It is important to have a concentrated and clear text	None	Yes, agreed.	FSC Sweden Lina Bergström/ Eva Mattsson

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		which not grows too much in pages.			
General	G	FSC should strive for using plain English in these kinds of documents. Still with well-defined terms, but a simpler language will make it easier for everyone to understand. Especially as there are many who don't have English or Spanish as their first language. The Soil Association has worked successfully with plain English in their standards for organic agriculture and in their certification documents.	Start to use plain English for all FSC documents and communication.	We investigated the idea of having an edited Plain English version of the standard, but decided against it. This may make sense in the context of forest management certification requirements, but this standard is a technical standard developed for certification bodies. Of course the requirements need to be clear, but a higher level of technicality is acceptable.	FSC Sweden Lina Bergström/ Eva Mattsson
General	G	To get a better formulated text the IGI drafting rules can help. Not all parts are applicable but much is!	Adapt the IGI drafting rules and go through this draft in detail!	The IGI drafting rules were checked and where applicable used to screen the draft.	FSC Sweden Lina Bergström/ Eva Mattsson
General	T	This is a detail – but it helps to clearly signal that this is a draft also on the front page as for the IGI draft	Put “draft” on the front page.	Yes, amended.	FSC Sweden Lina Bergström/ Eva Mattsson
Structure	E	The impression when reading through the document is that some areas are of an extremely much higher concern than others. Some parts are long and winding while others also covering important areas are much more concentrated and short. It would be better if the texts were more even and a more concentrated text was used. Some issues are mentioned in many places like the License agreement for FSC Certification Scheme which pops up in different places. The numbering in some chapters is made with four digits while others have three. Maybe a detail but it doesn't look so professional. It could be divided in another way.	Make the balance between different chapters more even, concentrate text. Look into the numbering of different chapters/parts.	The draft was checked to eliminate redundancies and align FSC and ISO language, where possible (the guiding principle is to still achieve ISO compatibility). The numbering was also adapted to only have 3 digits.	FSC Sweden Lina Bergström/ Eva Mattsson

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Notes	T	The notes are said to be normative. At the same time the text in the notes differs so sometimes it is a criteria text and sometimes it is close to a good advice. There is a few footnotes – they can also be incorporated in the text	Take away the notes and incorporate in the criteria text. Take away the good advice and if they are to be kept introduce a non-normative guidance. Incorporate footnotes in the text.	Agreed to integrate the footnotes and screen the notes. It was agreed at Working Group level to only keep notes that provide needed clarification to certification bodies, but to eliminate notes that are mainly for interested parties.	FSC Sweden Lina Bergström/ Eva Mattsson
Language	T	In the text there are numerous wordings like “at least”, “as far as possible”, “in particular to”, “any”. These words makes the text much more unclear and also difficult to read and understand. If the text are minimum requirements, state so in the beginning and clean out the text. There is also another set of vague words like “similar issues”, “in particular to”, “all necessary”, for ex – with a list of some possibilities. All these do just make the document unclearer and less enforceable, and more open for interpretations. A question is about why figures are written both in figures and in text? It makes the text more difficult to read.	Take away vague words, state that the requirements are minimum requirements. Take away all lists with examples and references to similar issues.	Some references and examples are kept, see also above. Exhaustive lists are not possible to be included in a generic standard, some specification is needed. Numbers written in text and in figure is used in alignment with ISO.	FSC Sweden Lina Bergström/ Eva Mattsson
N/A	G, E	There are examples throughout the document where later clauses are referenced in earlier clauses instead of the other way around. Where at all possible, it is recommended that the requirement is stated in the earlier clause where it is being first noted and then refer to that requirement in the later applicable clause.		Ok, amended.	Rainforest Alliance Alison Lesure, Laura Terrall
General	G	Reference to ASI Why is ASI mentioned in the Standard? Does this not create an inherent lack of independence?		Reference is changed to refer to the “accreditation body” instead of ASI.	SGS Christian Kobel
General Notes	E	Assign Number to the notes within the standard. It is really difficult to reference otherwise.		Where more than 1 note is added to a requirement numbers are included.	GFA Matthias Rau

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General		Your e-mail to me w/ attached DRAFT standard has been received. I, as well as other Caliper personnel, do NOT have the time to review this DRAFT (even the green-boxed notations). Especially confusing is the Comment Form, and unreadable neon-blue notations within the green-boxed segments (see Pg. 52 half-way down). Although it is gracious of FSC to offer stakeholders, like ourselves, the opportunity to comment and critique on this DRAFT standard, the majority of us do not possess the extensive and complex industry technology background to do so. Additionally, it is suggested that FSC develop a standard, written in simple, lay-term English which can be precise and informative in order for stakeholders to comprehend and use.		Thank you for your suggestions for improving the readability of the draft and comment form, which are considered for the creation of the second draft version.	CH Diane Sinclair Caliper Woodworking Corp.
Page 4		I do agree with the de-linking of FSC standards with ISO. As an independent democratic standard setting organisation with its unique structure we don't want to take ISO or ISEAL for granted and change in our standards related to changes in those standards should be independently evaluated.		Yes, agreed.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 4	T	Information on conformity with ISEAL Assurance Code (compatibility with ISO 17065) Poor standard setting practice and bad political decision to de-link from ISO 17065 as in principle ISEAL does not dismiss ISO accreditation standards. We understand this decision cannot be revoked, so just please mind the copyrights when copying and pasting sentences from ISO standards.	Re-establish link with ISO17065 in line with other major standard setting organisations.	Only the "automatic" link to ISO is eliminated, but content wise the linkage will remain, as the standard is developed to ensure compatibility with ISO 17065. FSC has received permission from ISO (DIN) for the use of ISO standard language, see page 2 of the draft.	BM Trada John Lovelock

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Page 4	G	There are no reference to ISO 17024 in ISO 17065 or in ISO 17021 or in ISEAL Assurance Code. There is no reason to consider this standard in this accreditation standard		Even though the ISEAL Assurance Code is a key document for revising the standard, FSC also has the liberty to take on other requirements, where considered relevant.	NEPCon Tigran Martirosyan
Page 4		Information on conformity with ISEAL Assurance Code (compatibility with ISO 17065) Good		Thank you	FSC Germany Elmar Seizinger
Page 4		Great!	None	Thank you	FSC Sweden Lina Bergström/ Eva Mattsson
Page 4		RA in complete agreement to de-link from direct connection to ISO, and also to follow ISEAL allowance of alternative assurance systems that better fit the scheme.		Thank you	Rainforest Alliance Alison Lesure, Laura Terrall
Page 4	G	Very confusing and needs to be rephrased. The way it is written now, the paragraphs contradict each other. How is FSC still compatible with ISO 17065 when they've chosen to remove certain ISO requirements? Do CBs not need to reference any ISO standards anymore?		It is stated that FSC aims to achieve compatibility (on a principle level), but still explored options in the first draft, whether or not to deviate on a few specific issues. The second draft should be clear.	SCS Global Services Vanessa Ellis
Página 4	G	Información sobre la conformidad con el Código de Aseguramiento de ISEAL (compatibilidad con ISO 17065) De acuerdo OK		Ok	CMPC Augusto Robert
Page 5	G	RA agrees with 12 month transition for CB's to come		Ok	Rainforest

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		into conformance.			Alliance Alison Lesure, Laura Terrall
Page 5		Proposal for transition time Probably OK, it is difficult for us to foresee what kind of difficulties there will be for the CBs.	None	Ok	FSC Sweden Lina Bergström/ Eva Mattsson
Page 4 Proposal for transition time		Agree that CBs will need at least 1 year transition time to make some of significant changes in standard (eg Auditor training, comments below). This needs to be clarified in the standard	Clarify either by making effective date 1 Jan 2017 or by adding Transition date	ASI will issue guidance on how to transition to the new version of the standard. The second draft includes a consultation note which provides background details.	Soil Association Woodmark Meriel Robson
Page 5		Agreed, required changes require time, I would have however recommend that the start of the evaluation will start with 6 months So if non-conformities are observed there is still appropriate time to adjust before the CB's lose their " licence to operate"	6 (six) month after the effective date ASI will start assessing the certification bodies against the revised standard.	The approach of having a 12 months transition period is kept, please see details in the consultation note.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 5	G	The transition time of a year is very much appreciated. It needs to be clarified how this affects those CBs undergoing re-accreditation audits in 2016.		Re-accreditation needs to be done based on the new standard version.	SCS Global Services Vanessa Ellis
Page 5		It is unclear why CBs have to be given 1 year to adapt their systems as the standard will no longer require conformity with ISO 17065, but the standard itself is conform the ISO standard.		Assuming that the FSC standard achieves full compatibility with the ISO standard it will not make any difference whether external	WWF International

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				conformity with ISO 17065 is required or not. It will take CBs time to adapt their systems, and train their auditors according to the revised requirements.	
Página 5	G	Propuesta para el calendario de transición Estamos de acuerdo con las fechas propuestas de transición. We are ok with the proposed transition dates.		OK	CMPC Augusto Robert
Page 5 List of references	T	Fine to include ISO 19011 as reference for best practice auditing but I thought any requirement from ISO 19011 which was going to be considered an actual <u>requirement</u> under FSC was going to be incorporated into the standard. Note comment during webinar that reference to ISO 19011 is removed from 17021 new version?	My current interpretation is that since ISO 19011 is a referenced guideline only, CBs do not have to comply with all ISO 19011 requirements, and ASI could not raise CARs on the basis of this alone	ISO 19011 is referenced in the draft a couple of times. Only these direct references in the requirements are relevant for conformity, not the list of references.	Soil Association Woodmark Meriel Robson
N/A	G	Top management A definition for what is intended by “top management” should be included since it is used throughout the standard. This is particularly important for large CBs that may have senior management within its unit managing certification, but also senior management of the organization as a whole.		Ok, a definition is included. The intent of the requirements is to refer to the senior management of the entire organization, not the unit managing certification.	Rainforest Alliance Alison Lesure, Laura Terrall
Definitions	E	Use the same definitions as in the IGI for example. for the certified entity. In this document it is called “client”, “certificate holder”, “organisation”, forest management enterprise, and one or two more names, use one! This is confusing especially for new readers. Another wording used with variation is “this standard”, “FSC Certification requirements” and other references to FSC Standards and Certification documents where it is felt that the use is not so stringent. Related applicable requirements is another wording. It is very smart to lift in the definitions of shall and	Use the definitions of the IGI. Use only one term for one thing	Some deviation is needed for the accreditation standard (the IGI are certification requirements). The key word to refer to certificate holders is client, but in a few cases it is clearer to refer to certificate holder. The standard was screened to ensure consistency with terminology, e.g. when referring to documents of the FSC normative framework, but some	FSC Sweden Lina Bergström/ Eva Mattsson

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		should – many mix them, especially when not having English as a first language.		variation is needed depending on the context (since the terms used are not synonyms).	
Definition of “Auditor”	T	“ a person with competence necessary to conduct an evaluation” Why not "audit" instead of “evaluation”? I understand that this implies that peer reviewers and certification decision-makers, must be qualified as auditors, but this is stated in a specific standard requirement, and in this definition "evaluation" should be substituted by "audit" for clarity’s sake.	Substitute "evaluation" by "audit"	The word evaluation is replaced by audit.	Capital Natural Ana Dahlin
Definition of “Team leader”	T	Why do we need this concept at all? You only mention it in 3.1.2 and one requirement of Annex 2, and do not specify minimum competence requirements, nor explain why such a person might be necessary. In what way is such a person different from a lead auditor? I know very few CBs actually separate these 2 concepts. NOTE: In the ISO world there is only the term „auditor“ and „audit team leader“ – ie, no „lead auditor“. The term „audit team leader“ designates the auditor who is appointed to lead the team. It is not a synonym for audit „secretary“, ie for someone who only organizes audit logistics. The „audit team leader“ is always an auditor, and thus fully trained and qualified as an auditor. The difference is that s/he is also coordinating the team (besides doing the rest of the normal auditor tasks). (See definition 3.9 of ISO 19011 of audit team: „one or more auditors conducting an audit, supported if needed by technical experts. One auditor of the audit team is appointed as the audit team leader“ and also requirements 9.1 to 9.1.12 of ISO/IEC Standard 17021:2011). Thus the FSC concept of “lead auditor“ is equivalent to the ISO concept of „audit team leader“. Consequently, FSC should choose one term only, given they are synonyms.	Eliminate team leader or lead auditor, and use only one of the concepts.	The term lead auditor is eliminated. In the document there will only be “auditors” which are the persons auditing against FSC schemes As in ISO docs (19011/ 17021) there will only be an audit team leader – who must be an auditor.	Capital Natural Ana Dahlin

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Terms and Definitions; p. 6 and p. 8	E	The definition of an auditor and lead auditor should include that they are not only competent but also qualified. I.e., you can be competent as defined in the standard but still not meet the requirements to be a FSC auditor.	Suggested definitions: Auditor: a person with competence and qualifications necessary to conduct an evaluation. Lead auditor: a person with competence and qualifications necessary to conduct an evaluation and to be the content leader of the audit team.	See above.	Rainforest Alliance Alison Lesure, Laura Terrall
Pg 6 - E Terms and definitions	T	Application reviewer: the person(s) who check(s) if an applicant for certification is ready and prepared for an audit. This person also selects the auditor and the audit team.	The requirement for this person means that this must be a qualified auditor and records must be maintained for reviewers with their qualification.	The wording in the revised document allows the audit review to be done by one or a number of persons. No specification made if whether this person must be an auditor.	SGS South Africa Gerrit Marais
E Terms and Definitions	T	Definition of 'Application Reviewer' This definition presupposes the processes and allocation of responsibilities within the CB. The functions described may be conducted by different people at different times	Better to define 'Application Review' as a function (in line with 17021 principles) – including as appropriate the defined sub-functions.	Application review is defined as function that can be done by one or more than one person. Definition of tasks that need to be done with no requirements for qualification.	SGS Christian Kobel
Definition of Application reviewer	G	There should be some flexibility as to whether this person also selects the auditor and audit team	Change "This person also selects" to "this person also may select"	No specification any longer about who selects the audit team	SCS Global Services Vanessa Ellis
Página 9	T	Definition application reviewer Revisor de la solicitud:	No es el líder del equipo? O un administrativo de la EC?, como define esa persona cuando una aspirante está listo, si no hay pre evaluaciones obligatorias. This is not the lead auditor? Or an administrative person of the CB? How do you name the person when a candidate is ready, if there are no	The wording in the revised document allows the audit review to be done by one or a number of persons. No specification made if whether this person must be an auditor.	CMPC Augusto Robert

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			mandatory pre-evaluations.		
E - Terms and definitions: "Certification decision maker"	G	To avoid a conflict of interest the certification decision maker should be no external personal. So this should be part of the definition.	the person(s) who takes the final decision if an applicant is certified, an existing certificate is extended or a withdrawn certificate is re-issued and who is employee of the CB"	Clear and unambiguous wording in the revised STD doc that the certification decision maker must be employed by the CB.	Tuev Nord Carsten Kahlert/ Martin Barnack
E Terms and Definitions and 1.2.1.2	T	'Certification decision Maker' is specially defined as a person, however 1.2.1.1 allows his function to be made by an individual or group.	Change to define Certification Decision as a function rather than as an individual (aligned with 17021 thinking)	The term certification decision making entity is used in the definition (in alignment with the use in the standard), which clarifies that the certification decision can be taken by one or more than one person/ group.	SGS Christian Kobel
Terms and Definitions	T	The definitions of "Certificate decision" and "certification decision maker" needs to be streamlined. Add decision on CARs.	Streamline the two definitions with each other.	The definitions have been streamlined.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 6	E	Definition of 'cert decision maker' "existing certificate is extended" is not clear.	Suggest to make this "existing certificate is maintained " to be clear it is about any point in time where the CB evaluates continued conformance and shall maintain its valid certificate.	Amended accordingly in the draft 2 version.	Rainforest Alliance Alison Lesure, Laura Terrall
Glossary		The definition of a PEER REVIEWER is not in line with the standard itself. (see 4.4.4 d)	Adopt Glossary or delete 4.4.4.d, We assume that an internal Auditor as mentioned in the Glossary is an employee of a CB.	Amended accordingly to have it consistent across the whole document	GFA Matthias Rau
Terms and Definitions, p. 8	T	Definition of "peer reviewer" Peer reviewer is only used in this standard in the context of conducting independent peer reviews of FM main assessment reports. The definition provided on page 8 is contradictory to the requirements specified in section 4.4 (d) which require that report peer reviewers	Revise definition to be consistent with normative requirements defined in section 4.4 (d). Suggested definition: Peer reviewer: an internal or external,	Yes, a peer reviewer must be external. Amended accordingly in the revised version.	Rainforest Alliance Alison Lesure, Laura Terrall

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		be completely independent of the CB (not be internal CB auditor). Defining the peer reviewer as an “Auditor” should not be part of the definition since this will imply the individual shall be qualified as an FSC auditor.	auditor qualified individual (i.e., shall not be an employee of the certification body) reviewing an audit report provided by the lead auditor. NOTE: the peer reviewer does not need to be qualified as an auditor.		
Página 8	T	Definition certification decision maker Encargado de la toma de decisión de la certificación:	Es el Auditor Jefe? Is it the lead auditor?	No, a separate entity (an individual person, persons or group) takes the certification decision, not the lead auditor.	CMPC Augusto Robert
Definition of Certification decision maker	G	A certificate which is re-issued after being withdrawn may not always be a certification decision – for example, if a certificate is withdrawn due to non-payment and then the CH pays the bill.		The clause was amended.	SCS Global Services Vanessa Ellis
Definition of Certification Body	G	The standard is lacking a definition of “certification body”; this is especially noticeable now that “subcontractor” includes sister companies and subsidiaries. Several parts of the standard would be more easily interpretable with a definition of CB.	Include a definition of CB.	The added value is not clear. The CB is the accredited entity.	SCS Global Services Vanessa Ellis
Definition of Complaint	E	Definitions should not include requirements; the definition for Complaint includes instructions for how complaints are to be documented. This is not consistent with a definition.	Rephrase “a complaint needs to include” to “a compliant includes”	Ok, amended.	SCS Global Services Vanessa Ellis
Terms and Definitions	T	Complaint. Would probably be good to add FSC activities also for the clients, now it is possible to complain about all activities by the clients. Isn't in possible to make anonymous complaints?	Add “FSC” activities of the client Include anonymous complaints.	Yes, amended. Anonymous complaints are treated as stakeholder comments.	FSC Sweden Lina Bergström/ Eva Mattsson
Página 9	T	Definition complaint Queja	Estamos muy de acuerdo, esto permite claridad en que quejas deben ser tratadas y cuáles no, todas deben de ahora tener identificación del	Thank you	CMPC Augusto Robert

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			querellante. We strongly agree, this provides clarity about what shall be treated as a complaint and what not. All must now be identified by the complainant.		
Terms and Definitions	T	Days, business days is used much more frequent. Use only business days everywhere!	Use only business days everywhere!	The definition was amended to refer to business days rather than calendar days, as there are more references to business days.	FSC Sweden Lina Bergström/ Eva Mattsson
Terms and Definitions	E	License agreement... parts of the definition is also in the criteria text, take away at one of the places.	Parts of the definition are also in the criteria text, take away at one of the places.	The definition is not repeated in the text. All references to the License Agreement were cross checked with the legal department to see whether anything is redundant.	FSC Sweden Lina Bergström/ Eva Mattsson
Definition of "Audit team"	T	Your definition of "qualification" (further on) does not help one in interpreting what is meant as a "qualified lead auditor". Your definition of "qualification" is limited to academic qualification, when here the word is used for the process that results in the decision that a person is competent to lead an audit team, and which is based on various sources of information (academic qualification but also experience, training, # of audits performed, etc.). The definition of qualification is also not aligned with the way it is used in section 3.1.	Improve the definition of qualification.	Definition is taken out because it led to too many misunderstandings. Clear wording now applied throughout the STD that is unambiguous and commonly understood in the same way.	Capital Natural Ana Dahlin
Terms and Definitions	T	Qualification, this is a narrow definition. Take away or rewrite!	Rewrite the definition on qualification	See above	FSC Sweden Lina Bergström/ Eva Mattsson
Definition of Qualification	G	The definition for Qualification is highly restrictive and may disqualify auditors in countries or regions where no degree-granting institution exists. Moreover, training and experience that do not result in the awarding of a degree also lead to Qualifications. For example, ISO and OSHAS do not award degrees, but	A more flexible definition for Qualification should be used.	See above	SCS Global Services Vanessa Ellis

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		are later cited as Qualifications that auditors must have. Finally, even those institutions which grant degrees do not always include exams as part of the requirements.			
Page 8	E	Definition of 'qualification' Do not agree with qualification being limited to an educational degree	Qualification should cover the full set of items and areas that an individual must have fulfilled to be qualified as an auditor, including experience.	See above	Rainforest Alliance Alison Lesure, Laura Terrall
Page 8 Section E Terms & Definition	T	Qualification definition – 'degree' is very limiting and restrictive. Should say something like 'examination in order to be granted a formal status'?	Qualification - an education that is concluded by examination(s) in order to be granted a formal status	See above	BM Trada John Lovelock
Terms and Definitions	T	Technical expert – why only CoC?	Take away chain of custody.	Has been amended.	FSC Sweden Lina Bergström/ Eva Mattsson
Página 8	T	Definition Team leader Líder del equipo:	NOTA: El líder del equipo no tienen que ser necesariamente auditor. NOTE: A team leader does not necessarily need to be an auditor.	According to the revised definitions we have an auditor and an audit team leader. The audit team leader needs to be an auditor.	CMPC Augusto Robert
Terms and Definitions	E	Impartiality. Incorporate note 1 in the definition and take away note 2.	Incorporate note 1 in the definition and take away note 2.	Amended as suggested.	FSC Sweden Lina Bergström/ Eva Mattsson
Definitions – Conflict of Interest	T	Current lack of clarity and contradicting interpretations of NOTE – eg. Conflict of interest =developing manuals. In webinars was confirmed that CBs may develop generic templates / manuals or eg. examples of Material Accounting Records etc , as long as these are fictional and not specific for company they are auditing	Need to clarify NOTE	A new Annex was developed on avoidance of conflict of interest (Annex 1), which provides clarification what is considered acceptable and what not.	Soil Association Woodmark Meriel Robson

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Terms and Definitions	T	Conflict of interest could be made wider to also include when there is a risk for a biased treatment because of friendship, the client is famous, important etc. It is no gain in those relations but a risk for the person or a loss!	Make the definition of conflict of interest wider to cover more areas for risk of biased decisions.	See above	FSC Sweden Lina Bergström/ Eva Mattsson
Terms and Definitions	E	Consultancy Note 2 The text is important, lift it up to normal definition text!	Make note 2 to “normal” definition text.	Agreed, the note was lifted to clause 1.1 of Annex 1.	FSC Sweden Lina Bergström/ Eva Mattsson
Definition of Conflict of interest	G	While having a definition for Conflict of Interest (COI) is good, it may provide stakeholders critical of FSC’s use of certification bodies (especially those who are for-profit) with reason to allege COI for any type of auditing activity. Additionally, the note states that “templates for certification clients” constitute COI; however, this is too broad. For example, there are several areas of the standards, such as 40-005, Annex 2 risk assessments, where the requirements themselves can be organized into a table which helps the client address the requirements in an orderly fashion, but which does not provide content other than the requirements themselves. These types of templates should be acceptable.	Enhance the guidance note for COI with a phrase such as “conducting audit and receiving payment in and of itself alone does not constitute COI.” Allow for some types of templates	An Annex was developed to provide clarity on avoidance of conflict of interest.	SCS Global Services Vanessa Ellis
	T	Is some clarification still required re Conflict of Interest in CW? Some CBs are currently carrying out the Annex 3 evaluation on behalf of client, and then auditing this. This I think is clear that not permitted. However situation for auditors and Subcontractors is not clear.	I would say that a <u>freelance</u> auditor who does the Annex 3 evaluation for a company and also from time to time does audits for other companies for the CB should be able to do this, as long as the CB doesn’t use him/her as the auditor for that particular company. Same with Subcontractors, as is suggested in clause 1.4.9	The standard FSC-STD-20-001 provides the generic requirements for COI at organizational level and auditor level, but details still need to be specified in the CW standards directly.	Soil Association Woodmark Meriel Robson
E - Terms and	G	We think if a CB is performing training, then he has a conflict of interest if also the audit is performed by the same CB because then the Auditor is auditing his own	Arranging training and participating as a trainer is also considered consultancy.	This would mean that FSC is stricter than ISO 17021, from where the NOTE 1 was taken. It	Tuev Nord Carsten

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definition s: Consultancy –Note 1		work (the work of the own CB). So training means a conflict of interest and should be part of consultancy. It is impossible to separate between training and consultancy, so both should be forbidden for the CB, who is auditing the client. See also 1.4.4		was agreed to provide specific guidance about what is allowed and not allowed in the new Annex 1 on avoidance of conflict of interest.	Kahlert/ Martin Barnack
Glossary	T	Providing training also means providing training material that include explanation and sample documents. Therefore it would be good to include the words “training documents and sample documents” in the note 1 to eliminate misunderstanding.	NOTE 1: Arranging training, providing sample documents and participating as a trainer is not considered consultancy, provided that, where the course relates to management systems or auditing, it is confined to the provision of generic information that is freely available in the public domain; i.e. the trainer should not provide company-specific solutions.	The new Annex 1 provides specification about training material.	GFA Matthias Rau
“References”, Definition of Conflict of Interest, NOTE page 7, line 5	T	Templates can be developed by CBs to help interpreting the requirements. For example, CB may develop the template for volume summary or Controlled wood risk assessment or product group list. It is not developing the client management system, it is explaining the standard requirement by giving example. Moreover, if such templates are publicly available to all certified companies, e.g. uploaded to the CB website, it is in line with ISEAL Assurance Code 6.2.1 “However, knowledge sharing as part of the assessment process is also a form of risk mitigation, because informed clients are more likely to follow the standard if they understand it. Rather than prohibit this activity, which can be beneficial for all parties, standards system owners need to ensure advice provided to clients is accurate and is available to all clients in a consistent fashion. This way, there is less opportunity for one client to be favoured over another.”	“and templates” should be deleted. The note should be worded according to ISEAL Assurance Code 6.2.1 meaning.	It was agreed to provide specific guidance about what is allowed and not allowed in the new Annex 1 on avoidance of conflict of interest. The definition was also amended.	NEPCon Tigran Martirosyan

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Page 7 Note 2		Agreed, there have been cases where Certification bodies have made recommendations.		See above	WWF International
Definition of Subcontractor	G	The Note under this definition states that “Persons working under an individual contract ... under the authority and direct control of the certification body are not deemed to be subcontractors” This excludes those individual contract auditors working for subcontractors.	The note should be broadened to allow for subcontractors to be able to use contractors/ personnel under their own direct control.	The definition for subcontractor is eliminated.	SCS Global Services Vanessa Ellis
E Terms and Definitions	G	For organisations with multiple sites linked by ownership and under control of a central office, the term “Subcontracting” is not correct. It is also not in line with ISO definitions. It should be considered that the Control by Ownership has a much higher value for implementing and control than just a sub-contract between two independent legal entities. Therefore we suggest to revise the definition of the “Subcontractor” (or keep the previous definition). Therewith section 3.2 of this standard would not apply for CABs with multiple sites and control by ownership. Other clauses of this standard sufficiently cover the requirements for CABs with multiple sites and control by ownership. We see a challenge for ASI to audit Multisite Organisation, but the suggested change of the definition of “subcontractors” will not help. We propose to develop a customised Audit planning for multisites. The ASI Lead Auditor shall consider the share of responsibilities within the CAB (central and local offices) which is most probably differed from cases to case. The ASI Lead Auditor shall instruct the ASI auditor of the local offices audits what shall assessed on local level. This would not need any new requirements but different management by ASI:	Change definition of Subcontractors and exclude CAB with multiple sites and with control by ownership.	The definition for subcontractor is eliminated and the section renamed to “outsourcing”. Bodies providing outsourced services are separate legal entities (separate from the accredited certification body entity). For CBs with multiple sites this may mean that some outsourcing requirements are more easily conformed to.	SGS Christian Kobel
Página 9	T	Definition subcontractor	No se entiende esta definición	The definition for subcontractor is eliminated and the section	CMPC

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		Subcontratista	The definition is unclear.	renamed to “outsourcing”. Bodies providing outsourced services are separate legal entities (separate from the accredited certification body entity).	Augusto Robert
Terms and Definitions	T	Surveillance. This is very difficult to understand, please reformulate	Please reformulate surveillance.	This is an established definition, used also in other FSC normative documents (comes from a ISO 17000 definition, adapted to FSC).	FSC Sweden Lina Bergström/ Eva Mattsson
Terms and Definitions	E	Termination and withdrawal – why are they so differently formulated? They are different occasions but language could be more similar.	Streamline language.	These are established definitions. It is not clear how the language could be more streamlined as they capture two different topics (certification agreement / certification).	FSC Sweden Lina Bergström/ Eva Mattsson
Pg 7 Types of Evaluations	T	Should Extension of scope and closing of findings evaluations not be included		The wording was amended and aligned with the definition included in the new FSC-STD-20-011.	SGS South Africa Gerrit Marais
Pg 8	T	Licence agreement now includes the confirmation of the Policy of association.	Therefore there is no need to sign Annex B of the Poly? This is not clarified in the document.	The details of what is contained in the license agreement are not specified in this standard.	SGS South Africa Gerrit Marais
Page 10		Map Good overview, disputes and interpretations could be included.	Disputes and interpretations could be included.	The map was changed to only refer to accreditation standards.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 10 Mandatory Combination	G	It is not clear that this row is stating that COC must always be combined with FM in an accreditation scope.	Change “mandatory combination” to “required scope extension”	This seems to be ok for most stakeholders and is additionally explained in clause 1.1.1.	SCS Global Services Vanessa Ellis
Proposal	G	This makes sense. CW is always a subset of either FM		The intent is that CW would be a	SCS Global

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
for accreditation scope		or COC and can never be a stand-alone scope. Therefore, if a CB is accredited for either FM or COC, they can choose to also offer CW but it is not necessary to make CW a separate scope. It is also less confusing because most stakeholders think of CW as an extension of either FM or COC.		"mandatory" accreditation scope of FM and COC (not optional) as CW would be integrated in FM and COC.	Services Vanessa Ellis
Page 11	T	Proposal for accreditation scope – COC only CBs and CW There are some CBs currently who do COC only. Agree that a COC-only accredited CB would not be able to do Annex 2 or 3 CW audits however in the situation where a company is buying material which is sold as CW already, it is fairly straightforward for a CB to audit in terms of COC	Allow COC-only CBs to also audit companies to relevant section of CW standard if company is buying in already CW certified material only.	Yes, this is meant to be allowed. The proposal is also that COC only accredited CBs would be allowed to conduct CW COC audits, if sufficient auditor expertise is ensured.	Soil Association Woodmark Meriel Robson
Page 11 1.1 Accreditation Scope	T	CW is not always an integral part of FM, despite it is being lobbied as such by FM-accredited CBs. It is necessary to have COC/CW option to cover COC audits in clients with FSC CW Verification Programme. Otherwise FSC discriminates COC-only CBs from doing such COC/CW audits and set up the standard in favour to FM-accredited CBs.	Remain existing CW category separate. Simplification is not necessary in this case.	COC CW is proposed to be integrated in COC scope. FM scope would not be needed to make COC/CW evaluations (only for FM/CW).	BM Trada John Lovelock
Page 11		Proposal for accreditation scope Good		Thank you	FSC Germany Elmar Seizinger
1.1.1	T	It would be helpful to mention the standards that are applicable for each accreditation scope. The stakeholder note is not correct: The current 20-001 already defines CW FM evaluation under the general FM accreditation scope. So is currently is two! It is simply the current ASI accreditation application that is not giving the right scope definition. All old FSC and ASI procedures only define two	a) the accreditation scope includes forest management and chain of custody certification (FSC-STD-20-002, 20-006, 20-007, 20-012); b) The accreditation scope includes chain of custody certification (FSC-STD 20-011) only.	Rather than listing generic and scope specific accreditation standards, a reference to the standard map is made.	GFA Matthias Rau

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		different possible scopes FM (incl. CW) and COC.			
Page 11	G	RA agrees with proposal for accreditation scope.		Thank you	Rainforest Alliance Alison Lesure, Laura Terrall
1.1.1	G	the reduction to only 2 options makes things more clear, we support this idea.		Thank you	Tuev Nord Carsten Kahlert/ Martin Barnack
Page 11		I don't understand the need for this change, the requirements for CW, FM and COC are not the same. Why don't we say so that a certification body can have a scope of accreditation for Control Wood, FM or COC. If the certificate holder want to use different CB's for FM and COC that is allowed. Different CB's for CW and FM is allowed and only COC is allowed. Whether this also a commercial option for a CB is their decision	the accreditation scope includes A forest management B: Chain of custody certification C: Controlled Wood D any combination of the above	The clause does not restrict certificate holder's choices of CB (but rather provides an opportunity to take the same CB for both FM and COC). The only change introduced here is the clarification that CW for FSC is not a stand-alone accreditation scope, it is only one part of either COC or FM.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 11		Scope should clearly cover project certification	Scope should clearly cover project certification	Project certification is clearly part of the COC accreditation scope, but currently there are no specific project certification accreditation requirements.	FSC UK Rosie Teasdale
Page 11		Good Change the note in 1.1.1 to criteria text.	Change the note in 1.1.1 to criteria text.	This note is kept.	FSC Sweden Lina Bergström/ Eva Mattsson
Página 11 1.1.1	T	1.1.1.- Alcance de la acreditación ; De acuerdo con la propuesta, 2 alcances MF+COC y COC 1.1.1 Scope of accreditation; I'm ok with the proposal of 2 scopes FM + COC and COC		Ok	CMPC Augusto Robert

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1.1.2	T	If there is a National standard is has to be included in a) or b)	Include National FM standards in a) or b)	A direct reference to national standards is not needed (cross references exist in the scope specific standard FSC-STD-20-007).	FSC Sweden Lina Bergström/ Eva Mattsson
Página 12 1.1.2	E	1.1.2.- Entidad juridical Legal entity	No se entiende la definición y no está en Términos y Definiciones The term is unclear and it is not included in the terms and definitions.	This was already an established term under ISO Guide 65 and should be clear to certification bodies. A legal entity means an association, corporation, partnership, proprietorship, trust, or individual that has legal standing in the eyes of law. A legal entity has legal capacity to enter into agreements or contracts, assume obligations, incur and pay debts, sue and be sued in its own right, and to be held responsible for its actions.	CMPC Augusto Robert
1.2.1.2	E	Legal entity The note fits better as a definition	Move the text of the note to definition.	The note is deleted as it is redundant with the definition of certification decision.	FSC Sweden Lina Bergström/ Eva Mattsson
Clause 1.2.1.2	T	The requirement for defining the entity that makes certification decisions seems misplaced. Is it under "Legal Entity" because that person/ group has the legal responsibility for their certification decisions? If so, that is not likely something any individual would be willing to take on.	Move 1.2.1.2	This requirement is deleted because it is redundant with Clause 4.5.2.	SCS Global Services Vanessa Ellis
1.2.2.1	T	What bout the time before the evaluation as the pre-evaluation? That needs a contract as well.	?	This is left to the discretion of CBs.	FSC Sweden Lina Bergström/ Eva Mattsson

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
1.2.2.2	E/T	This is probably the worst structured page of the whole document. Divide in different paragraphs/ clauses make lists if there are many issues. Maybe make one simple list of what the contract shall contain, and then an explanation what all this means and what the client have to do. Now it is a mixture b) Is this also for a continuous contract with a client and there are minor NCs? c) Can be formulated clearer and consiser d) Write what Clause 1.6.3 means, now it is not understandable e) This is very hard to read, reformulate. In iii please describe what is meant. f) Reword h) ii change “advise those customers” to inform. The note is unclear, please rewrite. Generally for withdrawal of the certificate it would be possible to request changes and information on the webpage of the client as well i) ii Don't think this is realistic. Some thousand of books spread over a thousand of retailers. j) Ipso facto – take away, it is better without Latin in these kind of documents! n) Why using the term infringements p) Divide text into two or three clauses. q) Make the list of possible reasons for complications longer. The GA seminar on certification in high-risk areas is a good source.	Please check the comments, there are several proposals for changes.	The revised Clause 1.2.3 has been amended, restructured and shortened, where possible.	FSC Sweden Lina Bergström/ Eva Mattsson
1.2.2.2	G	is too much detailed; conform with all applicable certification requirements” contains already f), g), l), m), o) and p).		See above	Tuev Nord Carsten Kahlert/ Martin Barnack
Page 11		Section 1.2.2.2 - could language be added that ensures agreements with CHs are in place to publish public summary reports regardless of outcomes.		The following safeguards have been added: 1.2.3d) specification that audit shall take place at the required	M-env Greenpeace Judy

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		Also, it is not clear procedurally how a suspension etc becomes effective. e.g the need for the public summary report to be published. this should be clarified here.		intervals. 1.2.3g) FSC's dispute resolution process shall be followed. Clause 4.7.4 and 4.7.5 on suspensions.	Rodrigues/ Catherine Grant
Page 12, 1.2.2.2	G	Missing requirement that the client follow the dispute resolution process when the certification decisions is considered unacceptable.	Include a requirement for the certification agreement to include a clause mandating that the dispute resolution process be implemented when the CB certification decision is considered unacceptable, except in cases when the client chooses to leave the FSC system. Essentially, the CB and FSC need to be protected against client lawsuits as a means to appeal cert decisions.	Clause 1.2.3g) was added, specifying that FSC's dispute resolution process shall be followed.	Rainforest Alliance Alison Lesure, Laura Terrall
Page 12, 1.2.2.2.b	G	Does the language ultimately require that the client shall close all conditions and corrective actions prior to issuance of the certificate?	This would be a major change in the FSC system and should be highlighted for consultation. Requiring closure of minor nonconformities before certification will add significant challenges to the process.	The original wording of the clause has been brought back, which is more generic. A different clause specifies that major nonconformities shall be corrected before certification may be granted.	Rainforest Alliance Alison Lesure, Laura Terrall
Page 12, 1.2.2.2.b	E	Conditions and corrective action are not defined in the glossary.	Add definitions to 20-001 or 01-002. Consider using "non-conformity" rather than condition.	Conditions is a more generic term which may cover additional requirements specified by the CB.	Rainforest Alliance Alison Lesure, Laura Terrall
1.2.2.2.d	T	This clause states, "agree to the inclusion of a clause in reference to Clause 1.6.3". This is confusing and should not require that the agreement requires the client to agree to the inclusion of a clause. Rather, the agreement should include the clause itself. The client agrees to all clauses by signing the agreement.	Rephrase to a) state what the actual clause is, even if it also references Clause 1.6.3, and b) not require that the client agree to the inclusion of something, but just state what should be included.	The clause has been amended.	SCS Global Services Vanessa Ellis
p. 13,	E	First word in these clauses does not use proper		The wording has been	Rainforest

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
1.2.2.2.f,g,h,i,n and o		grammar. For example, 1.2.2.2.o could be revised to “Acknowledge the title of”		amended.	Alliance Alison Lesure, Laura Terrall
Page 12 1.2.2.2f)		Is this not contradicted by 4.1.5 proposing that information on applicants is publicly displayed in the FSC webpage	Is this not contradicted by 4.1.5 proposing that information on applicants is publicly displayed in the FSC webpage	There is no contraction, because 4.1.5 is not about making claims about certification, but providing basic information on the applicant that may be interesting for stakeholders to be aware of.	FSC UK Rosie Teasdale
Page 12, 1.2.2.2.f	E		Should begin “ensure” not ‘making’.	This clause is proposed to be removed, because it is redundant with a)	Rainforest Alliance Alison Lesure, Laura Terrall
1.2.2.2 (h) (ii) Note; p.12	T	RA agrees that “relevant” customers include those that have bought certified material or placed an order for certified products; however, relevant customers should exclude those that have placed an enquiry or otherwise expressed interest in purchasing certified products as it is not possible to evaluate.	Recommend revising the language to read the following: NOTE: Certified and uncertified clients are considered “relevant” customers, if they bought certified material, or placed an order for certified products within the last 12 months or submitted an enquiry for certified products, or otherwise expressed an interest in purchasing certified products.	The note (interpretation) is proposed to be removed.	Rainforest Alliance Alison Lesure, Laura Terrall
1.2.2.2.h	T	Given that Clause 1.3.11 states that the certificate may only be reinstated after conditions in 1.2.2.2.h are met, 1.2.2.2.h should be rephrased. Currently, it states that suspended CHs must “immediately” cease using FSC trademarks and inform their customers “within three business days” that they are suspended. If a CH does remove all FCS trademarks and inform their customers, but these activities are done after five business days, for example, this will mean they are no longer eligible to have their certificate reinstated, per Clause 1.3.11.	Extend the timelines to achieve these tasks and allow for the reinstatement of a certificate even if the tasks were completed outside the required timeframe (in Clause 1.3.11).	This is an established Clause. An extension of the timeline was not supported and no specification of what “immediate” means.	SCS Global Services Vanessa Ellis

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		Additionally, “immediately” is not auditable nor is it very achievable. What does it actually mean? There must be lag time allowed for the CH to identify all uses of the FSC trademarks, remove them on websites (which sometimes means hiring an outsourcer), and recall all promotional materials from all participating sites, if necessary.			
1.2.2.2.h NOTE	T	The Note states that “relevant customers” includes those who “placed an order or submitted an enquiry for certified products, or otherwise expressed an interest in purchasing certified products”. This is very broad, and many companies do not track these types of enquiries or potential customers. Suspended CHs should not be required to contact these categories of “relevant customers”.	Remove this part of the Note. Alternatively, if this is left in 20-001, there must be an equivalent requirement in 40-004 which requires that these types of “relevant customers” are tracked. Otherwise, in practice suspended CHs will not likely be able to conform to this requirement.	The note (interpretation) is proposed to be removed.	SCS Global Services Vanessa Ellis
Página 13 y 14 1.2.2.2h)	T	Se considera muy amplio el cliente pertinente, debiese ser solo a quienes hayan comprado material certificado o hayan colocado pedidos. The relevant client is very broad, it ought to be only those who have purchased certified material or have placed orders.		Same as above	CMPC Augusto Robert
1.2.2.2i	T	Is there a need to incorporate latest Advice note here or in 4.5.6 / 7 – ie. require CBs to incorporate into contract with client possibility to suspend if not possible to complete Report	See left	The Advice note has been added as Clause 4.7.4 and 4.7.5	Soil Association Woodmark Meriel Robson
1.2.2.2 k)	G	k) provide printed copies or electronic copies of the certificate in its entirety, if copies are provided to others (NEW); This sentence is not understandable. Please revise the wording of this clause.		Deletion of this clause is suggested (to be left to the discretion of CBs). The Clause was originally adapted based on an ISO 17065 clause which specifies: “if the client provides copies of the certification documents to others, the documents shall be	GFA Matthias Rau

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
				reproduced in their entirety or as specified in the certification scheme".	
p. 13, 1.2.2.2.k	T	This new requirement is not clear. Further explanation on the intention of this new requirement needs to be provided. Note language is unclear as well.		Same as above	Rainforest Alliance Alison Lesure, Laura Terrall
Página 14 1.2.2.k)	E	No se entiende redacción It is not clear what the writing means.		Same as above	CMPC Augusto Robert
Page 13	T/E	There is no timeframe specified for the period the CH has to keep and provide records of complaints in relation to the certification requirements since 5 years prior to certification is a justifiable period we recommend to introduce that period here also	P) For a period of a least 5 (five) years prior to the certification keep a record of all complaints made known to it relating to conformity with the certification requirements and makes these records available to the certification body when requested, and;	Certification requirements specify the following: FSC-STD-40-004 requires CH to keep records for 5 years (but of course not prior to certification). It is not possible to enforce that records are kept prior to certification.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
clause 1.2.2.2 (q);	E	Recommend that this clause is more specific with the timeframe within which a client must inform the CB of changes.	Recommend revising the language to read the following: q) inform the certification body, without delay, within 5 business days of changes in the ownership, structure of the organization, management systems or circumstances which relate to the implementation of FSC certification requirements.	Amended as proposed.	Rainforest Alliance Alison Lesure, Laura Terrall
Page 13 1.2.2.3	T	This is very impractical to implement. FSC normative documents are in a constant state of update, new versions all the time, plus the new versions of Advice notes etc. Contracts signed 5 years previously will therefore reference older versions. Constantly	Suggestion delete "...in most recent version"- require certification agreements to refer to "all relevant and effective FSC Normative documents, rules and regulations, as updated from	Considering legal advice the reference to the most recent version needs to be kept.	Soil Association Woodmark Meriel Robson

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		renewing contracts is simply impractical	time to time”		
Page 14 Clause 1.2.3	T	Roll out self-approval process for all countries.	Roll out self-approval process for all countries.	Ok, this is not within the scope of this revision process.	BM Trada John Lovelock
1.2.3.1	E	Why using FSC AC when defined otherwise?	Change to FSC	Yes, amended.	FSC Sweden Lina Bergström/ Eva Mattsson
1.2.3.2	T	Hopefully promotional use can be taken away from CB approval and be handled in a simpler way giving more responsibility to the client. This would especially apply for smaller companies.		Ok, this is not within the scope of this revision process.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 14 1.2.3.2	G	Could the CB be obliged to provide advice on trademark use, or at least the grounds for rejection of artwork?	Could the CB be obliged to provide advice on trademark use, or at least the grounds for rejection of artwork?	CBs are not allowed to provide advice. Specifications to this Clause are not feasible within the context of FSC-STD-20-001.	FSC UK Rosie Teasdale
1.2.3.2	T	How does this relate to “self-approving”? Is the delegation to certificate holder still not possible?		No, this is outside the scope of the revision process.	SGS Christian Kobel
1.2.3.3	G	The certification body shall control the FSC trademark use of their clients, both on-product and promotional uses by	Delete is clause as it is already in the accreditation contract.	This specification needs to be captured in the accreditation requirements.	GFA Matthias Rau
1.2.3.3	E	Control – what does that mean? “Detected or reported” – this is not needed, take out	Change wording Take out “Detected or reported”	Wording is kept unchanged. Control encompasses what is specified in the clause: audit of requirements and following up on trademark misuse (when reported or based on actively checking trademark use).	FSC Sweden Lina Bergström/ Eva Mattsson
1.2.3.3 a+ b	g	Delete a and b as these are already in the 20-011 and 20-007 and just blow up the standard.		Generic elements should be kept in FSC-STD-20-001 and redundant elements will be eliminated from FSC-STD-20-	GFA Matthias Rau

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
				011 and FSC-STD-20-007 in the next revision.	
Page 14 1.2.3.3b)	G	No timeframe specified	No timeframe specified	We have to be careful not to become too prescriptive.	FSC UK Rosie Teasdale
1.2.3.4		1.2.3.4 what does suitable action mean? May be worth clarifying.		According to ISO 17065 actions can include "corrective actions, withdrawal of certificate, publication of the transgression and, if necessary, legal action".	M-env Greenpeace Judy Rodrigues/ Catherine Grant
1.2.3.4	G	OK with this , although not sure that clause is required as any such misuse as described would be dealt with through a non-conformity against the standard	Delete clause?	The Clause was deleted.	Soil Association Woodmark Meriel Robson
Requirement 1.2.3.4	T	Suitable action. Vague requirement. When would "suitable action" be more than issuing a minor or major CAR according to the case in question? If that is all, please reformulate, or consider eliminating this requirement, given that verification of compliance with standards is an obvious CB task. If not, please indicate what else should be done.	Reformulate or eliminate the requirement, or indicate what else should be done besides issuing CARs.	See above	Capital Natural Ana Dahlin
Page 14, 1.2.3.4	G	Use of "shall be dealt with by suitable action" in the clause is not clear and may lead to interpretation requests by CBs. It will be best to address this in the standard language directly.	CB shall follow up with client upon finding incorrect use. If correction of the item cannot be made immediately, the CB should issue a non-conformity to the client following normal non-conformance requirements in the standard.	See above	Rainforest Alliance Alison Lesure, Laura Terrall
1.2.3.5	G	Take away the note. Even if we of course would like to only see the FSC logo we have a situation with most of forestry being both FSC and PEFC certified. With this limitation forest owners in not using any of the logos	Take away the note in 1.2.3.5	Following internal consultation the note is kept as a safeguard. This is an established Clause resulting from an earlier GA	FSC Sweden Lina Bergström/

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		and making the FSC less visible. How to use the logo is up to the certified party (if showed correctly). We in FSC have to be better so that forest owners and companies using forest products use the FSC logo and not the PEFC or other logo.		Motion.	Eva Mattsson
PG 14	G	NOTE: If a certification body offers certification services of other forestry conformity assessment schemes, the FSC system and standards shall clearly and accurately be differentiated relative to the other schemes in promotional media and communication to clients according to specific information as provided by FSC.	Can FSC tell CBs how to advertise?	See above. FSC can only regulate on how to communicate about the FSC scheme. This requirement provides the basis for this.	SGS South Africa Gerrit Marais
Page 14 Consultation note on Logo Motion		Agreed		Ok	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 14	T	Agree – simplification of logo rules is needed in the system		Ok	Soil Association Woodmark Meriel Robson
Page 14		From the current formulation it is unclear what baring motion 29 will have on 20-001. acknowledging this is in process it make judging the current draft of the standard from this viewpoint impossible.		This is acknowledged. The Motion is not addressed as part of the FSC-STD-20-001 revision process, but it is not likely that it will affect this standard considerably.	WWF International
Page 14		Simplification of logo standards is very welcome.		Ok	FSC Sweden Lina Bergström/ Eva Mattsson

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Página 14	T	Información sobre la incorporación de la Moción 29 de la AG (Moción del Logotipo) De acuerdo Motion 29 OK		Ok	CMPC Augusto Robert
Page 14 1.3.1	G	Should the Policy for Association be referenced?	Should the Policy for Association be referenced?	The Policy of Association is one element of the License Agreement, so does not need to be referenced separately.	FSC UK Rosie Teasdale
1.3.1	G	It is not clear if older versions of license agreement are acceptable when Re-issuing. Please clarify which version of the License Agreement for the FSC Certification Scheme shall be signed when reissuing a certificate.		Need to check with legal	GFA Matthias Rau
1.3.3	E	Is this really needed?	Take away 1.3.3	It is important to specify this explicitly.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 15	T/E	If I read 1.3.3. correctly the certificate may also be re-issued without re-evaluation. Therefor the word only need to be included. So 1.3..3 would read like this	1.3.3. the certificate may only be re-issued as a result of a re-evaluation.	The intent of the Clause is to specify that a re-evaluation is necessary for re-certification.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
1.3.4	E	Incorporate the notes in the clauses	Incorporate the notes in the clauses	The notes provide additional guidance.	FSC Sweden Lina Bergström/ Eva Mattsson

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
1.3.5	E	Would it not be a need of a reference to FSC standards and other normative documents, not only about the logo?	Check if the clause needs to be expanded to FSC normative documents.	FSC allows timeframes to correct nonconformities, based on c). 1.3.5b) lists the critical types of requirements where conformity is necessary.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 15 1.3.5	G	As above	As above	The Policy of Association is one element of the License Agreement, so does not need to be referenced separately.	FSC UK Rosie Teasdale
1.3.5	T/E	There is no mentioning of the requirement to the CH to provide all relevant information and changes to the CB, many of the labor issue we have seen relate to the fact that the laws changed, that the Collective agreement expired and that the CB was not informed by the CH about these relevant changes	Ad requirement g) provides all relevant information and changes in situations to the Certification body.	This is already covered by 1.2.3j) Additionally CBs are required to consider all national and regional applicable laws and regulations for FM evaluations (FSC-DIR-20-007, Advice 17).	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
1.3.6 b	E	Take away “wording”, what does that mean? Move the footnote to regular text.	Take away “wording” Move the footnote to regular text.	Yes, amended.	FSC Sweden Lina Bergström/ Eva Mattsson
1.3.7	T	Please add the possibility in the FSC Database to allow suspension / termination on a predefined date. Currently the database has to be updated on the date the suspension / termination will take place. This is a tremendous administrative burden.		This feedback will be provided to the persons in charge of the FSC database.	GFA Matthias Rau
1.3.8	T	This is a clause which could be used not only for communicating suspension of certificate, but for many more difficult situations between CB and CH.	Expand the requirement to a wider scope of occasions.	Competence requirements for other CB personnel are specified in section 3.1	FSC Sweden Lina Bergström/ Eva Mattsson
Requirement 1.3.8	T	competence of persons communicating the suspension of certificates It seems odd to add a requirement requesting competence of persons communicating the suspension	Address competence of all personnel involved in the certification process comprehensively and in a uniform manner.	This requirement is taken out because it did not make sense in this way.	Capital Natural Ana Dahlin

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		of certificates to the end of this section, and not to other sections. Shouldn't competence of all personnel involved in the certification process be addressed comprehensively and in a uniform manner?			
1.3.8; p.16	T	This clause should be expanded to refer to those communicating certificate withdrawals, not just certificate suspensions. Also, it is unclear what specific competencies from clause 3.1 individuals fulfilling the administrative function of communicating a certificate suspension to a client shall have to be "competent in their knowledge and understanding of all aspects of handling of suspended certifications." More specificity is requested.		See above.	Rainforest Alliance Alison Lesure, Laura Terrall
1.3.9g)		1.3.9 g) a statement requiring the client to acknowledge receipt of the letter of notification in writing.	what happens if the client refuses to do this? The CB and FSC should have some options in place in case a CH does not follow the standard requirements.	In case the certification was withdrawn it is difficult for FSC / CBs to take action because the former certificate holder is outside of the FSC scope. The important aspect in this clause is that the CBs ensure that the letter of notification is delivered, which is specified in Clause 1.3.10.	M-env Greenpeace Judy Rodrigues/ Catherine Grant
Page 16		Information on source of notification letter clauses Agree		Ok	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 16		Good!		Ok	FSC Sweden Lina Bergström/

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					Eva Mattsson
Page 16 Information on source of notification letter clauses	T	Yes fine. However is 1.3.9g) and 1.3.10 necessary? Once a letter of notification of suspension is given it is often impossible to get any more info from the company. The company is noted as suspended from the FSC db so not sure of need to acknowledge receipt?	Remove clauses?	1.3.9 and 1.3.10 address cases of suspension and withdrawal of certificate, which requires the certificate holder to take certain action. It is important for FSC to be assured that the letter was received and is acknowledged by the certificate holder.	Soil Association Woodmark Meriel Robson
Página 16	T	Información sobre la fuente de las cláusulas de notificación De acuerdo Moving clauses on notification Ok		Ok	CMPC Augusto Robert
1.3.9.f	G	RA agrees with limiting the duration considering we have this in place already. However, it is important to not penalize clients that are actively in the process of closing nonconformities upon that 12 month date. The limit should be applied in cases where a certificate is essentially languishing vs. cases where the client is committed to FSC certification. Note also that item f is new in the FSC system and should have been highlighted for consultation.	Allow discretion of the CB to maintain the suspension status if the client is actively in the process of addressing nonconformities.	The Clause is part of the approved FSC-STD-20-011 V2-0, but new to this draft. This will be clarified in the next draft. The maximum duration of suspensions is proposed to be up to 18 months in exceptional cases (see also Clause 4.7.5)	Rainforest Alliance Alison Lesure, Laura Terrall
1.3.10:	G	What happened when the client didn't acknowledge the receipt? So often there is no evidence available.		The CB needs to provide evidence that the mail was delivered.	Tuev Nord Carsten Kahlert/ Martin Barnack
Part 1, clause 1.3.10,	T	CBs should keep the evidences that the notification was sent. Due to some reasons e.g. technical reasons, the client may not answer or the mailing system doesn't provide such answer as notification are mostly sent by email. In many cases the evidence of receiving the notification will not be available to CBs. Moreover, even if the letter is received by client, it doesn't mean	1.3.10 The certification body shall keep the evidence that the letter of notification is sent to the client.	PSU clarified at the last CB meeting that all means are acceptable that would also be accepted in court (rational is not to be stricter than court), depending on the national	NEPCon Tigran Martirosyan

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		that it is written and acknowledged by client. The additional work of collecting the evidences of client reception of letters doesn't give any value		context.	
1.3.10	T	Include e-mail, there are still many places where a regular letter takes months, if ever.	Include e-mails and the use of electronic communication.	See above.	FSC Sweden Lina Bergström/ Eva Mattsson
1.3.11	E	Include a reference to FSC standards.	Include a reference to FSC standards.	The clause has been amended to specify that all major nonconformities must have been closed.	FSC Sweden Lina Bergström/ Eva Mattsson
1.3.11	T	See comments above regarding Clause 1.2.2.2.h		See above	SCS Global Services Vanessa Ellis
Page 17, 1.3.11	E	This implies that if a client has not removed all use of trademarks while suspended then the reinstatement cannot take place. Thus, the client would remove use and then get reinstated, and then re-install the use.	Check if this could cause issues and result in CB request for interpretation, then adjust requirement as necessary.	See above.	Rainforest Alliance Alison Lesure, Laura Terrall
1.3.11	G	There is no mention of how to handle situations where an annual surveillance audit is needed in very close proximity to the reinstatement audit. For example, if the reinstatement audit is taking place after the time when a surveillance should have occurred, should the reinstatement audit include the full scope of a surveillance audit rather than only verification of corrective actions?	Consider a note or clause addressing this situation. Consider requiring the full surveillance to be required within 3 months of reinstatement of the certificate.	A specific requirement is introduced in Clause 4.7.5 for surveillance audits in case of suspensions.	Rainforest Alliance Alison Lesure, Laura Terrall
1.3.11	T	The current clauses do not address how new NCRs are handled as part of the reinstatement process and certification decision. The following proposal was discussed with Achim in December 2014.	Consider adding a clause clarifying that the certificate can be reinstated as long as: - The major nonconformities resulting in certificate suspension are fully closed;	See above	Rainforest Alliance Alison Lesure, Laura Terrall

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
			- There are no more than four new major nonconformities identified as a result of the audit which are unrelated to the same area that resulted in suspension.		
1.3.12	E	There are too many “shall” statements in this clause.	There should be a new clause starting at “If a decision to reduce the scope of certification is made as a condition...”	The clause was shortened.	SCS Global Services Vanessa Ellis
1.3.12	E	Simplify the text.	Simplify the text.	See above.	FSC Sweden Lina Bergström/ Eva Mattsson
1.4.3	E	Can be simplified	All certification body personnel and committees involved in certification activities shall act impartially.	Agreed, but reference to internal and external personnel is kept.	FSC Sweden Lina Bergström/ Eva Mattsson
1.4.4	G	This is a very important change! So it is as strict as the PEFC standard. In the past it was allowed, that one auditor of a CB is doing the consulting and a colleague is doing the audit. So it is very important, that no internal or external auditor of the CB has done the consulting of a client. We support this separation		Ok	Tuev Nord Carsten Kahlert/ Martin Barnack
Page 17	G/E/T	Impartiality There is a lot bu justified concerns about advice and certification and impartially I however so a bigger thread in CB auditing teams or lead auditors that have been implicated or involved in the creation of the so-called interim standards that are used where no national standard developing group is involved. The question or fact is not only about not asses one’s own work, but in creating the measure as well. I think in the chapter about impartiality language should address this.	The certification body shall be responsible that no-person directly or indirectly involved in the creation of the so-called interim standard shal also be involved in the actual certification process.	It is the task of CBs to adapt standards, but this is a higher level adaptation (not creation) process, where the results are approved by the Policy and Standards Committee. Therefore the introduction of a specific safeguard for this particular scenario is not supported.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Page 17	G	Agree that CBs in some circumstances should be able to provide consultancy to clients (eg. SLIMF, MAP). These situations are relatively low risk and would help bring in more FM certified area where it's really needed. Does ISEAL allow this deviation from ISO? Are there any other implications (eg. Certification scheme compatibility with EUTR or national procurement systems?)	Agree with consultancy permitted in certain circumstances as described. Need for investigation as to implications as described left?	It was concluded at the Working Group level, that it will not be possible to develop and test a model that allows consultancy for SLIMFs as part of the revision process of FSC-STD-20-001. It was agreed to raise this issue in the final report that will be presented to the PSC and FSC Board with a request to FSC to prioritize the development and implementation of a strategy for SLIMFs, which includes the development and testing of requirements that allow consultancy for SLIMFs.	Soil Association Woodmark Meriel Robson
Page 17		SLIMF consultancy option Good, handled well it will speed up the development. Smallholder producers in many countries have very few sources of qualified advice and therefore this is a preferred step. All consultation to be documented.		See above	FSC Sweden Lina Bergström/ Eva Mattsson
Page 17	G	Agreed if there is a strict and global applicable mandatory definition of SLIMF, there are now Nat standards that exceed especially in social dimensions the acceptable limits.		See above	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 17, 1.4.4	G	It has been apparent for many years that the barriers for communities, smallholders and small- and medium-sized enterprises in achieving and maintaining FSC certification, and in realizing the benefits of certification, have been a challenge. FSC has responded	Revise clause 1.4.4 to allow CBs to apply for an exception for certification service delivery and technical assistance for SLIMF and community forest operations provided that the	See above	Rainforest Alliance Alison Lesure,

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		proactively in multiple ways, but there is widespread agreement that the challenges have yet to be sufficiently overcome. Given the mission of FSC, failure to grow among such operations – which often manage areas under heavy threat of deforestation, safeguard globally important biodiversity, and provide income for some of the world's most marginalized groups – constitutes a key challenge and underscores the need for innovation. RA is in favour of allowing technical assistance (TA) to be provided to SLIMF and community operations by personnel under a single legal entity provided that certification services and TA services are provided by personnel managed under separate units within the legal entity (i.e., staffing positions do not overlap and have separate lines of reporting); and provided that functional firewalls are established and monitored to prevent and/or control potential conflicts of interest. Many SMEs and community operations, particularly in the economic south, lack the technical and financial resources to develop and implement conforming FSC management systems. This has a direct adverse impact on the accessibility to FSC for these operations. Until changes are made to the current FSC model, FSC will continue struggling to make meaningful impacts for mission critical SME and community operations in the south. Under the current FSC system where strict conformance with ISO has been a requirement for accreditation, CBs are limited in terms of assistance and technical information they can provide to operations they are engaged with for certification services. In a number of geographic regions, cost-effective options for TA available to these types of forestry operations are either very limited or completely	following conditions are met. 1. Separate staffing units within the organization provide the services. 2. There is no staffing overlap such that individuals providing TA cannot be the same individuals conducting audits of the corresponding client. 3. The organization has created robust firewalls to prevent and/or control conflicts of interest. 4. ASI monitors the implementation of above requirements during normal accreditation audits.		Laura Terrall

Referenc e	Type of comment	Comment	Proposed change	PSU observation	Contributor
		absent.			
Page 17		Option CB consultancy for SLIMFs/ MAP	O.k. if no other option exists.	It was concluded at the Working Group level, that it will not be possible to develop and test a model that allows consultancy for SLIMFs as part of the revision process of FSC-STD-20-001. It was agreed to raise this issue in the final report that will be presented to the PSC and FSC Board with a request to FSC to prioritize the development and implementation of a strategy for SLIMFs, which includes the development and testing of requirements that allow consultancy for SLIMFs.	M-env Greenpeace Judy Rodrigues/ Catherine Grant
Página 17		No estoy de acuerdo que las EC puedan dar servicios de consultoría. Justificaciones: • Si el sistema normativo se quiere adaptar a las ISO, lo hace en un 100% o no lo hace. Cualquier cosa intermedia será un precedente para que se vayan haciendo otras excepciones y finalmente se tendrá un sistema turbio y no consistente. El sistema va a perder credibilidad. • EC que ofrecen asesoría y certificación, pueden cotizar un precio muy distinto respecto de otra EC que solamente haga la parte de certificación. Luego, se genera una competencia desigual entre distintas ECs • Al permitir el asesoramiento, se pierde la imparcialidad al momento de evaluar para certificar, ya que en gran medida se estaría evaluando lo que la misma EC asesoró. Por lo tanto, la EC va a evaluar esos aspectos como conformes y se pierde objetividad en el proceso de certificación. Esto irá en desmedro de la credibilidad del proceso y del sello FSC.	La EC no debe prestar servicios de consultoría a clientes que luego va a evaluar para certificación. Esto también debe aplicar a empresas o entidades relacionadas con la EC. Por ejemplo, Rainforest Alliance y el programa Smartwood. En este sentido debería aplicar el mismo concepto o criterio de la Política de Asociación del FSC para las organizaciones certificadas.	See above	Germán Schaub

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		I do not agree that the CB can provide consulting services. Justifications: • If the normative system must be adapted to the ISO, it does 100% or not. Anything in between will be a precedent to go by other exceptions and finally a murky and inconsistent system will be created. The system will lose credibility. • CB offering advice and certification, may be quoted a different price compared to other CB that only do part of certification. Then unfair competition will be created between different CBs • Allowing CBs to give advice, impartiality when evaluating for certification will be lost since largely it will be evaluated what the same CB advised. Therefore, the CB will evaluate these aspects as fulfilling and objectivity is lost in the certification process. This will be detrimental to the credibility of the process and the FSC label.	The CB should not provide consulting services to clients which will then be evaluated for certification. This should also apply to companies or entities related to the CB. For example, Rainforest Alliance and SmartWood program. In this sense should apply the same concept or criterion of the Policy of Association for FSC certified organizations.		
Option CB consultancy for SLIMFs/ MAP	G	Once the line between CB and consultant is moved, it may jeopardize the integrity of the FSC system. This is a slippery slope – once you allow one type of CH to benefit from consulting, then this can be extended to include others. For example, there are many small COC operations, of less than 5 personnel, which really need help conforming to the standards, so if the option for CBs to consult SLIMFs is opened up, it should be extended to small COC companies as well. As another example, why not allow COC companies who have business with SLIMFs in their CW verification program to benefit from consulting? One discernible benefit we see is that this would allow CBs to better compete with group managers, which would mean more single certificates. This allows better oversight by CBs instead of just a group manager, and it would bring in more AAF for FSC (if consultancy were extended to COC).		See above	SCS Global Services Vanessa Ellis

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Page 17	G	Option CB consultancy for SLIMFs/ MAP I strongly disagree, for I feel this is a critical audit principle (see 19011 for a justification). Even when well intentioned, advice can be wrong, unnecessary or inadequate, introducing “noise” in a relationship that should be as impartial as possible. As a FSC auditor, I have witnessed client frustration as they implement advice given by auditors in “participatory audits”, to then see their efforts criticized by the same auditor or by another in subsequent audits, and their fear of speaking out and “displeasing” their auditors, and thus endangering their certificate. Small organisations, often with lower qualifications, are especially vulnerable to these situations, for they are often not used to openly contradicting their evaluators. Also, if you allow this, it will be so easy to say that audits are just an excuse to find consultancy clients for a CB... Independence and impartiality are the pillars on which audits are based - if you compromise them you compromise the confidence that certification aims to bring.	Forbid provision of consultancy by CBs.	It was concluded at the Working Group level, that it will not be possible to develop and test a model that allows consultancy for SLIMFs as part of the revision process of FSC-STD-20-001. It was agreed to raise this issue in the final report that will be presented to the PSC and FSC Board with a request to FSC to prioritize the development and implementation of a strategy for SLIMFs, which includes the development and testing of requirements that allow consultancy for SLIMFs.	Capital Natural Ana Dahlin
Page 17		Disagree with the position as it has the potential to create conflicts of interest. Regarding SLIMFs recognizing the limited risk associated with this category of CH, it might seem harmless, but this type of practice undermines the fundamental principles of independent verification. Regarding MAP, One can see even further entanglement of interests as given the long standing relationship a CB will have prior to actual full FM/COC certification. There is risk for conflict of interest, incl. the reputational risk due to breaching ISO well established standards.	Do not allow consultancy from CBs to any of their clients.	See above	WWF International
Page 17		For small and medium enterprises, there are sufficient consulting services offered in the market. For SLIMF, sufficient consulting services should be offered through FSC network partner (NI).		See above	Tuev Nord Carsten Kahlert/ Martin Barnack

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		Negative impact through media coverage (and from PEFC) is likely to occur if consulting and training are not clearly separated for CBs.			
Page 17	G	Allow that CBs offer consulting services is not a way to enlarge the certification of small operations. Organizations that intend to certify receive all the information needed from CBs, FSC, experts and even from other organizations to better know the process. Besides that, having this type of consultancy the transparency and credibility of the system would be at stake.		See above	IPEF / CMPC / Lwarcel Celulose Ltda/ Arauco Florestal Arapoti / TTG Brasil Investimentos Florestais Ltda
Page 17 Impartiality Clause 1.4.4	T	No, we do not agree with the proposal – To allow consultancy for a SLIMF or anyone would create a two tier certification scheme and will be perceived to be watering down FSC requirements. Highly damaging for the integrity of the Certification Bodies and highly damaging for FSC itself. Any help to SLIMFs should come from the side of FSC or independent consultants.	Please remove this consultancy note and do not incorporate this rule.	See above	BM Trada John Lovelock
Page 17	G	CB Consultancy means lack of transparency and could be a bias origin.		See above	Klabin SA Ivone Satsuki Namikawa
Page 17		No – CBs should not be allowed to provide consultancy services to small companies such as SLIMFs if this is not in compliance with ISO 17065 and ISO 17021	No – CBs should not be allowed to provide consultancy services to small companies such as SLIMFs if this is not in compliance with ISO 17065 and ISO 17021	See above	FSC UK Rosie Teasdale
Página 19	T	Opción de asesoría de EC para SLIMF/ MAP Si estamos de acuerdo, apoya El Plan estratégico 2015-2020 FSC		See above	CMPC Augusto Robert

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		CB consultancy for SLIMFs We agree, it supports the FSC Strategic Plan 2015-2020			
Page 18		Support the EUTR case-specific standard interpretation	Support the EUTR case-specific standard interpretation	Annex 1 was developed to give guidance on avoidance of conflict of interest. Only generic interpretations will be included in FSC-STD-20-001; the EUTR specific interpretation will therefore be kept separately.	FSC UK Rosie Teasdale
Page 18		We think it is good if a CB can evaluate both the EUTR and FSC for the same client. This strengthens the FSC system and the value for clients.		See above	FSC Sweden Lina Bergström/ Eva Mattsson
1.4.6 (comment)	T	We support to keep the PSU interpretation relating EUTR		See above	SGS Christian Kobel
Page 18	T	Proposal on standard interpretation on Monitoring Organizations (EUTR) I think advice note should stand ie. not deemed a conflict of interest to be a MO	See left	See above	Soil Association Woodmark Meriel Robson
Page 18	T	This stakeholder consultation/standard interpretation should include more than just Monitoring Organizations. There has been an increase of large brand retailers in and outside of the EU engaging NGOs and other consultancy firms to develop Responsible Sourcing Policies. By doing this, these companies are mapping and evaluating all supply chains providing timber or wood fibre products to their stores (sometimes only for specific products) and collecting information on the origin and risk of the information. The overall commitment is to increase certified products within their business models, and to minimize risk for unwanted or illegal materials. This has a profound effect on the supply chain, creating	Expand the FSC Interpretation to include more than just European Monitoring Organizations, and to include organizations that provide Due Diligence System and Responsible Sourcing Program assistance. Suggested interpretation revision: No, FSC does not consider it a conflict of interest, if an FSC accredited certification body is also servicing their FSC certified clients with development and verification of Due Diligence Systems, as this service	See above	Rainforest Alliance Alison Lesure, Laura Terrall

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		demand for certified products, and at times, a financial incentive from the retailer to the supply chain for certification fees. RA is in favour of allowing technical assistance (TA) to be provided to companies needing Due Diligence System assistance and development/verification of a Responsible Sourcing Policy; Because the assistance is on overall sourcing and sustainability, and not assistance to meet a certification standard or requirement, it has no connotations of impartiality. The certification services and TA services are provided by separate divisions (no staff overlap) of the legal entity; and provided that functional fire walls are established and monitored to prevent and/or control potential conflicts of interest.	does not cover compliance elements of the FSC standards.		
1.4.6	T	Stakeholder consultation note (proposal): Based on the above requirement the certification body would need to determine whether a conflict of interest potentially exists and how it is addressed. FSC has published a standard interpretation which specifies that “FSC does not consider it a conflict of interest, if an FSC accredited certification body is also servicing their FSC-certified clients as Monitoring Organization (MO) in the context of the European Timber Regulation (EUTR), as this service does not cover compliance elements of the FSC standards”. Specifically, the certification body may develop a Due Diligence System (DDS), but FSC does not require the certification body to evaluate the DDS. This issue has been controversially discussed at the Working Group level, as it is argued that the concept of a MO potentially creates conflicts of interest, but also that it may be in the interest of FSC to allow MOs. PSU suggests keeping the EUTR case-specific standard interpretation.	GFA support the opinion of PSU and suggest to adapt this interpretation as follows: “FSC does not consider it a conflict of interest, if an FSC accredited certification body is also servicing their FSC-certified clients as Monitoring Organization (MO) in the context of the European Timber Regulation (EUTR), or offering such services without being an accredited MO, as this service does not cover compliance elements of the FSC standards”. Specifically, the certification body may develop a Due Diligence System (DDS), but FSC does not require the certification body to evaluate the DDS.	See above	GFA Matthias Rau
Page 18		Good		See above	FSC Germany

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					Elmar Seizinger
Page 18		Agreed there is no conflict of interest		See above	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 18 1.4 Impartiality Clause 1.4.6	T	It is theoretically fine, but the practice shows that some CBs abused this rule and offer also FSC consultancy in the package – see evidence (FSC Manual): http://www.nepcon.net/FSC-coc-guides-tools This issue has been reported to ASI in April 2014 and since then nothing changed and NEPCon continues to compromise the integrity of FSC system. They have been even awarded a separate accreditation for that!	Please understand that EUTR DDS service is a combination of consultancy + verification. Consultancy is not allowed for Certification Bodies unless they establish a separate business, full stop.	See above	BM Trada John Lovelock
Page 18		In our opinion a MO is not able to perform a non influenced audit, because the CB has a conflict of interest.		See above	Tuev Nord Carsten Kahlert/ Martin Barnack
Page 18	G	Proposal on standard interpretation on Monitoring Organisations (EUTR) I consider it a conflict of interest “if an FSC accredited certification body is also servicing their FSC-certified clients as MO”	Forbid provision of MO services by CBs.	See above	Capital Natural Ana Dahlin
Page 18		Like the above we strongly suggest FSC to safeguards impartialness to the fullest extent possible. Exceptions for SLIMF, MAP and EU-TR will lead to conflicts of interest. A CB should choose what kind of service they wish to provide to any of their customers, Auditor, MO or otherwise.		See above	WWF International

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Página 20	T	Propuesta sobre la interpretación del estándar sobre Organizaciones de Monitoreo (EUTR) No estamos de acuerdo, debe mantenerse por separado. We do not agree, it should be kept separated.	La entidad de certificación NO podría desarrollar un Sistema de Diligencia Debida (SDD). The certification body may NOT develop a Due Diligence System (DDS).	See above	CMPC Augusto Robert
1.4.5	T	Include committees here as well	Include committees here as well	For the certification decision making entity this is addressed in Clause 4.5.3. The impartiality committee is set up to avoid conflicts of interest, see Clause 1.5.14.	FSC Sweden Lina Bergström/ Eva Mattsson
1.4.6	T	Include friendship, relations, kinship, while difficult to handle they are still important. That doesn't mean that such persons to be excluded, more that the risk of such relations to be taken into consideration.	Expand the definitions to friendship, relations and kinship.	The Clause is written at the level of the CB, friendship, kinship etc would be covered under "personnel".	FSC Sweden Lina Bergström/ Eva Mattsson
1.4.7	E	The NOTE is not clear. The "actions" should be described more precisely		The note is deleted as it did not add much value.	Tuev Nord Carsten Kahlert/ Martin Barnack
1.4.8	E	the term "relationships" should be defined more precisely.		The types of relationships that could pose risks to impartiality are clarified in the note to 1.5.6	Tuev Nord Carsten Kahlert/ Martin Barnack
Requirement 1.4.8	T	I don't understand what is meant by the expression "has relationships".	Clarify.	Same as above	Capital Natural Ana Dahlin
1.4.9	G	This is very important to ensure impartiality		Ok	Tuev Nord

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					Carsten Kahlert/ Martin Barnack
1.4.9	T	Please add a Note to 1.4.9 that it is in line with FSC requirements that clarifies the second sentence of 1.4.9. Our general understanding is that it would be ok if personal of the separate legal entity that does consultancy on occasional basis is involved in certification decision, as long as the personal was not involved in the consultancy of that specific certification process.		According to our understanding of this ISO norm the intent is that there is a strict separation between the legal entity (including its personnel) providing consultancy and the CB. The Clause was clarified accordingly.	GFA Matthias Rau
1.4.9	E	It would be easier to read if the topic /content of the reference was written here instead of just a reference.	Please describe in the clause what is meant with the reference.	Reference is deleted as it is not needed.	FSC Sweden Lina Bergström/ Eva Mattsson
1.4.10	T	This is a very detailed clause.	Simplify and streamline	The two shall sentences were merged.	FSC Sweden Lina Bergström/ Eva Mattsson
1.4.11 Note 2	T	Period of 5 years is not a realistic approach and shall be deleted. The current regulation (note 1) is sufficient and shall be maintained.	Delete Note 2	Considering stakeholder feedback it was agreed to introduce a 3 year timeline for lead auditors, certification decision makers and personnel investigating/ approving complaints and appeals.	GFA Matthias Rau
1.4.11	T	To set a five year time period is too long but can also be too short. It is better to keep 2 years for all employees and committee members and then strengthen the conflict of interest policy. It is good to have knowledgeable people and shifting positions. It is already today difficult to find good personnel as auditors.	Keep two years of all.	See above.	FSC Sweden Lina Bergström/ Eva Mattsson

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
1.4.11 NOTE 2	G	The minimum period before COI is lapsed has changed from 2 to 5 years. This is a big difference and SCS does not support this change.		See above	SCS Global Services Vanessa Ellis
Page 19, 1.4.11 note II	G	5 years can be an excessive length of time in many cases.	2 years should be required, and then CB discretion allowed for any other time lapses. Clear justification for decisions to proceed shall be documented.	See above	Rainforest Alliance Alison Lesure, Laura Terrall
1.4.13	T	The note doesn't bring any more content	Take it away.	Yes, removed.	FSC Sweden Lina Bergström/ Eva Mattsson
1.4.13:	G	Good Idea, such a committee is a real improvement as it ensures an additional degree of transparency.		Ok	Tuev Nord Carsten Kahlert/ Martin Barnack
1.4.14	T	Delete Second sentence of Note : NOTE: FSC membership or FSC chamber-balanced representation is not a precondition for the committee. Balanced representation may be achieved by participation of parties with a variety of expertise, providing economic, social and environmental perspectives. Adopt or integrate wording of 17065, 5.2.4	Delete Second sentence of Note : NOTE: FSC membership or FSC chamber-balanced representation is not a precondition for the committee. Balanced representation may be achieved by participation of parties with a variety of expertise, providing economic, social and environmental perspectives. Add the whole sentence and Note. 5.2.4 Although every interest cannot be represented in the mechanism, a certification body shall identify and invite significantly interested parties.	The proposal was discussed, but it was agreed to keep the wording as it was proposed, which should provide enough guidance for the selection of committee members.	GFA Matthias Rau

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
			NOTE 1 Such interested parties can include clients of the certification body, customers of clients, manufacturers, suppliers, users, conformity assessment experts, representatives of industry trade associations, representatives of governmental regulatory bodies or other governmental services, and representatives of non-governmental organizations, including consumer organizations. It can be sufficient to have one representative of each interested party in the mechanism. NOTE 2 These interests can be limited, depending on the nature of the certification scheme.		
1.4.14	T	What is “formally documented”? What is “significantly interested”? 1.4.14 a states that personnel are a single interest. If it is a large CB there might be personnel from other parts of the company which can function as being independent.	Take away “formally” Take away “significantly” Consider rewriting 1.4.14.	Ok, amended.	FSC Sweden Lina Bergström/ Eva Mattsson
1.4.14 (comment)	T	SGS has a committees covering multiple standards and would prefer assess its own cases for assuring company specific judgement and assuring continual improvement.		Considering the stakeholder feedback FSC is not pursuing the idea to create a centralized impartiality committee.	SGS Christian Kobel
Page 20		Proposal for centralized Impartiality Committee	Section 1.4.14 impartiality committee - yes, good idea to set up one centralized committee that is chamber balanced to address ongoing issues and to allow for consistency. If each CB sets up its own, nothing will change.	See above	M-env Greenpeace Judy Rodrigues/ Catherine Grant
Page 20	G	Only on voluntary bases and then it has to be sub-chamber balanced.		See above	FNV Bouw

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 20		Yes, we support the idea for a central impartiality committee.		See above	WWF International
Page 20	G	Leave the operation of this committee in charge of ASI is even more rational, since this is an organization whose responsibilities include ensuring the impartiality of CBs. It does not seem logical a committee belonging to the CB assess its impartiality, it is configured as conflict of interest. In addition, this committee should be composed of expert that know the processes and is chamber balanced.		See above	IPEF / CMPC / Lwarcel Celulose Ltda/ Arauco Florestal Arapoti / TTG Brasil Investimentos Florestais Ltda
1.4.14 Stakeholder Note	G	Committee for safeguarding impartiality Stakeholder consultation note (proposal): This proposal shall not be further developed. - We are in doubt that this is a cost effective approach (GFA committee is staffed with highly -ranking representatives from industry, government, academia and industry associations and is working as volunteers. We doubt that ASI will offer its service for free) - Chamber balanced is not required for operating a committee for safeguarding impartiality. - ASI cannot be regarded as an independent body in this context.		See above	GFA Matthias Rau

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Page 20	T	It is probably better to have national or CB committees to have better understanding of local conditions which will differ widely around world and in different countries.		Considering the stakeholder feedback FSC is not pursuing the idea to create a centralized impartiality committee.	FSC Sweden Lina Bergström/ Eva Mattsson
1.4.15 impartiality cte	T	This effectively means that the ASI “independent” committee is not independent at all since it would be reporting non-compliances directly to ASI who would then take action – so effectively this is another audit mechanism for ASI which is being introduced. Not sure how the confidentiality last sentence would work here anyway as the committee effectively couldn’t tell ASI anything anyway according to this clause??	Disagree with proposal for ASI “independent” impartiality committee	See above	Soil Association Woodmark Meriel Robson
Page 20	T	Centralized Impartiality Committee Disagree with this proposal. It is much better for the system if impartiality systems/committees are embedded into CBs own systems. This would be ASI taking on the role of the CB. Better for there to be clear requirements for these impartiality committees which ASI can assess. Understand that ASI may have some concerns about CB impartiality committees just now and that this is the reason for this suggestions, but clear requirements could address these concerns?	Could ASI confirm what these concerns are and whether they can be addressed through requirements for CB impartiality committees?	See above The idea as presented at the Working Group level was to offer this is an additional service to CBs.	Soil Association Woodmark Meriel Robson
Page 20	G	SCS is not in favor of a centralized Impartiality Committee run by ASI. CBs should be able to set up a committee that works for their needs, and having a centralized committee will increase our ASI annual costs. Additionally, we know from experience that timely responses are not common from a centralized system due to bottlenecks. Furthermore, this could mean that CBs have a much higher bar for raising issues to the committee, if the timeframe for response is unknown and there’s a financial outlay each time a request is posed.		See above	SCS Global Services Vanessa Ellis
Page 20		Proposal for centralized Impartiality Committee	The committee employed by SGS provides far more than what is considered in this standard and SGS	See above	SGS South Africa

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
			would not support a centralised committee. Also, deliberations of such a committee would have to be attended by CBs and this may compromise business confidentiality.		Gerrit Marais
Page 20		A centralized committee is not expedient, because all FSC CB are worldwide located. We are not supporting it, because in some CBs a committee is already in place. It could also make problems with the antitrust law. A multitude of committees (individual committees for each CB) would obviously increase the transparency as there are many more independent stakeholders involved. A single committee would be more difficult to handle (technically, as meetings and reviews of CBs would require much more travelling logistics) and might be regarded as being narrow-minded; for most CBs which already have a committee in place, the committee reviews the entire CB and all certification processes, not only FSC, so there is a broader picture.		Considering the stakeholder feedback FSC is not pursuing the idea to create a centralized impartiality committee.	Tuev Nord Carsten Kahlert/ Martin Barnack
Page 20	G	Impartiality of CBs is ASI responsibility. ASI could be helped by a chamber balanced committee, independent of CBs.		See above	Klabin SA Ivone Satsuki Namikawa
Page 20	G	Proposal for centralized Impartiality Committee I am very uncomfortable with "centralizing functions" in general, without a clear gain. Especially centralizing it in ASI, a organization that operates a monopolized accreditation service. Furthermore, why burden ASI with something that is outside its main aim (to provide accreditation services)? Why should ASI set this up anyway? It already	Drop the idea	See above	Capital Natural Ana Dahlin

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		monitors impartiality as part of its accreditation activity. And most CBs who offer ISO certification already have such a committee, which functions well at a perfectly reasonable cost.			
Page 20		If ASI is acting as central committee for all CB's we do see a conflict of interest. NO's could play a role here as they do have the technical knowledge, interest of high quality certification but are independent from CB's accreditation.		See above	FSC Germany Elmar Seizinger
Page 20		Initially we are in agreement with hearing a proposal, but it is difficult to fully comment without knowing the parameters of the ASI committee. One concern is how ASI could effectively handle this role for such a large number of CBs. Note that RA has a committee regardless and it is expected many CBs will still have to maintain an impartiality committee for other areas they are working in.		See above	Rainforest Alliance Alison Lesure, Laura Terrall
Page 20 Clause 1.4.14 Stakeholder Consultation Note	T	No, we do not agree with the proposal – Unwieldy centralisation of control is not beneficial. CBs should remain responsible for their own business. It could be perceived as a conflict of interest if FSC manages CB impartiality especially if it then has to adjudicate in regard to a CBs actions.	Please remove this consultancy note and do not incorporate this rule.	See above	BM Trada John Lovelock
Page 20	G	Many of CBs are operating in different certification schemes where accredited based on ISO standards. The impartiality committee is required, for example, by ISO 17021. If there is the centralized Impartiality Committee for FSC scheme, it shouldn't be costly for CBs because they still need to maintain another impartiality committee for ISO or PEFC accreditation. Ideally, the impartiality committee by ASI should be free of charge for CBs and costs are covered by accreditation fee.		See above	Tigran Martirosyan NEPCon
Página 22	T	Propuesta de un Comité de Imparcialidad centralizado De acuerdo con un comité con balance cameral.		See above	CMPC Augusto Robert

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		Ok with a chamber balanced committee			
1.4.16	T	Why is should used?	Change to shall or take away.	Using “shall” would be too prescriptive, therefore should will be kept. Should is also a normative term, but a CB can meet the requirement in another way if it is demonstrated and justified (meaning that it gives room to follow the input even if it goes against other requirements).	FSC Sweden Lina Bergström/ Eva Mattsson
1.4.16		Not clear “Input” – from the committee? ie CBs could say this that committee conclusions are in contradiction with own procedures and ignore committee’s conclusions? “review by appropriate personnel” – not clear – from CB? ASI ?	delete	See above “appropriate personnel” is replaced by “accreditation body”.	Soil Association Woodmark Meriel Robson
Page 20, 1.4.16	G	It is unclear what is meant by review by “appropriate personnel”.	There should be a decision process that includes responsible managers for cases that the impartiality committee input is not followed. These cases should be reported to ASI at the office audit.	See above	Rainforest Alliance Alison Lesure, Laura Terrall
1.5.2	T	The language in 1.5.2 – according to this standard makes it very difficult to understand what is required.	Clarify or take away.	This addition is suggested to be removed.	FSC Sweden Lina Bergström/ Eva Mattsson
1.6.2	T	How are for-profit entities going to meet this requirement? The last clause could be used to issue non-conformities for simply running a CB.	Remove the last sentence.	This requirement is not new (it was already part of ISO Guide 65). It relates to non-discrimination of applicants and should not pose any problems to for-profit CBs.	SCS Global Services Vanessa Ellis
1.6.3	G	Contract There is now such thing as an accreditation contract with ASI. Please revise the working to the actual contractual		FSC is currently revising the accreditation contract (which will not be a tripartite agreement anymore but an agreement	GFA Matthias Rau

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		relationship that FSC GD, ASI and a CB have. Also consider that the contract with CB might have to be adopted somehow.		between ASI and the CB). Part of the Clause was incorporated in the certification agreement Clause 1.2.3.	
1.6.3	T	To vague, take away. The text in the note can be used and expanded, it is clearer and more straightforward. Take away "similar issues"	Change text to the comment.	The part of the clause relating to the certification agreement between the CB and the client was included in Clause 1.2.3. The note was lifted to a requirement.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 21, 1.6.4	G	It is unclear what is meant by this clause. The language is not clear, and being that it is new, it will be good to have an explanation of the intention.		The clause is not new, it was included in ISO Guide 65, but is not clear. It is proposed to be deleted.	Rainforest Alliance Alison Lesure, Laura Terrall
1.7.1	T	We propose that the NOs should have a role in the complaints handling and therefore it is needed that the NOs need to be included as well.	Mention NOs as well	Such a process would first need to be developed outside of this standard.	FSC Sweden Lina Bergström/ Eva Mattsson
1.7.2 a)	T	It is also important to include Boards and committees.	Include Boards and Committees.	1.7.2a) is a broad requirement, we need to be careful to not become too prescriptive in each detail. Specific requirements for e.g. the certification decision making entity are included in Clause 4.5.3).	FSC Sweden Lina Bergström/ Eva Mattsson
1.7.4	E	A que se refiere con autorizada por disposiciones contractuales, contrato con quién, si tiene uno de confidencialidad con la empresa certificada. NADA debe ser presentado sin la autorización de la empresa certificada. To whom does "authorized by contractual arrangement" refer to, contracts with whom, if you have one for confidentiality with the certified company.		Authorized by contractual arrangement means that the CB may be allowed to publish information (as agreed e.g. in the certification agreement).	CMPC Augusto Robert

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		NOTHING should be presented without the authorization of the certified company.			
1.8.2	G	Language to be used should include all official languages of countries of operation of the CAB. Which does not necessarily include an official FSC language.	Summary information about the procedures for submitting and handling complaints and appeals shall be publicly accessible on the certification body's and subcontractor's website in the official languages of the countries of operation if the CB.	Yes, amended to require local languages rather than posting the summary in an official FSC language.	Tuev Nord Carsten Kahlert/ Martin Barnack
1.8.2	T	This clause requires that subcontractors have publically available information about submitting a complaint on their website. While this is a good idea, the clause also requires the information to be in an official language of FSC – either English or Spanish. How is that helpful? If the idea is to make the procedure for submitting complaints more transparent, then the information should be posted in a local language that people can understand. It would be strange to have a website all in Japanese and then the complaints information in English.	Change “official languages of FSC” to “local language”. Or require both the local and the official language, if English or Spanish is really that important to include.	See above.	SCS Global Services Vanessa Ellis
1.8.4	E	The clause is not written as a “shall” statement	Rephrase	Amended	SCS Global Services Vanessa Ellis
1.8.4	G	it is not feasible to handle complaints in any language in which the complaint has been written. It would be easy to obstruct CABs activities by writing complaints in exotic languages not commonly used in the country where the CAB operates or where the reason for complaining originates.	The certification body is required to handle complaints and appeals lodged in the same language as the public summary report.	Yes, this is ok for FM complaints, however for other complaints a specific requirement is needed. Clause was amended to clarify that the CB needs to agree with complainant on the language used (which needs to be accepted and understood by complainant).	Tuev Nord Carsten Kahlert/ Martin Barnack
1.8.4		Adopt this clause. It is not reasonable to predefine the language. ASI defines English as the language for Complaints,	1.8.4 The certification body can handle complaints and appeals lodged in the language defined in its own procedures.	This was not considered sufficient. See above.	GFA Matthias Rau

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		and FSC itself defines Spanish/English as the languages.			
1.8.4	T	It is good to include this clause! It is also important that the CB personnel handling a complaint have the knowledge about local conditions in the country of the complaint, and the whole complaint is handled in a culturally appropriate way. We have experienced a case in Sweden where a CB with their HO in another country had very little knowledge and acted in a way which did not respect our indigenous people.	Add that the CB personnel handling complaints need to have knowledge about local conditions and act in a culturally appropriate way.	In section 3.1 only a general statement is made that CB personnel shall be competent for the functions they perform. For some key types of personnel additional requirements are included. We are already adding many specifications to the standard, and have to be careful not to add too many.	FSC Sweden Lina Bergström/ Eva Mattsson
1.8.5	E	Directly addressed, what does that mean. We as a NO gets some of the complaints sent to us and we send them on to the CH or the CB depending on how it is addressed. Then the complaint might not be directly addressed. To us it is more important to that all complaint get handled than that there are very strict lines on who is sending what to whom.	Take away "directly".	The Clause was reworded.	FSC Sweden Lina Bergström/ Eva Mattsson
1.8.5	T	Es amplio, no tiene por qué ser anónimo, atenta contra; Definición de queja. It is broad, there is no need to be anonymous, threatens; Definition of complaint.		Ok	CMPC Augusto Robert
Pages 22-23, 1.8.6	E	The clause states that anonymous complaints or expressions of concern related to certificate holder shall be treated as stakeholder comments. For clarity it would be useful to include a note regarding the CB's obligations in following up on stakeholder comments. Is the expectation that the comment is followed up on during the next regular audit? There is significant time the CB needs to implement for complaints and appeals procedures to follow up on all anonymous complaints outside of normal audit processes. A concern is the potential for unfounded complaints submitted to harass a certificate holder and impose undue cost and effort in responding to non-		Yes, stakeholder comments shall be followed up during the next regular audit.	Rainforest Alliance Alison Lesure, Laura Terrall

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		serious complaints.			
Part 1. Clause 1.8.6., page 22, last line	E	The wording "...anonymous complaints and expressions of dissatisfaction that are not substantiated as complaints as stakeholder comments". Is not clear. Are they complaints or not and should be processed according to complaint resolution procedures? Moreover, if the complaint is anonymous, how to implement 1.8.1 b) and 1.8.9, where complainant are requested to indicate the name and where CB shall communicate the complainant.		Clause 1.9.1b) defines what constitutes a complaint. Anonymous complaints are therefore not rated as complaints, but only as stakeholder comments.	NEPCon Tigran Martirosyan
1.8.6		If a complaint is anonymous it cannot be accepted. ASI-PRO-20-104, Complaints V4, 5.2: Complaints based upon hearsay or anonymous submissions shall not be accepted.	Complaints based upon hearsay or anonymous submissions shall not be accepted.	Same as above	GFA Matthias Rau
Page 23	T	Information on FSC Database of complaints Disagree with proposal. Again this is ASI taking on part of role of CB and it is better for system if CBs have own complaints registers etc. ASI regularly audit these currently. Where is the mandate for this proposal? Don't recall seeing it in a Motion	ASI could report general trends in complaints to FSC?	This information is not meant for ASI but for FSC, Quality and Assurance Unit. It is not based on a GA Motion but based on an FSC internal need to better understand what kind of complaints are raised. This does not make CB complaint registers redundant. The Database will not be set up before 2016 and the details still need to be worked out.	Soil Association Woodmark Meriel Robson
Page 23	T	This is a good development, we are through the Swedish credibility project contribute to this development. It will be important to specify the use of the database!		See above	FSC Sweden Lina Bergström/ Eva Mattsson
Page 23		Information on FSC database of complaints	1.8.7 The certification body shall register all complaints with FSC. This is a good addition and it would be good if the National network partners also had access to this information. It	See above	M-env Greenpeace Judy Rodrigues/ Catherine

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
			allows for FSC to gain a better understanding of the level and nature of complaints across its system.		Grant
Page 23	G	Information on FSC database of complaints I understand your concern, but am also concerned about the resources need to do this properly, and a) the increase in costs in AAF and b) the message that is passed by these initiatives. There seems to be a trend to centralize in FSC and ASI, functions which should be carried out by CBs - and then properly supervised by ASI. This can distract FSC and ASI from their main tasks: standardization and accreditation, respectively.	Drop the idea	The Database will not be set up before 2016 and the details still need to be worked out, considering feedback provided by stakeholders.	Capital Natural Ana Dahlin
Page 23	G	Does it mean that CBs would have to send information on all complaints received to FSC or is this a database exclusively for complaints received by FSC? If the former is true, at what stage would a complaint have to be submitted to FSC? While it is understandable that FSC wishes to have access to this information and an overview of the system, the complaints logged should not be publically available. Finally, there should be no additional burden to the CBs for getting the complaints into the database. This could be done by FSC based on information CBs submit.		See above	SCS Global Services Vanessa Ellis
Page 23	G	Agreed do it annually		See above	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 23		Great that this will be recorded and stored more centrally enabling stakeholders to actively follow the		See above	WWF

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		process. The frequency depends on the nature and quantity of complaints coming in of course, but updating it once a month seems a good frequency.			International
Page 23		Very good suggestion. What would be also good is a kind of ranking. How many CAR's did a CB received through ASI?		The Database will not be set up before 2016 and the details still need to be worked out, considering feedback provided by stakeholders.	FSC Germany Elmar Seizinger
Page 23		FSC database of complaints For FM this is important, for COC this is not needed. There is also the problem, that a complaint could contain personal and confidential information. So for COC this could be very critical.		See above. It is currently not planned to be only limited to FM.	Tuev Nord Carsten Kahlert/ Martin Barnack
Página 25	T	Información sobre la base de datos FSC de quejas No debe estar abierta a todos, son temas de confidencialidad muchas veces. Si FSC debe tenerlas, analizarlas y mostrar tendencias, eso sirve para enfocar auditorías y acciones de los dueños de certificados, pero no para generar discusión sobre situaciones puntuales. Además estas pueden ser extraídas de los informes de auditorías. Should not be open to all, there are often confidentiality issues. If FSC should have them to analyze them and show trends, that serves to focus audits and actions of the owners of certificates, but not to generate discussion on specific situations. Furthermore, these can be drawn from audit reports.		See above	CMPC Augusto Robert
1.8.7	T	It is not clear, when where and what to register. Please be specific what the elements are a CB shall register. Otherwise please delete this clause.	Delete this clause.	This clause is a placeholder requirement as details still need to be worked out (which will not happen before 2016).	GFA Matthias Rau

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		Managing Complaints is a very sensitive issue and is checked by ASI in every audit. If this is now done by FSC then the audit time during ASI Audits shall be reduced. The stakeholder note is misleading as it could be understood that there is a huge amount of fraud in the system.			
Page 23	G	Develop a database with all the complaints directed and managed in the FSC system is important, as stated in the “notes” of the draft, but it is also important to ensure confidentiality of sensitive information from the parties involved.		The Database will not be set up before 2016 and the details still need to be worked out, considering feedback provided by stakeholders.	IPEF / CMPC / Lwarcel Celulose Ltda/ Arauco Florestal Arapoti / TTG Brasil Investimentos Florestais Ltda
Page 23	G	Complaints database is important, since the confidentiality is guaranteed		See above	Klabin SA Ivone Satsuki Namikawa
Page 23		Fully support clause 1.8.7 and creation of a complaints database	Fully support clause 1.8.7 and creation of a complaints database	See above	FSC UK Rosie Teasdale
Page 23, 1.8.7		It is preferred to maintain the current system of CB maintaining a record of complaints and providing to ASI upon request. At a minimum, any periodic reporting of complaints in a centralized system should be limited to <u>formal</u> complaints and all appeals. CBs regularly receive informal complaints that are resolved through discussion. These should not require formal recording processes.		The scope would only be for “formal” complaints.	Rainforest Alliance Alison Lesure, Laura Terrall

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Page 23 Clause 1.8.7	T	No, we do not agree with the proposal – for three reasons: 1) administrative burden for CBs to keep FSC complaints database up-to-dated, 2) complaints include confidential information that is available to CB and ASI only 3) ASI has signed the confidentiality declaration and actually check if the complaints been addressed properly. The records are available at ASI if FSC wants to access them to have an overview. Do not ask CBs to run a statistical tool for FSC.	Please remove this consultancy note and do not incorporate this rule.	The Database will not be set up before 2016 and the details still need to be worked out, considering feedback provided by stakeholders.	BM Trada John Lovelock
1.8.7	T	Complaints are registered in the SGS own system. We believe that it is not efficient to register all complaints in an additional FSC database. FSC and ASI can have access to the complaints registered by CABs on request. We need no new rule for that. Stakeholders who are obviously are interested in such a database would have to be informed that they have anyway no access due to confidentiality reasons. We see no additional value in such an additional system, just more administrative work and therewith more costs for CABs	Cancel the requirement.	See above	SGS Christian Kobel
1.8.8 & 1.8.9e) NOTE	T	CB shall be responsible for “gathering”? actually Stakeholder who has submitted complaint / appeal is responsible for providing all information as necessary for the CB to evaluate	1.8.8 Suggest amend to: “The CB shall be responsible for verifying all submitted information...” 1.8.9e) NOTE; suggest amend to: “A complaint may be considered closed when the CB has verified all submitted information...”	The intent of this ISO clause is that the CB needs to make sure that all information necessary to address the complaint is collected and verified. It may be sufficient to only use the information provided by the stakeholders, but there may also be cases where the CB needs to gather additional information.	Soil Association Woodmark Meriel Robson
1.8.9	T	3 months may be too restrictive in some cases. For example, some investigations may involve visiting the FMU at a certain time of year.	Add “where possible” to the end of the clause, or lengthen the required timeline.	The 3 months timeline means that conclusions are communicated to the complainant, this does not mean that the entire complaint is closed within this time period.	SCS Global Services Vanessa Ellis
1.8.9	T	d) As we understand in 20-006, 7.3 it is specified that if the complaint seems to be maximum a minor NC the	d) It has to be described when a complaint can be investigated at	Timelines for investigation of complaints are scope specific	FSC Sweden

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		CB do the investigation at the normal audit of the certificate holder. This normally takes longer times than 3 months so the two documents has to state the same or reference each other e) Don't forget the appeal What about information to the certificate holder if someone else makes a complaint to the CB about the certificate holder, when are they informed about the decision?	normal audit and not. Include the appeal in e) When and how is a certificate holder involved in a complaint informed about the complaint and the outcome?	(as specified in FSC-STD-20-006), not generic. The specific addition in e) is only meant for complaints, d) applies to both complaints and appeals. The standard should not become too prescriptive in regulating too many details.	Lina Bergström/ Eva Mattsson
1.8.10	T	Referring to "certification activities" means just about everyone. There is no reason why the accreditation manager who may also take certification decisions, may not be involved in considering a complaint. If the CB is to adhere to this rule, they will always have to go to an outside entity to deal with complaints and this will be costly, take time and serve no real purpose.		Certification activities was replaced by "evaluation", to be more specific.	SGS South Africa Gerrit Marais
1.8.11	T	1.8.11 is very confusingly worded and could imply that a different auditor evaluate complaints about the same organization for each incident, thus disqualifying a large number of auditors from investigating complaints within a short timeframe.		It is not clear what is confusing about the wording. The requirement introduces a timeline for conflict of interests to lapse for personnel that review or approve a complaint and appeal for three previous activities: previous audit of a client, employment or consultancy.	SCS Global Services Vanessa Ellis
Page 23/24	G	Proposal for Conflict of interest timeline Agree with five years in relation to 1.8.11 formal investigation and/or decisions on complaints and appeals, but not 1.4.11 as already stated above. Note that value may be added when past auditors are consulted as part of the complaints investigation, so they should not be restricted from being part of the process. These individuals should not form part of the formal investigation team.	The personnel responsible for formally investigating and/or approving the resolution of a complaint or appeal shall be impartial and independent of the certification and audit relevant to the dispute, e.g., individuals shall not have been involved in the audit activities or certification decision process.	This is captured in the revised clause 1.9.10.	Rainforest Alliance Alison Lesure, Laura Terrall
Part 1, clause 1.8.11,	T	Personnel who have audited the client shall not resolve the complaint or appeal within 5 years	Propose to exclude reference to auditor in 1.8.11 and if necessary to add the new clause which is in	Clause 7.13.5 is already included as 1.9.10, however feedback was received that	NEPCon Tigran

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
page 23		The clause mentions auditors who audit the client and then 5 years in the end is about consultancy and employment. Not clear how the requirement in the clause refer to the auditor. ISO 17065 in 7.13.5 means that the auditor shall not be involved in resolution of a dispute related to certification activities conducted by this person. E.g. auditor shall not resolve the complaint against client's performance if this aspect of client's performance was evaluated by the auditor or decision maker shall not be involved in appeal resolution of certificate suspension, if this decision maker made the decision of suspension	compliance with ISO 17065, clause 7.13.5	"certification activities" is too broad, see above.	Martirosyan
1.8.11	T	A potential conflict of interest depends on the specific case and not on time frames. If the complaint is related to the bad behaviour of the auditor a person who made the certification decision is not concerned and can still make a decision about the complaint. Rewording suggested.	"Any person directly or indirectly accused by the complaint shall not approve the resolution of the complaint."	The Clause is meant as a safeguard to avoid conflicts of interest.	SGS Christian Kobel
Page 23/24	T	Proposal for Conflict of interest timeline Agree		Considering stakeholder feedback it was agreed to introduce a consistent timeline of 3 years for lead auditors, certification decision makers and personnel investigating/ approving complaints and appeals.	Soil Association Woodmark Meriel Robson
1.8.11	G	This is important! We support this idea.		See above	Tuev Nord Carsten Kahlert/ Martin Barnack
Page 23/24		Agreed.		See above	Tuev Nord Carsten Kahlert/ Martin Barnack

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Page 23/24		Good		Considering stakeholder feedback it was agreed to introduce a consistent timeline of 3 years for lead auditors, certification decision makers and personnel investigating/ approving complaints and appeals.	FSC Germany Elmar Seizinger
Page 23/24	G	Agreed 5 years is appropriate 2 years to short		See above	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 23/24		The number of years follow the cycle of certificate validity, so yes it makes sense.		See above	WWF International
Page 23/24		As argued before we think it is two or three years is enough if the conflict of interest handling is more explicit and wide in definition and use. As said before a 5 years time limit can still be much to short in some cases, and at the same time much to long in others. 5 years looks good and strong but is hindering development, and the use of experienced people.	Keep it to two years.	See above	FSC Sweden Lina Bergström/ Eva Mattsson
Page 23/24 1.8.11	T	Proposal for Conflict of interest timeline Why 2 years is not sufficient?	Remain current 2 years.	The Clause is meant as a safeguard to avoid conflicts of interest. The current timeline was not considered sufficient. Considering stakeholder feedback it was agreed to introduce a consistent timeline of 3 years for lead auditors, certification decision makers and personnel investigating/	BM Trada John Lovelock

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
				approving complaints and appeals.	
1.8.11	g	5 years is a too long timeframe.			GFA Matthias Rau
Page 23/24	G	This is excessive and is above and beyond the term recommended by other schemes (2 years). For example, it may mean that CBs may be unable to use different auditors to investigate complaints by the same people within a 5-yr. period. Does FSC have evidence that the 2-year period is not sufficient for the majority of instances? A few high-profile conflicts may not be enough to justify making a blanket extension to 5 years.		Considering stakeholder feedback it was agreed to introduce a consistent timeline of 3 years for lead auditors, certification decision makers and personnel investigating/ approving complaints and appeals.	SCS Global Services Vanessa Ellis
Page 23/24	T	Proposal for Conflict of interest timeline Why the difference (5 yrs for lead auditors and decision-makers vs. 2 yrs for other personnel involved in certification)?	The minimum period for conflict of interest to lapse should be 2 years for everyone (except for those involved in complaint resolution, which is a especially sensitive task, and for those it should be 5 years). Also, it should be applied after participation in an audit, and not only before.	See above	Capital Natural Ana Dahlin
Page 23/24	T	Propuesta de tiempos de caducidad de conflictos de interés De acuerdo Ok		Ok	CMPC Augusto Robert
1.8.13	T	What happens to an appeal which the one making the appeal want to take to the international part of FSC?	Include handling of appeals, or appeals transferred to complaints.	If an appeal is transferred to a complaint, then the complaints process is applicable.	FSC Sweden Lina Bergström/ Eva Mattsson
1.8.13	T	It should be made clear that in order for the complainant to refer the complaint to ASI, evidence	I would add the following sentence. I would make it another point so that it's	After discussion with the Working Group it was concluded	FSC GD

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		must be included to justify the escalation of the grievance. In the standard, it's described as an automatic process but it should not be. An escalation is justified only when: - new elements are available that disprove the conclusion reached by the certification body - evidence submitted by the complainant was not taken into account by the CB – the complainant can demonstrate that the CB acted negligently or unprofessionally in the evaluation of the complaint. If we don't make this clear, most complaints will be escalated to ASI. I can foresee that in a significant number of cases, the escalation will not be substantiated. We would be creating unjustified burden for the system.	a strong requirement “To refer a complaint to ASI and ultimately FSC, the complainant shall: - Provide new evidence that disproves the conclusions reached by the certification body And / or - Demonstrate that the evidence submitted with the complaint or in the course of the evaluation was not taken into account by the CB And/or – Demonstrate that the CB acted negligently or unprofessionally in evaluating the complaint.	that no further specification is needed, as ASI in any case would need to investigate the complaint.	Thomas Colonna
Page 24		Publicly available information Agree with establishing a link to FSC normative documents for certification according to the scope of the accreditation of the certification organization.		Ok	WWF International
1.9.1	G	it is sufficient to make these information available on request . FSC should avoid such countless accumulations of documents, it is already perceived as over-bureaucratic by many stakeholders.	“The certification body shall maintain and make available on request, the following:...”	It is planned to keep this Clause as such information is considered important to be available upfront to potential clients/ clients in alignment with the ISO requirements and not only upon request.	Tuev Nord Carsten Kahlert/ Martin Barnack
1.9.1	T	It would be good if the CBs publicly declared which scopes they are accredited for. a) Divide the text into two sentences to make it clearer and easier to understand. b) A general fee schedule would be of interest	CBs to describe the scope they are accredited for. a) Divide the text into two sentences b) Request a fee schedule	Ok, amended to include information about the FSC accreditation scope.	FSC Sweden Lina Bergström/ Eva Mattsson
1.9.1.a	T	This is sufficiently covered by the publicly available FSC certification and accreditations standards.	Cancel this point	Agreed. The Clause has been reworded, see above.	SGS Christian Kobel
1.9.1	T	What is meant by “fees”. We will not declare our fee structure as this is business sensitive information and		This clause is not new. It only	SGS South

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		also, this varies greatly from country to country. At best the CB can be expected to explain what is charged for, but not how much.		requires that general information related to fees are provided. This could include what is charged for, but also a range of fees that can vary depending on the country.	Africa Gerrit Marais
1.9.1 b:	E	what is exactly meant by “general information on the fees charged to clients”? As this is delicate business information, it should be more clearly expressed what kind of information is required to be made public.		See above	Tuev Nord Carsten Kahlert/ Martin Barnack
Requirement 1.9.1 b)	T	Sources of funding What is meant by this?	Clarify	ISO 17065 states “a description of the means by which the certification body obtains financial support”, which we modified to say “sources of funding”. It means how the CB is financed. If the CB works for profit, it is sufficient to indicate that the CB is funded by fees charged to clients.	Capital Natural Ana Dahlin
1.9.1.b	T	We do not see a sufficient public interest which justify the a requirement for publishing fees. It shall remain a economical decision of each CAB. Each applicant can request a proposal. If the CAB is only funded by the fees they charge to certificate holders, there should also be no obligation to communicate this on the website. May be if there other sources.	Cancel this point	See above.	SGS Christian Kobel
1.9.1.b	T	What is “sources of funding” and why should it be publically available?	Remove this part of the clause	See above	SCS Global Services Vanessa Ellis
Page 24	G	Organizational structure It would be useful if this was made available to FSC	It would be useful if this was made available to FSC (and Network Partners) to ensure we raise issues	At least the organizational structure needs to be published on the CB website as specified	FSC UK

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		(and Network Partners) to ensure we raise issues with relevant personnel	with relevant personnel	in Clause 1.9.1c)	Rosie Teasdale
2.1.2	E	The introducing text is not corresponding to all points underneath. Probably this list can be clearer formulated and ordered. i) This sentence is difficult to understand	Go through the text to see if it can be better formulated and better order of points. i) Please rewrite the sentence so it is understandable	Ok, the list has been restructured and shortened.	FSC Sweden Lina Bergström/ Eva Mattsson
2.1.2.m	T	What does it mean to specify the person having responsibility for “personnel competence requirements”? Is this in reference to Annex 1? If so, it should be stated explicitly. Is this in reference to who trains personnel?	Clarify.	It is in reference to whom is responsible for overseeing implementation of the personnel competence requirements. References have been included.	SCS Global Services Vanessa Ellis
Requirement 2.1.2 f)	T	Evaluation According to your own definition, evaluation INCLUDES Audit review and decisions on certification, and so 2.1.2 g) and h) should be eliminated - please use one concept only!	Clarify	Agreed. g) and h) are eliminated and reference to the sections is included under j).	Capital Natural Ana Dahlin
2.2.	T	The whole 2.2 (especially 2.2.1 – 2.2.4) needs to be more FSCified to better fit in the FSC system. It is a quite advanced text which could be more concrete and more in line with wording in other parts of the document. What is the top management, please define or change to only management. The heading doesn't really fit with the content, take away.	Please rewrite the text to be more conform with the rest of the document both in style, content and terminology.	The section was amended. A definition for top management is introduced.	FSC Sweden Lina Bergström/ Eva Mattsson
2.2.1	T	What does “top management” mean? At group corporate level or within the division where the certification services are offered?		See above	SGS South Africa Gerrit Marais
2.2.2.1	G	“...acknowledged and implemented at all levels of the certification body's organization” encompasses potentially too many non-FSC-related staff and departments. Would be sufficient to require acknowledgment and implementation by all FSC relevant staff or positions.	“...acknowledged and implemented at all levels of the certification body's organization relevant to FSC certification”	Yes, amended.	Tuev Nord Carsten Kahlert/ Martin Barnack
2.2.6	T	Include impartiality j) Take away this paragraph or write what is intended, this is not useful	Include impartiality Take away j) or elaborate the content	We do not want to make an exhaustive list, but leave room for other procedures that may	FSC Sweden Lina Bergström/

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
				exist.	Eva Mattsson
2.3.2	E	Concentrate text as is quite open and vague a) Adequacy? Hopefully all documents are approved before use. b) Take away as necessary	Rewrite 2.3.2	The text was streamlined.	FSC Sweden Lina Bergström/ Eva Mattsson
2.3.2	T	It is impossible to “prevent” unintended use of obsolete documents. The CB can at best take measures to minimise the risk, but to absolutely “prevent” is impossible. It will happen.		The Clause requires that control measures are taken with the aim to prevent or avoid it from happening.	SGS South Africa Gerrit Marais
2.4.2	G	who can ensure confidentiality in times of NSA et al.? No electronic filing and messaging system is entirely safe. This requirement cannot be fulfilled by any CB, and not by ASI or FSC as well. A requirement which cannot be fulfilled or verified is useless.		Clause was amended to clarify that measures are taken with the aim to ensure confidentiality.	Tuev Nord Carsten Kahlert/ Martin Barnack
2.4.2	T	Records needs to be defined, either through 2.4.1 or in a proper definition	Define records.	This seems clear to CBs as intended users of the standard.	FSC Sweden Lina Bergström/ Eva Mattsson
2.4.4	G	Why should it be changed into 7 years. We think that 5years are enough.		The current standard already requires a retention time of 7 years and is proposed to be kept unchanged.	Tuev Nord Carsten Kahlert/ Martin Barnack
Requirement 2.5 NOTE	T	Given that ISO 19011 is not a normative standard, please clarify: are the 19011 guidelines mandatory for ASI accredited CBs?	Clarify	Reference in the note of Section 2.5 is informative, not normative. Where ISO 19011 is connected with a requirement (may, can, should, shall) in a standard it is normative.	Capital Natural Ana Dahlin
2.5.3	E	This should be changed. 12 month is not workable. It would be better to change it in “once a year” or every 15 month (similar to the standard COC audit schedule!), but not strictly every 12 month, because		It was agreed to keep the Clause unchanged (not to adapt the timeline).	Tuev Nord Carsten Kahlert/ Martin

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		then it is a NC for the CB when between two internal audits are 12 month and 1 week.			Barnack
2.5.4	T	e) A bit of overkill, take away!	e) Take away	It was agreed to keep the Clause (as this is apparently what CBs do anyway), but it is clarified that “existing” opportunities are identified.	FSC Sweden Lina Bergström/ Eva Mattsson
2.5.5	T	SGSCH has more and more of the relevant information centrally and digitally available. We set up a system with quarterly monitoring of KPIs of local offices and performance review of persons with delegated key activities (e.g. reviewers) finally a sample of local offices is visited physically. It is not understood by ASI auditors that a internal monitoring can be more complex and have different levels. Therefore we propose a new formulation.	Planning and implementation of the internal audit program shall include the offices of all subcontractors and CABs with multiple sites. All relevant activities shall be assessed at least once per year.	The clause was modified in alignment with the revised section 3.2.	SGS Christian Kobel
2.5.5.	T	The second part of this clause is redundant to Clause 2.5.3.	Remove “...which shall be subject to at least one (1) annual audit by the certification body.”	Agreed.	SCS Global Services Vanessa Ellis
Requirement 2.5.6	T	Each subcontractor shall be subject to at least 1 on-site audit every 3 years. Confusing. 2.5.5 seems to require 1 annual audit of all offices of subcontractor - when can these audits be off-site?	Clarify	It means that only one every 3 years an on-site audit is done while in the other two year a desk audit is sufficient.	Capital Natural Ana Dahlin
2.5.6	T	Affiliate The second sentence of the clause could be further specified if possible to situation where the affiliate is just a just a one person office. An on-site audit can be conducted anywhere.		Section 3.2 defines the scope of requirements for bodies providing outsourced services.	GFA Matthias Rau
2.5.7	E	Why is the way of publishing inserted here? There are many references to FSC documents in the text. Take away Continuous conformity would be better with conformity.	Rewrite	Agreed.	FSC Sweden Lina Bergström/ Eva Mattsson
2.6.3	E/T	b) Note – take away d) Preventive actions? Are they mentioned elsewhere,	Rewrite to make more concentrated and more readable	2.6.3 is just a list with all items that need to be considered.	FSC Sweden

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		elaborate or take away. Maybe a reference to 2.8? f) Fulfilment of objectives, elaborate or take away.		Some changes are proposed as suggested.	Lina Bergström/ Eva Mattsson
2.7.4 and 2.8.3	T	Some repetition detected.		Section 2.7 and 2.8 have been merged and shortened, where possible.	SGS Christian Kobel
2.8.2	T	Appropriate, probable and potential in the same sentence makes the clause very vague.	Rewrite or take away.	See above.	FSC Sweden Lina Bergström/ Eva Mattsson
Section 2.8		Preventive actions of the certification body – I don't really understand the purpose of this section. On one hand it is obvious that CB must comply to this standard but this section is highlighting where CBs must anticipate potential non-conformances and manage for them accordingly. I don't think this section is necessary.		See above Self control of the CB is a key aspect of a quality management system, of which this section is a part of. The intent is that these additional safeguards are put in place to ensure that requirements are met.	M-env Greenpeace Judy Rodrigues/ Catherine Grant
Section 3.1	T	Substantial feedback to the auditor qualifications WG was provided and is not being repeated here. Trust these will find their way into this standard?		In the previous draft version it was not yet possible to integrate all demands put forward by M 52. This has been done since and more specifications were added. Close cooperation and feedback by the WG confirmed that this is now ok.	SGS South Africa Gerrit Marais
PG 30 3.1	T	Does this section not include too much specific detail for this standard?		Some substantial changes have been made in the new draft version (in part 3.1 but also with annexes) to be clearer and more systematic about the requirements for qualification and training of auditors.	SGS South Africa Gerrit Marais
Page 30	G	CB personnel	This only addresses competence of auditors. Are there any requirements	Competence of other CB personnel apart from auditors	FSC UK

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		This only addresses competence of auditors. Are there any requirements for other staff, e.g. those approving artwork, etc.	for other staff, e.g. those approving artwork, etc.	was considered for the new draft version: In part 3.1 and in the annex about audit team requirements	Rosie Teasdale
Page 30/31	G	I don't feel strongly one way or another as long as the requirements within are consulted properly and in detail		No final decision yet – will be discussed more	Soil Association Woodmark Meriel Robson
30/31	G	SCS is not in favour of creating a separate standard for personnel and competence		No final decision yet – will be discussed more	SCS Global Services Vanessa Ellis
Page 30/31	T	Yes, please create a separate standard for CB competency requirements.	Yes, please create a separate standard for CB competency requirements.	No final decision yet – will be discussed more	BM Trada John Lovelock
Page 30/31		Not in favour of creating separate standards for CB personnel. It does indeed add to the overload in normative documents and FSC needs to stay as lean as possible.		No final decision yet – will be discussed more	WWF International
Page 30/31	G	Prefer to incorporate into FSC-STD-20-001 in line with FSC's approach to reduce/minimise the number of normative documents	Prefer to incorporate into FSC-STD-20-001 in line with FSC's approach to reduce/minimise the number of normative documents	No final decision yet – will be discussed more	FSC UK Rosie Teasdale
Page 30/31	G	Against. The reasons in creating a new standard that addresses the skills of CB's employees are the same presented in the notes of the draft.		No final decision yet – will be discussed more	IPEF / CMPC / Klabin SA/ Lwarcel Celulose Ltda/ Arauco Florestal Arapoti / TTG Brasil Investimentos

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					Florestais Ltda
Page 30/31	G	No creation of an addition standard for personnel, it needs to be integrated in this standard. Not only the need for simplification and the need to reduce the number of normative documents, But FSC ASI doesn't have a formal relation with auditors, only with CB's. And as additional argument if the personnel doesn't comply with the requirements so won't the CB. It employs people that meet the requirement or it losses it licences to operate	Certification bodies are always ultimately responsible to conform to accreditation requirements. FSC is not proposing to develop a standard for auditors but for personnel of the CB which has to be met by the CB.	No final decision yet – will be discussed more	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 30/31		We prefer no new document for CB personnel and competence. This should be part of the FSC-STD-20-001		No final decision yet – will be discussed more	Tuev Nord Carsten Kahlert/ Martin Barnack
Page 30/31		RA supports maintaining all requirements for CB personnel competence and qualifications within FSC-20-001 in an effort to reduce the number of normative documents within the FSC system.		No final decision yet – will be discussed more	Rainforest Alliance Alison Lesure, Laura Terrall
3.1 (comment)		We support very much to create no additional new standards for Resource Requirements. Additional accreditation standards with different revision cycles create more work for certificate holders and CABs. It reduced the motivation of all involved when the Standard is changing every year.		No final decision yet – will be discussed more	SGS Christian Kobel
Page 30/31	T	Propuesta para crear un estándar separado para el personal de las EC No estamos de acuerdo, ya que afecta el Plan de estrategia global 2015-2020 FSC, reducción de documentos normativos. We do not agree, it is affecting the overall strategy Plan		No final decision yet – will be discussed more	CMPC Augusto Robert

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		2015-2020 FSC, the reduction of normative documents.			
Page 30/31		Personnel contracted or employed by the CB should be proportional to the scale and intensity of the Company to be certified,		Under part 3.1 there are specifications that ask CB's to consider this.	WWF International
Page 31, 3.1.1	T	Specific knowledge about the national standards (FM) is a main competence needed for auditors.		This is now addressed through specifications given in an annex that outlines the content of what auditors need to know and be able to do (-> annex 5)	FSC Germany Elmar Seizinger
PG 31 Stakeholder note below 3.1.4.1	T	For example points: Know the activities of an audit process and be able to, in a systematic and consistent manner: • Review the audit plan to evaluate its conformity with requirements and if it is adequate to the audit objectives and requirements established by the audit program; • Evaluate the content of the audit report: conformity with objectives, audit scope, classification of findings and use of adequate evidence; conformity of the organization's COC or FM system, as applicable.	See my first point. This means that this person (Project manager) must be a LA? The proposals and auditor allocation cannot be done by back office personnel.	This passage has been removed.	SGS South Africa Gerrit Marais
Page 30/31		This area of resources and competence is important to FSC. The expert group and the FSC training manager as a new position is giving power to develop this area. The motion calls for standards, procedures, training and competencies for auditors which are welcome. We would like to see a general requirement not only for auditors but also for personnel as the heading of part 3 describes. We don't want to see a separate standard, the personnel requirements and conditions are core to the FSC system, keep it here.	Please see the comments.	Comment has been considered and resulted in some more specifications for personnel needed for an audit and/or evaluations as it appears reasonable. Part 3.1. has been amended to make it clearer and more consistent – also in relation to other parts of the document.	FSC Sweden Lina Bergström/ Eva Mattsson

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		But our opinion is that these texts on personnel are too elaborate, almost one quarter of the whole document covers of personnel issues. This is unbalance and the text have to be shortened and more concentrated to function as an international standard. It is not either in line with the general FSC coming policy of streamlining and more efficient documents. We would like to see the text being worked through and circulated again.			
Page 31/32 Clause 3.1	T	Proposal for application reviewers Yes, we agree apart from the fact they should not be qualified at the level of an auditor. There is no rationale behind this new proposal.	Please remove: "shall be qualified at the level of an auditor"	Specification of the application reviewer (one or more persons) needing to be an auditor has been removed.	BM Trada John Lovelock
Proposal for application reviewers	G	Application reviewers should NOT have to be qualified auditors. Scoping a project does not require the technical aspect of auditing. This adds unnecessary and prescriptive steps that decrease efficiency and lead to little discernible additional value. While it is reasonable to have competence requirements for application reviewers, it is too restrictive to require that they be qualified as an auditor, as noted above. Nor should they need to have advanced knowledge of the "activities, products and processes of the auditee"; "applicable legal requirements..."; or "customers, suppliers, and other interested parties...". Reviewing the audit plan and report are the role of the report reviewer. Therefore, the only reasonable option presented to stakeholders is to "demonstrate a level of knowledge and experience sufficient to prepare the audit processes and select a lead auditor and an audit team." These competence requirements could also be extended to those who scope annual surveillance and re-evaluation audits.		Specifications have been amended in order to be focused on quality assurance rather than being too prescriptive. Application review can now be done by one person or more than one person.	SCS Global Services Vanessa Ellis
Page 31/32	G	Agree. With the definition of the requirements needed for the reviewers, the process seeks to ensure greater		Specifications/requirements for CB personnel was reviewed as it	IPEF /

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		transparency and training due to their careful and detailed work. However, this may result in an increase of audit costs.		apparently was not clear enough and in parts too restrictive.	CMPC / Klabin SA/ Lwarcel Celulose Ltda/ Arauco Florestal Arapoti / TTG Brasil Investimentos Florestais Ltda
Page 31/32		Fine. All personnel and also committee members has to be qualified to their tasks including application reviewers, the ones screening audit reports and the ones taking a certification decision, not to mention the functions on the audit team.		Specifications/requirements for CB personnel was reviewed as it apparently was not clear enough and in parts too restrictive.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 31/32		Having the competence for application reviewers make sense as these people are responsible for a critical part of the evaluation – they define the level of efforts, from the audit team. In NEPCon system, such people are task managers, who shall have lead auditor qualification and competence in reviewing application, defining level of efforts, preparing the proposal for a client. The task manager is assigned for any audit, including annual surveillance and scope change as these audits also require preparation and lead to certification decision (e.g. extend or suspend the certification and under what conditions)		After consultation it became clear that especially the application review is done in a rather different way across CAB's. Therefore the revised requirements are focused on assurance of quality of the task rather than focusing on the competence of the person.	NEPCon Tigran Martirosyan
Page 31/32	T	Propuesta para revisores de solicitudes Estamos de acuerdo en las competencias, pero tenemos dudas de cómo se hará lo relacionado a determinar el momento de que el aspirante está listo. Se mezcla con las funciones del Líder del equipo, serían dos encargados para iguales funciones, encarece los costos fijos de las auditorías.		Specification of the application reviewer (one or more persons) needing to be an auditor has been removed.	CMPC Augusto Robert

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		We agree with the competence requirements, but we have doubts about how it relates to determining when the applicant is ready. It mixes with the functions of team leader, responsible for the same would be two functions, increases the fixed costs of audits.			
3.1.4.1 (stakeholder consultation)	T	We do not support that the reviewer of the CH application must be an auditor. For this function specific training can be conducted, which is not necessarily overlapping with the qualification required for auditors.		Specification of the application reviewer (one or more persons) needing to be an auditor has been removed.	SGS Christian Kobel
Page 31/32		Proposal for application reviewers. Yes but I miss in the summation customers, suppliers, and other interested parties of the auditee the specific mentioning of unions, a lot of critic from me and my colleagues from the unions come from the fact that the application reviewers don't have active knowledge of the unions that are active in that region.	Add unions as specific interested parties to the auditees.	Wording for application review has been amended in a way that this can be done by one or more persons. Also, the wording is to assure that it can apply across all situation and the way the application review is addressed throughout different CAB's.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 31/32	G	Proposal for application reviewers Don't feel strongly about this clause		Ok	Soil Association Woodmark Meriel Robson
Page 31/32	E	Proposal for application reviewers RA sees this as a role and not a particular person and suggests a slight change to the definition to reflect this.	Suggested definition language: Application Reviewer: the role of the person(s) who check(s) if an applicant for certification is ready and prepared for an audit. This person also selects the auditor and the audit team. Note: it is possible that this person can fulfil multiple roles such as client manager, decision reviewer or trademark approver.	Wording has been amended allow "application review" to be a role and that the application review can be done by one or more persons.	Rainforest Alliance Alison Lesure, Laura Terrall
Page		Yes in favour it will add to the impartiality of the		Specifications/requirements for	WWF

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
31/32		certification process and will also enable the capacity to flag potential issues at an early stage.		application review was amended as it apparently was not clear enough and in parts too restrictive	International
Page 32		Not convinced this is necessary as the assumption would be that lead auditors, one of the prerequisites, should possess these qualities.		Ok	WWF International
Page 32	G	Disagree with: "Review the audit plan...". Practically what Reviewers do is review the Audit report (which contains requirements for information as to what was visited, time spent etc so achieves the same thing only in more detail). Agree with "Evaluate content of audit report..."	Amend "review the audit plan..." to "review the audit report..." or delete altogether as second clause covers it	Specifications/requirements for application review was amended as it apparently was not clear enough and in parts too restrictive	Soil Association Woodmark Meriel Robson
Page 32		Proposal for certification decision makers Agree. Audit plan is integrated into report so anyway reviewed by decision makers.		Ok	Tigran Martirosyan NEPCon
Page 32	G	Proposal for certification decision makers The proposal appears to be defining the rules for the decision making process rather than just qualifications for decision makers. RA is fine with the language as written in 3.1.4 (a) (i) and (ii), but is not in favour of introducing amendments to the qualifications of decision makers as outlined in the stakeholder consultation note.		Wording has been amended for the role of "certification decision making" to focus on quality assurance rather than being too prescriptive about the competence of the person(s).	Rainforest Alliance Alison Lesure, Laura Terrall
Page 32	G	Yes		Ok	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
PG 32 3.1.4.1		b) select and employ the necessary personnel. For the selection of auditors and lead auditors, personal	How will this be recorded?	Probably in the ASI registry for auditors the mean(s) of selection	SGS South Africa

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		attributes shall be taken into consideration. NOTE: Personal attributes are characteristics that affect an individual's ability to perform specific functions. Knowledge about personal attributes of individuals enables a certification body to take advantage of their strengths and to minimize the impact of their weaknesses. Desired personal attributes that are important for personnel involved in certification activities are described in Annex 1.		will be recorded	Gerrit Marais
Page 32 Clause 3.1.4.1	T	"ii. the certification decision maker(s) (Clause 4.5.2) shall be qualified at the level of a lead auditor" – this requirement is too high. There is no rationale behind this new proposal.	Please use the current rule: "The entity, which may be an individual, who makes the certification decision, shall incorporate a level of knowledge and experience sufficient to evaluate the verification processes, working papers and associated evidence and recommendations made by the audit team. It is expected that this level of qualification is equivalent to that of a Lead Auditor in the respective field."	Amendment has been made in the revised draft version according to this proposal.	BM Trada John Lovelock
PG 32 3.1.4.1		d) ensure that trainers of auditors: i.; ii. hold a <u>formal qualification as ISO 9001, ISO 14001, or OHSAS 18001 auditor</u>	Does this mean the person has pass the course or be registered as an auditor in one of the systems listed?	The revised draft version of the STD specifies that trainers of auditors need to be qualified on the same level as auditors. As regards ISO: they either need a certificate proving that they have successfully passed a course on one of the named ISO scopes or they have passed a course on ISO 19011 (as specified in the respective annex of STD 20-001)	SGS South Africa Gerrit Marais
3.1.41a) ii	G	We think the certification decision maker has to be at least a Lead auditor, who is employed by the CB because, a external auditor couldn't be responsible for this (-> It is not possible to outsource the certification decision to an external auditor because an external auditor is not independent (A external auditor gets more money for a fast (=unqualified) certification		The term "lead auditor" has been replaced by "auditor" only as it appears that this term is neither consistent nor clear across all CBs and being used in very different ways. The certification decision cannot be taken by a person who is not	Tuev Nord Carsten Kahlert/ Martin Barnack

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		decision. So an external auditor has no the time to spend 3 hours for a certification decision). A person who is no lead auditor is not able to make a qualified certification decision. So we agree to 4.5.3		staff of the respective CAB.	
3.1.4.1 a ii)	G	It is not clear what “at the level” means. In addition please redesign this clause in line with 17021 7.2.9 Decision makers do not need to be “approved” lead auditors as their role in a certification process is totally different as of auditor. Of course they should have equal qualification but not necessary need to have the status of a lead auditor.	The certification decision maker(s) that take the decision on granting, maintaining, renewing, extending, reducing, suspending or withdrawing certification shall understand the applicable standard and certification requirements, and shall have demonstrated competence to evaluate the audit processes and related recommendations of the audit team.	Wording has been amended to be more specific and clearer.	GFA Matthias Rau
3.1.4.1.a.i i	T	“the certification decision maker(s) shall be qualified at the level of a lead auditor”; Is this suggesting that the certification decision maker does not actually need to be a lead auditor? If so, that is a good level of flexibility, especially given that the requirements for maintaining lead auditor status are proposed to be strengthened.	Clarify and allow for implied flexibility	Wording has been amended to be more specific and clearer.	SCS Global Services Vanessa Ellis
Page 32	G	Proposal for certification decision makers Agree. With the definition of the requirements needed for the decision makers, the process seeks to ensure greater transparency and training due to their careful and detailed work. However, this may result in increase in audit costs.		Ok	IPEF / CMPC / Klabin SA/ Lwarcel Celulose Ltda/ Arauco Florestal Arapoti / TTG Brasil Investimentos Florestais Ltda

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Page 32	T	Propuesta para encargados de la decisión de la certificación. Creemos que este cargo es de alta responsabilidad en las EC, debe ser el más capacitado y el con mayor poder de decisión, incluso por sobre el auditor líder o auditor jefe. Puede cumplir las funciones del revisor de solicitudes y no otro cargo. We believe that this position has high responsibility in the CB, which requires more training and has higher decision making power, even than the lead auditor or team leader. He can perform the functions of application reviewer and no other task.			CMPC Augusto Robert
3.1.4.1.b	E		A new sub-clause should start at “For the selection...”	Comment was considered (the structure of the complete part 3.1 has been revised).	SCS Global Services Vanessa Ellis
Proposal for certification decision makers	G	Any competency requirements that start with “to be able to” are difficult to audit. The suggestions are simply a more specific way of stating what is already stated in 3.1.4.1.a.ii. How would this add value to the existing language? Furthermore, how would adding this text “blow up the core STD text a lot”, as the stakeholder note says?	The existing language is sufficient.	Wording was amended and in parts moved to the annexes in order to be clear and unambiguous.	SCS Global Services Vanessa Ellis
Page 32, 3.1.4.2 a	T	Training especially on the national FM-standards is needed to harmonize the auditors work on national level.	identify initial and continuous training needs on all relevant FSC normative documents especially on the national FM-standards , certification processes, requirements, methodologies, activities, other relevant certification scheme requirements, the history and objectives of FSC and	The aspect of National Standards has been considered in the revised draft version.	FSC Germany Elmar Seizinger

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
			relevant changes to the FSC system (i.e. foremost but not limited to new or revised normative documents);		
Page 32		See comments above, it is important to not blow up the text further. It can be more concentrated and general. At the same time it is important to include all being part of the certification process performing their different functions.		Parts of 3.1 were moved to annexes in order to keep 3.1 concise	FSC Sweden Lina Bergström/ Eva Mattsson
3.1.4.2		If we have all these requirements for training d)ii seems to be a bit of overkill.	Take out d)ii	Was moved to an annex for part 3.1. not to be blown up too much.	FSC Sweden Lina Bergström/ Eva Mattsson
3.1.4.2.d.i	T	Is “formal qualification” the same as obtaining a certificate that the training course was passed? Or is it expected that the auditor will also be qualified as an ISO 9001, ISO 14001, or OHSAS 18001 auditor? If the latter, that is much too limiting.	Modify the clause to be clearer.	Wording was amended to be clear that attending a training in ISO and its successful completion (certificate) is enough	SCS Global Services Vanessa Ellis
3.1.4.2.d.vi	T	Trainers of auditors should not be required to be impartial regarding training participants. Trainings range from simple updates to full auditor qualification training. When training contract auditors, any staff trainer is going to have some level of influence on personnel decisions. Additionally, any trainer should be qualified to conduct trainings, so it should not matter who they are training. The technical manager should be able to train their direct reports, and a direct report should be able to train their manager on a topic they have gained expertise in.	This should be revised to be more specific, or should be removed as it is not feasible.	The aspect of impartiality will be removed	SCS Global Services Vanessa Ellis
3.1.4.2.e	T	“Examinations” is too limiting. Exams are not always the best way to engage students, especially those with specialized knowledge who need to practice applying it critically. Additionally, the part of the clause starting “The design of examination requirements...” is unclear and should	Add “and exercises” to the clause. Change “The design...” to a sub-clause and add an explanatory note to clarify what FSC is looking for. Alternatively, rephrase.	Comment was considered and integrated in an amended wording for the implementation of training.	SCS Global Services Vanessa Ellis

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		be its own sub-clause. Which exams are we comparing? How does one compare “difficulty”? How does one compare “the validity of fail/pass decisions”? CBs do not typically employ someone with a specialized degree in education, so these ideas will be interpreted very differently if not clarified.			
3.1.4.2.h	T	This clause requests that all information required in Clause 3.1.6 be submitted to ASI. This amounts to the entire body of records we keep on our auditors, including all the training courses they have taken, their performance reviews, a list of all the contracts and agreements they have signed, etc. This is far too much information to submit to ASI. That level of detail is more appropriate at an office audit. Currently, we submit a list of auditors including their qualifications, languages, region, and scope. That has provided more than enough detail for ASI's needs in the past.	Modify clause to require only name, qualifications, languages, region, and scope to be submitted to ASI.	STD 20-001 requires CB's to register their auditors with ASI. Requirements for the registry will be specified in a procedural document by ASI and will be open for consultation	SCS Global Services Vanessa Ellis
3.1.4.2 (ii)	T	Trainers of auditors should also be permitted to hold a ISO 19011 qualification (as Lead Auditors as per (i) may hold ISO 19011 qualification and not the other formal ISO standard qualifications)	Add “..or ISO 19011 qualified auditor”	A certificate for a course in ISO 19011 is also possible (revised 2 nd draft)	Soil Association Woodmark Meriel Robson
Part 3, clause 3.1.4.2.d), vi., page 33	T	Trainer's impartiality in relation to trainee It means that the trainer can't be a supervisor of the trainees. It may create the additional cost for CBs as most experienced trainers may have other responsibility in CBs. In any case the qualification decision is done based on the exam or test and the risk of the trainer's subjective decision is significantly reduced	Clause should be deleted	The Clause was removed	NEPCon Tigran Martirosyan
Page 33, 3.1.4.2.d.i	T	Trainers should be required to have taken ISO course, but should not be required to hold a “formal qualification as ISO Auditor”. In order to be a qualified ISO auditor, one needs to conduct ISO audits. This is a significant disadvantage for CBs that do not audit to ISO standards. It is also indicative of ‘checkbox’ auditing where trainer is qualified based on qualification as ISO auditor, rather than performance-	Trainers shall have completed an <i>ISO 9001, ISO 14001, or OHSAS 18001</i> training course. Note: Trainers do not have to hold formal ISO auditor qualification.	Was considered in the proposed way	Rainforest Alliance Alison Lesure, Laura Terrall

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		based assessment as trainer and/or of their FSC auditing knowledge.			
Page 33, 3.1.4.2.d. vi	T	Ensure trainers are: impartial in relationship to the training course participants (i.e. shall not be involved in personnel decisions related to their trainees In many cases, supervisors are responsible for the training of their direct reports and also responsible for personnel decisions. We do not support the interpretation of this clause, as impartiality can be controlled based on training material content, presence of other trainers, and the grading/scoring of exams/exercises regardless of whether trainer is also involved in trainees personnel decisions.	Remove i.e. clause.	Impartiality issue was removed	Rainforest Alliance Alison Lesure, Laura Terrall
3.1.4.2 d	t	In the current version of the 20-001 (Annex 2 1.2 Note) it is only said that the trainers of the ISO training shall be impartial. The color of the current version implies that the version in the draft has always been in the standard. This is very misleading. FSC Certification and training of auditors in the context of FSC is a very sensitive issue. Most permanent staff of our CB carries out training and is involved in personal decision. We would not be able to conduct trainings anymore by ourselves and lose personal that is involved in training for more than 10 years. This cannot be the intention of strengthen the training of auditors. Restriction in the requirements for trainers should be addressed on the level of competency and not by administrative aspects (status as auditor, personnel decision) to allow proper and sophisticated training.	d) Ensure that the trainers of auditors are competent for the training they perform.	Requirements for trainers were revised in a way to address the assurance of quality and competence.	GFA Matthias Rau
3.1.4.2 (h)	T	Auditor registry	Limit information stored to CB Lead auditor name, area of operation	STD 20-001 requires CB's to register their auditors with ASI.	Soil Association

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		Disagree with information held by ASI including all the information under Clause 3.1.6 as this can be assessed during Office audits by ASI, there is no need to unnecessarily duplicate storage of data. This is a third example in this standard of ASI taking on CB role (see also complaints and impartiality committee comments). Permission from Auditors may be needed for ASI to store data as specified under 3.1.6 under data protection anyway eg. information about qualifications, recorded conflicts of interest etc.	- It is not the intent of the revised standard that ASI takes on the role of the CB. - Centralized Impartiality Committee was an idea of the WG to test with stakeholders FSC database of complaints is to be used by FSC (QAU)	Requirements for the registry will be specified in a procedural document by ASI and will be open for consultation.	Woodmark Meriel Robson
Page 33	G	Information of lead auditors should be expanded so information related to their qualification for example, can be easily found in a single database.		The term “lead auditor” has been taken out – especially because it appeared to be very misleading and applied in very different ways across all CBs	IPEF / CMPC / Klabi SA/ Lwarcel Celulose Ltda/ Arauco Florestal Arapoti / TTG Brasil Investimentos Florestais Ltda
Page 33 Clause 3.1.4.2	T	No, we do not agree with the proposal – This is intellectual and commercial property of each CB. Also would infringe data protection legislation. Motion 52 does not say a word about the public availability of the auditors. We are happy to provide auditor information only to ASI on request.	Please remove this consultancy note and do not incorporate this rule.	STD 20-001 requires CB’s to register their auditors with ASI. Requirements for the registry will be specified in a procedural document by ASI and will be open for consultation. “Public” availability of (some) auditor data (to facilitate “exchange” of auditors among all CBs (if desired) was dropped.	BM Trada John Lovelock
Page 33	T	Auditor registry Disagree with this, as above see comment under		STD 20-001 requires CB’s to register their auditors with ASI. Requirements for the registry will	Soil Association Woodmark

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		3.1.4.2 (h). This would be even more worrying if the database is made available to all CBs as is suggested by the clause “The FSC Auditor Registry could provide all CBs access to a pool of qualified auditors..”. Commercial reality is CBs devote considerable resources to training auditors and some may wish to limit auditors not to work for other CBs.		be specified in a procedural document by ASI and will be open for consultation. “Public” availability of (some) auditor data (to facilitate “exchange” of auditors among all CBs (if desired) was dropped.	Meriel Robson
Page 33		An Auditor registration is very important. Every CB should send the information why an auditor is terminated by a CB to ASI. But it is also important, that only ASI has access to this data base for auditor registration and no other CB, because this is a highly sensitive data. Also, it should not be created as a tool used by CBs for recruiting purposes because many CBs will refrain from fully train new auditors with long term contracts but will instead only try to hire freelancers or will headhunt from other CBs. Some CBs might have other (better) ways, or policies, to recruit staff than others. This should not be streamlined without need.		See above	Tuev Nord Carsten Kahlert/ Martin Barnack
Page 33	G	SCS is strongly opposed to this proposal. CBs do not want to share auditors as a general rule. The training programs developed by each CB are proprietary and costly, so the idea of a common pool of qualified auditors which each CB adds to is not desirable. Additionally, this could mean that auditors control the price of an audit since they become the competitive resource, which would lead to unaffordable audits. Finally, auditors are trained not just on auditing techniques and FSC standards, but also on individual CB procedures and interpretations. It would be very difficult for auditors to maintain competency for multiple CBs at once.		See above	SCS Global Services Vanessa Ellis
Page 33		OK, maybe it can be of help.		See above	FSC Sweden Lina Bergström/ Eva Mattsson

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Página 33	T	Información sobre el registro de auditores De acuerdo Ok		See above	CMPC Augusto Robert
Page 33		Acceptable but needs to be efficient in terms of CB reporting the auditor information.		STD 20-001 requires CB's to register their auditors with ASI. Requirements for the registry will be specified in a procedural document by ASI and will be open for consultation. "Public" availability of (some) auditor data (to facilitate "exchange" of auditors among all CBs (if desired) was dropped.	Rainforest Alliance Alison Lesure, Laura Terrall
PG 33		Stakeholder consultation note (for information): According to the current standard lead auditors shall be registered with ASI. To date this only means that ASI maintains an excel file where auditors are listed. This requirement is planned to be expanded. It still needs to be determined how the information will be collected (whether via the FSC Database or directly provided to ASI) and whether and how it will be verified by ASI. <u>The FSC Auditor Registry could provide all certification bodies access to a pool of qualified auditors</u> and is one element of the GA Motion 52.	Last sentence: This may result in CBs "stealing" auditors for other CBs. I am not sure if this will be acceptable	See above	SGS South Africa Gerrit Marais
Page 33 Auditor registry	G	Take care that we don't over burden the system and that we create an competition pool for cb's to angle in. That ASI has a record should suffice.		STD 20-001 requires CAB's to register their auditors with ASI. Requirements for the registry will be specified in a procedural document by ASI and will be open for consultation Concern about too many data/administrative burden has been taken up and will be consider in the further	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 33		In favour this has potential to add to the flexibility and	Agree!	Public" availability of (some)	WWF

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		capacity of all CBs, which is direfully needed particularly in certain geographies where there is limited CB presence.		auditor data (to facilitate “exchange” of auditors among all CABs (if desired) was dropped because there was too much concern by a good number of CABs	International
3.1.4.2 h	T	We have a own central database for all SGS auditors registrations and for saving their records. This database covers all certification schemes and all auditors worldwide. It is a key element of our own management system. We will supply auditor registration records to ASI on request. However, we do not support again an additional Database with auditor records. This would just be double work. ASI can check the correctness of auditor registration until their audits, but it is not the function of the accreditation body to keep control of all registered auditors under certain schemes. This goes too far. Finally such a central databse can quickly raise questions relating confidentiality.	Cancel 3.1.4.2 h	STD 20-001 requires CAB’s to register their auditors with ASI. Requirements for the registry will be specified in a procedural document by ASI and will be open for consultation. Concerns about duplications and too much administrative burden has been heard and will be considered with specifying more the details of the registry. The confidentiality issue will be given high priority.	SGS Christian Kobel
3.1.4.2. h	g	Providing Records only creates an administrative burden to ASI and the CBs. Auditor Qualification is checked during every ASI office audit and every other audit ASI is conducting. If this is now managed outside regular audit the audit time should be reduced.		STD 20-001 requires CB’s to register their auditors with ASI. Requirements for the registry will be specified in a procedural document by ASI and will be open for consultation. Concerns about duplications and too much administrative burden has been heard and will be considered with specifying more the details of the registry. The public consultation will give opportunity to further discuss the concerns focusing on the respective specific parts of the to be elaborated procedure document	GFA Matthias Rau

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
3.1.4.3.a.i ii	T	What does this sub-clause mean? It is very confusing and sounds difficult and unnecessary.	Remove or rephrase substantially. Provide explanatory note.	Comment was taken in consideration and wording has been changed.	SCS Global Services Vanessa Ellis
Page 34, 3.1.4.3.b	T	The witness audit requirement should be limited to lead auditors once every 3 years. There are many auditors not at the 'lead' level that are crucial in the FSC system primarily to round out FM audit teams. It will be extremely costly to the system to include auditors in the on-site witness program.	Auditors (not lead auditors) should be evaluated on a regular basis, but not through on-site witness.	Apparently there was a misunderstanding with the term of auditor and also lead auditor. When the normative document refers to auditors, it is about the persons who audits against FSC's schemes (FM or COC) and not to refer to "technical experts".	Rainforest Alliance Alison Lesure, Laura Terrall
3.1.5 b and c	T	We would prefer if b) and c) just apply for auditors therewith also the technical reviewers are covered. Otherwise we would have to indentify all persons in the back offices, with limited responsibilities, who are my be at any time or as a deputy, print out the certificate document or a proposal and send it to the client.		Comment was taken in consideration for the revision of the draft STD.	SGS Christian Kobel
3.1.5	E	Isn't this covered elsewhere in the text and can be taken out here?		Text passage was checked and redundant parts were taken out.	FSC Sweden Lina Bergström/ Eva Mattsson
3.1.6		Information on auditor registry See above comments – some of this information is personal	Yes CB should retain this info but ASI should not retain it all	STD 20-001 requires CB's to register their auditors with ASI. Requirements for the registry will be specified in a procedural document by ASI and will be open for consultation.	Soil Association Woodmark Meriel Robson
3.1.6	T	The clause requests records to be maintained for "all certification body personnel involved in work related to the FSC certification scheme". This is vague. Who does this cover? Anyone who interacts even the slightest with the certificate holder? What about someone who files reports and invoices from the	Clarify and allow flexibility	This is just moved from another part of the old STD version to another place in the new STD. It will be discussed if the "all CB personnel" is not misleading	SCS Global Services Vanessa Ellis

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		auditors?		and/or not even relevant in this context. Revision will be considered	
3.1.6.d	T	Not all personnel who work in the FSC program at each CB undergo “on-site assessments/ peer reviews”. For example, SCS has several coordinators whose job it is to scope audits, and they don’t have on-site assessments. They have annual performance reviews, but that is covered by 3.1.6.e.	Clarify that this may not be applicable to all personnel.	See above	SCS Global Services Vanessa Ellis
PG 34 3.1.6		The certification body <u>shall maintain records of all certification body personnel involved in work related to the FSC certification scheme</u>. The records shall include a means to confirm the competence, qualification and training status of personnel. The content of the <u>records shall include</u>, but not be restricted to the following: a) name and address; b) position(s) currently held; c) qualification level and progress documented through CV and reports including but not limited to scope (FM, COC, CW), languages spoken, training courses passed, and years of experience in relevant area; d) number and respective year of on-site assessments/peer reviews; e) results of monitoring processes and evaluations (performance appraisal report); f) list of agreements and contracts signed with the certification body including but not limited to confidentiality agreement(s), declaration(s) of potential and identified conflict(s) of interest, work contract(s), authorizations; g) ensure that all relevant personnel record documents contain information about the time of the latest update.	It indicates ALL personnel and the records SHALL be maintained but point d) cannot be applicable to admin personnel?	Comment was considered and clause was revised.	SGS South Africa Gerrit Marais

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Page 35 Subcontractors	G	Why does the working group on one hand allows sub-contracting and then tries to “over” regulated it like it really doesn’t like it. The fact that there are certifications schemes that do allow it doesn’t force us to allow it to. Pick or choose. Or allow it and just say that The CB will all ways be the final responsible party and loses its licence to operate in the sub-contractor doesn’t meet or exceeds the requirements in this standard or just don’t allow it.	Delete the chapter on sub-contracting and don’t allow it.	The allowance of subcontracting (now called “outsourcing”) is an established but regulated practise in voluntary standard schemes such as FSC and in ISO standards. It creates the opportunity for certification bodies without global presence to achieve FSC accreditation and therefore ensures that not only the largest certification bodies can offer FSC certification. The option of outsourcing is kept in the standard.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Proposal for subcontractors	G	ISO 17065 does not use the term “subcontractor” but rather “internal resources and resources under direct organizational control” and “external resources (outsourcing).”	If the intent is to align the FSC language with ISO 17065, then the terminology has to be aligned and consistent.	The Working Group agreed to use the term outsourcing.	SCS Global Services Vanessa Ellis
Page 35	T	Proposal for subcontractors OK		Ok	Soil Association Woodmark Meriel Robson
Page 35		It is good that certification decisions can be subcontracted to other entities if the oversight and contractual relations are well made. This improves the possibility for a smooth and possibly more effective certification. It can also encourage CBs to cooperate in new areas or in areas with difficult conditions. Sometimes the term subcontracting is also used for relations lie a CB is using a laboratory for chemical tests, or other expert functions the CB doesn’t have. These kind of relations has also to be defined either as subcontracting or any other term.		The Working Group agreed to use the term outsourcing.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 35		Agreed		Ok	WWF

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					International
Page 35		In cases of subcontracts, it should be explicit that these cannot have been consultants for the Company to be evaluated within a period of time to be defined.		The requirements applicable to the CB are also applicable to the body providing outsourced services. This is reinforced with the legal agreement between both parties, see Clause 3.2.3a)	WWF International
Page 35	G	Proposal for subcontractors It should be understood that CB's subsidiaries are established to comply with local legislation in countries regarding personnel employment, concluding the service agreements and setting payments from clients, tax regulation and it doesn't affect to the certification activities as such. It is not the real subcontracting. All the staff who is involved in the certification activities is managed under the same organizational structure. The organizational structure of each CB shall be evaluated separately to decide if the affiliates can be applied to the subcontracting requirements or not	Propose that the "subcontracting" under the same organizational structure is more in accordance with ISO 17065 and not all FSC requirement, like trademark use or number of managed certificates are applied to affiliates, not only certification decision.	All bodies that are not FSC accredited need to conform to the requirements as specified for bodies providing outsourced services, but it should be easier for affiliates to conform to the requirements.	NEPCon Tigran Martirosyan
Page 35	T	Propuesta sobre subcontratistas No estamos de acuerdo con la subcontratación sin dependencia o control organizacional de la entidad de Certificación. We do not agree with subcontracting without dependency or organizational control of the CB.	El aspirante a certificar contrata a una EC de acuerdo a una serie de análisis y no se pueden entregar a un tercero. Solo si se especifica en este documento que cualquier subcontratación deberá tener el consentimiento expreso del cliente An applicant for certification contracts a CB based on a thorough analysis and this should not be delivered by a third party. Only if specified in the contract that any subcontracting must have the consent of the client.	The client has the opportunity to object outsourced services according to 3.2.6e). The allowance of subcontracting (now called "outsourcing") is an established but regulated practise in voluntary standard schemes such as FSC and in ISO standards. It creates the opportunity for certification bodies without global presence to achieve FSC accreditation and therefore ensures that not only the largest certification bodies can offer FSC certification.	CMPC Augusto Robert
Page 35		The only concern is with subcontractor including sister	Having an agreement to follow CB	All bodies that are not FSC	Rainforest

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		companies that are under organizational control of the CB. This will mean many of the same requirements apply including the need for a legally binding agreement. (Please note in our case, ASI already applies the affiliate office audit sampling equation to our “regional offices” that are under our organizational control, but have separate legal entities established for employment purposes.)	processes should be satisfied through individual employees signing employment contracts with the CB.	accredited need to conform to the requirements as specified for bodies providing outsourced services, but it should be easier for affiliates to conform to the requirements	Alliance Alison Lesure, Laura Terrall
3.2.1 and 3.2.3 a)	E	Please try to use more consistent wording “applicable provisions of this and other FSC standards and requirements” in 3.2.1 and compare that with “relevant requirements” in 3.2.3 a). This makes the text very confusing.	Please use defined terms	Agreed.	FSC Sweden Lina Bergström/ Eva Mattsson
3.2.2	G	This is very important, that it is not allowed to subcontract the certification decision to external outsourcing partners.		Ok	Tuev Nord Carsten Kahlert/ Martin Barnack
3.2.3	G	The 3.2.3 can covered by procedures of a CAB with multiple sites and with control by ownership. (see also STD-40-003 V.2.1 for CH were a consent form /contract between the central office and the sites any more for this case)	Change definition of Subcontractors and exclude CAB with multiple sites and with control be ownership.	All bodies that are not FSC accredited need to conform to the requirements as specified for bodies providing outsourced services, but it should be easier for affiliates to conform to the requirements.	SGS Christian Kobel
3.2.3.d	T	“...who shall be subject to regular performance review (incl. on-site witnessing) by the ... certification body;” First, not all subcontractor personnel need to undergo on-site witnessing (see comment on 3.1.6.d above, which applies to subcontractors as well). Second, subcontractor personnel should not be subject to regular performance reviews by the CB. This is covered during internal audits.	Change “and the certification body” to “and/or...”.	Based on discussion at the Working Group level the clause was amended to specify that the performance of the personnel shall be reviewed by the body that provides the outsourced service, but also that on-site witness audits shall be sampled by the CB.	SCS Global Services Vanessa Ellis
3.2.3 d):	G	This sentence could be misinterpreted. Only the CB should witness the subcontractor. This sentence		Based on discussion at the	Tuev Nord

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		sounds like also the subcontractor is allowed to control its own work. So there should be written that the witnessing of the subcontractor has to be performed by an employee of the accredited CB and not by other subcontractors or by a separate legal entity (including sister companies, subsidiaries). The witnessing is one of the essentials for ensuring the integrity of the FSC system.		Working Group level the clause was amended to specify that the performance of the personnel shall be reviewed by the body that provides the outsourced service, but also that on-site witness audits shall be sampled by the CB.	Carsten Kahlert/ Martin Barnack
3.2.3.g	T	This clause doesn't make sense for those "subcontractors" who are subsidiaries of the CB and essentially have the same business name, corporate logo, and website.		All bodies that are not FSC accredited need to conform to the requirements as specified for bodies providing outsourced services, but it should be easier for affiliates to conform to the requirements.	SCS Global Services Vanessa Ellis
3.2.3.i and 3.2.4	T	FSC-STD-50-002 does not require subcontractors' use of FSC trademarks to be authorized by FSC. Only the CB needs to authorize and approve.	Modify either 20-001 or 50-002 so that they are consistent.	ALL trademark users need to be authorized by FSC. But it is up to CB to decide whether they would like their subcontractor to be able to promote their services with their name, in which case they will send an application to FSC. We do not accept applications directly from service providers. After this step, CB can approve the actual artwork. This will be added also to FSC-STD-50-002.	SCS Global Services Vanessa Ellis
Part 3, clause 3.2.3 i), page 36	T	Prohibit to use FSC trademarks by CBs subcontractors without FSC approval It shouldn't be relevant to companies under the organizational control of CB, or owned by the same owner. If the management system of subsidiaries and CB are integrated under the same requirements, then there is no risk that CB approve the trademark use internally	The wording should be amended to exclude CB's subsidiaries from the requirement	All bodies that are not FSC accredited need to conform to the requirements as specified for bodies providing outsourced services, but it should be easier for affiliates to conform to the requirements.	NEPCon Tigran Martirosyan
Part 3, clause 3.2.3 j),	T	See explanation above	The wording should be amended to exclude CB's subsidiaries from the requirement	See above.	NEPCon Tigran

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
page 36					Martirosyan
3.2.4	G	Trademark use can be covered by procedures of a CAB with multiple sites and with control by ownership. As long as the Entities of the company are communicating under the same brand ("SGS") it should not be necessary to register all offices.	Change definition of Subcontractors and exclude CAB with multiple sites and with control be ownership.	All bodies that are not FSC accredited need to conform to the requirements as specified for bodies providing outsourced services, but it should be easier for affiliates to conform to the requirements.	SGS Christian Kobel
3.2.5	G	We do not see the additional value if ASI is immediately informed about involvement of additional offices in case of CAB with multiple sites and with control by ownership. ASI can check until annual audits if the CAB follow its own procedures relating collaboration and involvement of additional local offices.	Change definition of Subcontractors and exclude CAB with multiple sites and with control be ownership.	ASI confirmed that this Clause should be kept.	SGS Christian Kobel
3.2.6	G	Such a requirement would have significant impact on the structure of the SGS Accreditations. We observe that the risk of shortfalls in managing the certification is higher in offices with a low number of certificates. Offices with a high number of certificates have mostly better qualified personnel, because it is their daily business. SGS spitted up already the accreditations, but by regions with similar cultural background and language and not by number of certificates in a country.	Change definition of Subcontractors and exclude CAB with multiple sites and with control be ownership.	Considering stakeholder feedback this Clause has been deleted.	SGS Christian Kobel
Page 36		Proposal on threshold for subcontractors Support the decision to exclude the clause from the standard if the internal audit is strong.		Considering stakeholder feedback this Clause has been deleted.	NEPCon Tigran Martirosyan
Page 36		Agree!		Considering stakeholder feedback this Clause has been deleted.	FSC Sweden Lina Bergström/

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					Eva Mattsson
Page 36		Agreed with the Working Groups conclusion.		Considering stakeholder feedback this Clause has been deleted.	WWF International
Page 36	G	Proposal on threshold for subcontractors Strongly agree that 3.2.6 shall be deleted. This was also agreed in Working group. Any issue is not about numbers of certificates but about subcontractor relationships and control / supervision. I don't see the purpose of having specific numbers.	delete	Agreed.	Soil Association Woodmark Meriel Robson
Page 36	G	RA agrees with the preliminary conclusion that this clause is not necessary and therefore should be removed. Subcontractors are subjected to internal CB audits and ASI audits to ensure conformance. The existing thresholds are arbitrary and not based on performance metrics.		Considering stakeholder feedback this Clause has been deleted.	Rainforest Alliance Alison Lesure, Laura Terrall
Page 36	G	SCS agrees that the limitation on number of certificates a subcontractor can manage should be removed.		See above	SCS Global Services Vanessa Ellis
Page 36	T	Propuesta sobre límites para subcontratistas No por igual razón que anterior, si y solo si, si son bajo el control organizacional. Not for the same reason as stated above, if and only if they are under organizational control.		Bodies providing outsourced services need to conform to FSC requirements. It is the responsibility of the CB to ensure that this takes place (whether or not the outsourced body is an external body or an affiliate). Considering the stakeholder feedback the threshold was removed.	CMPC Augusto Robert
3.2.6	G	The threshold number should be maintained but should be not reduced. Here should be a difference between "normal" (independent) subcontractors and sister companies and subsidiaries. For sister companies and subsidiaries, there should be no threshold number of certificates, so there should be no change compared to		Such a differentiation between subsidiaries and other bodies providing outsourced services was discussed but not agreed. Ultimately the CB needs to make a risk analysis and decide with	Tuev Nord Carsten Kahlert/ Martin Barnack

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		the past.		which bodies providing outsourced services to engage with.	
3.2.6	T	It is simply not feasible and economically possible to expect an organisation like SGS (and all the other big CBs) to register a separate accreditation for affiliates that manage more than 500 certificates. There is no justification for this since SGS has 100% control through centralised systems of the operations of all affiliates. This is simply not logical and shows a poor understanding of how certification services are managed and controlled in multi-national companies.		Considering stakeholder feedback this Clause has been deleted.	SGS South Africa Gerrit Marais
Page 36	G	Proposal on threshold for subcontractors It is not clear from where these numbers were taken and even though the creation of limits can be important, in this case does not guarantee the service quality.		The numbers of this Clause originated from a calculation of the average number of certificates managed by CBs and the assumption that the body providing outsourced services should not be larger than the average CB. Considering stakeholder feedback this Clause has been deleted.	IPEF / CMPC / Klabin SA/ Lwarcel Celulose Ltda/ Arauco Florestal Arapoti / TTG Brasil Investimentos Florestais Ltda
Page 36	G	Idem see above. (Delete the chapter on sub-contracting and don't allow it)		Considering stakeholder feedback this Clause has been deleted, but the chapter is kept (and amended).	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
3.2.7.b	T	This sub-clause is redundant to Clause 3.2.1, which already requires personnel of subcontractors to follow	Remove sub-clause.	Clause 3.2.1 is quite broad, but this Clause makes a specific	SCS Global

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		impartiality and confidentiality.		emphasis on impartiality. The wording was amended.	Services Vanessa Ellis
3.2.7	T	b) Vague, please rewrite c) Good d) Include what services they are subcontracted for e) Instead of only referencing it is better to describe what the content of the clauses are	Rewrite!	Some amendments have been made. In e) a reference to the clause specifying contractual details are included. It does not make sense to repeat all contents of the clauses here.	FSC Sweden Lina Bergström/ Eva Mattsson
3.2.7.f	G	Not sure what is expected to communicate.	Change definition of Subcontractors and exclude CAB with multiple sites and with control be ownership.	All bodies that are not FSC accredited need to conform to the requirements as specified for bodies providing outsourced services, but it should be easier for affiliates to conform to the requirements. Need to explain the structure of the CB and affiliates to the client.	SGS Christian Kobel
3.2.9	E	Take away "in their office", normally it is better to store electronical documents on the cloud or on safe servers. b) This is a long complicated sentence, simplify and divide in two sentences. c) Take away assessors and managers, it is enough with ASI	Rewrite!	Agreed. The Clause is captured in Clause 2.4.1 and in ASI's documents and therefore was deleted.	FSC Sweden Lina Bergström/ Eva Mattsson
3.2.9.a)	G	Same comment as under 3.2.3	Change definition of Subcontractors and exclude CAB with multiple sites and with control be ownership.	The Clause is captured in Clause 2.4.1 and in ASI's documents and therefore was deleted.	SGS Christian Kobel
3.2.9.c)	E	"Audit Scheduling" might be better understood than "Monitoring schedule".	"Audit Scheduling" might be better understood than "Monitoring schedule"?	See above	SGS Christian Kobel
3.2.9 c):	T	48 hours is too short. If on Friday afternoon ASI requires information, the deadline is expired on Sunday evening before even somebody reads the ASI message. 3 business days would be more appropriate.		See above	Tuev Nord Carsten Kahlert/ Martin

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					Barnack
Page 37 4.1.1	G	Is there a defined timeframe for providing this information?	Is there a defined timeframe for providing this information?	No, this is at the discretion of the CB.	FSC UK Rosie Teasdale
4.1.1	E	Providing a copy is in my understanding no in line with the current development. Save paper.	The certification body shall provide the applicant with all the necessary information on the certification process and the certification requirements.	Agreed, amended accordingly.	GFA Matthias Rau
4.1.1	T	It would be good if the CB also gave information about FSC to the applicant, not only about the certification process. This can for example be about the National partner, about the possibility to be a FSC member and possibly about the market for FSC products.	Include general FSC information in the application information.	This is not the role of the CB.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 38	G	Information on FSC Database See the value to FSC and the network in making this data accessible but question whether it should be publicly displayed	See the value to FSC and the network in making this data accessible but question whether it should be publicly displayed	Ok	FSC UK Rosie Teasdale
Page 38	T	Information on FSC Database Ok		Ok	Soil Association Woodmark Meriel Robson
Page 38	G	FSC should ensure that the information in the website of certified organizations must be updated and available by CBs in the planned time.		Ok	IPEF / CMPC / Klabin SA/ Lwarcel Celulose Ltda/ Arauco Florestal Arapoti / TTG Brasil Investimentos Florestais Ltda

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Page 38	G	Agreed		Ok	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 38		Agreed		Ok	Rainforest Alliance Alison Lesure, Laura Terrall
Page 38		OK		Ok	FSC Sweden Lina Bergström/ Eva Mattsson
Page 38		Agreed		Ok	WWF International
Page 38	T	Información sobre la Base de Datos FSC De acuerdo Ok		Ok	CMPC Augusto Robert
4.1.2	E	Decide where and how FSC is used. In the first part of the sentence it is used “certification” and in the second “FSC certification requirements”	Decide where and when FSC is used.	Agreed.	FSC Sweden Lina Bergström/ Eva Mattsson
4.1.3	E	management units Please give a definition of a management Units. In the 20-007 there are different definitions in the glossary		It was agreed at the Working Group level to not introduce this definition in this document, as they will be covered in the revised glossary.	GFA Matthias Rau

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
4.1.4	G	For most applicants, it will not be possible to identify all FSC products groups correctly already in the application . FSC-STD-40 004 V2-1, 2.1 and FSC-STD-40 004a are too difficult to comprehend for many applicants.		It should be possible at least to indicate the level 1 product group.	Tuev Nord Carsten Kahlert/ Martin Barnack
4.1.5	T/E	“Following data fields”?? What is that? b) Describe what the “Annual Administration Fee” is.	Include “Annual Administration Fee” in the terms and definitions	The sentence is amended. General terms should not be defined in this document.	FSC Sweden Lina Bergström/ Eva Mattsson
4.1.5	T	There is a required timeline of 10 days; however, it is unclear when this timeline starts. “After setting up the database entry” could presumably happen whenever the CB decides to do so. Therefore, this is a difficult clause to audit.	Change “After setting up...” to something more specific and measurable.	The Clause was amended to indicate a timeline of at least 30 days before the main evaluation.	SCS Global Services Vanessa Ellis
4.1.6	E	This clause is written for the applicant but it should be written for the CB.	It should read, “CB shall ensure that applicants obtain a License Agreement...”.	Agreed.	SCS Global Services Vanessa Ellis
4.1.6:	G	The sentence “...license agreement for the FSC Certification scheme before entering into a certification agreement...” should be changed as follows:“... license agreement for the FSC Certification scheme before issuing a certificate and a database entry”, so that it is adapted to 4.6.18	:“... license agreement for the FSC Certification scheme before issuing a certificate and a database entry	The Clause is kept unchanged, in line with the specification provided under the certification agreement Clause (1.2.3)	Tuev Nord Carsten Kahlert/ Martin Barnack
4.1.7:	G	“or other certification schemes” goes too far. Why should a CAB or FSC or ASI want to know about all applications or certifications against all kind of certification schemes not related to forest products (like medical, food, technical specification i.e. automotive, offset printing...)? Too much paperwork, no effect.	“or other forest management or forest product related certification schemes”	The reference to other certification schemes is what is required in the ISEAL Assurance Code.	Tuev Nord Carsten Kahlert/ Martin Barnack
4.1.7	T	Good! Does this also apply to members of group certificate?		No, in the context of this standard it only applies to the entity holding the certificate. We can consider including a similar obligation in the next revision	FSC Sweden Lina Bergström/ Eva Mattsson

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
				process of the multi-site standard, requiring the applicant members to disclose the information to the group entity.	
4.1.7	E	This clause is written for the applicant but it should be written for the CB.	It should read, "CB shall require the applicant to disclose ...".	Yes, amended.	SCS Global Services Vanessa Ellis
4.1.8 and 4.1.9	E	Describe what a CAR and a MU is (even if we know very well)	Add CAR and MU to terms and definitions.	General terms should not be defined in this document.	FSC Sweden Lina Bergström/ Eva Mattsson
4.1.8:	G	considering the results of other CABs to this extent would mean that the certification process starts with a biased position because older NCs already influence the certification process before it has even started. Furthermore, CABs could obstruct other CAB's work by delaying the submission of required information, or handing over incomplete documentation, which could cause a lot of unnecessary trouble between CABs. If at all required, this should be restricted to the audit report and NC report from the most recent audit of the previous CAB.	If at all required, this should be restricted to the audit report and NC report from the most recent audit of the previous CAB.	The Clause was amended to indicate that the certification body shall obtain the latest available audit report of the last five years from the applicant process.	Tuev Nord Carsten Kahlert/ Martin Barnack
4.1.8		Could you let me know where I can find the rules linked to what happens when a certificate expires. When can the certificate holder reapply for certification? Do they have to undergo a full evaluation? etc. This makes me realise there is a gap in the procedures in cases where CARs would lead to a suspension of a certificate.	It is something that should be thought through as the new CB may have weaker interpretation of the Major CAR issue from the former CB. I think some new rule where the CARs were leading to suspension but a certificate was then expired would precipitate e.g., a special audit, a year before the CH could reapply for FSC certification + special audit...	What we include as a safeguard is that the new CB needs to take into account the nonconformities raised by the old CB. But otherwise we have a voluntary certification scheme that also has to adhere to certain non-discrimination requirements (in line with ISEAL and ISO). We do have the mechanism of the Policy for Association, but otherwise cannot require a one year stop to certification.	M-env Greenpeace Judy Rodrigues/ Catherine Grant
4.1.8	T	Is there a requirement for the CB to disclose this information and what impact on confidentiality	Clarify	The clause was amended so that the client has to provide this	SGS

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		requirement? In reality this may cause competitive issues?		information.	Christian Kobel
Application for certification; clause 4.1.8; p. 38	T	Clarification requested: What does “consider” mean in this clause? Is the CB responsible for evaluating previous CARs issued from earlier certifications?	Provide additional explanation.	The Clause was amended, it is not obvious that “consider” means to take the nonconformities raised by the old CB into account.	Rainforest Alliance Alison Lesure, Laura Terrall
Page 39	G	Proposal application/certification history This makes sense; however, it is important that the burden of disclosure is on the client and not the CB		The clause was amended so that the client has to provide this information.	SCS Global Services Vanessa Ellis
Page 39		Good		Ok	FSC Sweden Lina Bergström/ Eva Mattsson
Page 39		Agreed		Ok	Rainforest Alliance Alison Lesure, Laura Terrall
4.1.9	E	If a process according to FSC-PRO-20-003 would be ongoing than this is a very strict limitation. So wording could be revised to allow applications.	4.1.9 The certification body shall reject applicants for certification of MUs or sites that are already covered by an active FSC certificate, except where a certificate transfer process according to FSC-PRO-20-003 is considered.	Considered it too vague. Ongoing would be mean that there is an agreement between CH and new CB to transfer according to FSC-PRO-20-003.	GFA Matthias Rau
Page 39	G	Agree with principle – but need to clarify at 4.1.9 that a suspended certificate is also considered an active certificate	need to clarify at 4.1.9 that a suspended certificate is also considered an active certificate	Yes, this is the intent. It was specified accordingly.	Soil Association Woodmark Meriel Robson
Page 39		considering the results of other CABs to this extent would mean that the certification process starts with a		The Clause was amended to indicate that the certification	Tuev Nord

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		biased position because older NCs already influence the certification process before it has even started. Furthermore, CABs could obstruct other CAB's work by delaying the submission of required information, or handing over incomplete documentation, which could cause a lot of unnecessary trouble between CABs. If at all required, this should be restricted to the audit report and NC report from the most recent audit of the previous CAB.		body shall obtain the latest available audit report of the last five years from the applicant process.	Carsten Kahlert/ Martin Barnack
Page 39	G	Agreed		Ok	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 39 Part 4 4.1	T	To properly resolve this issue please introduce a mandatory membership scheme for Certificate Holders. In such case one company will have one membership number on the database, so one certificate can be associated to that. Also this will help FSC to enforce companies' commitment to FSC Values and speed up AAF collection directly from each member.	Introduce FSC membership scheme.	Thank you for raising this idea, it is considered outside of the revision process.	BM Trada John Lovelock
Page 39		Agreed		Ok	WWF International
Page 39	G	Clauses 4.1.7 and 4.1.8 on page 38 doesn't have much sense as the process of certification of the applicant starts from the beginning and the current CB fully evaluates the client. If there is the doubt in calibration of CBs, it is the ASI job during accreditation audits to check and enforce that all CBs comply with the accreditation requirement without significant deviations. However, if the CH is currently certified (valid or suspended), it shall be taken into account and shall be	Clauses 4.1.7 and 4.1.8 should be deleted. 4.1.9 have sense.	4.1.7 is based on an ISEAL requirement. 4.1.8 takes a similar approach as the transfer procedure, to indicate certain issues that the CB should give special attention.	NEPCon Tigran Martirosyan

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		prohibited to have two certificates without proper transfer of the certificate from one CB to another.			
Page 39	T	Propuesta referente a solicitud/historial de certificación De acuerdo Ok		Ok	CMPC Augusto Robert
Page 39	G	Support the proposal	Support the proposal	Ok	FSC UK Rosie Teasdale
4.2.1 b)	T	This is difficult to sort out beforehand in all cases, take it away or make it softer. Maybe a request for a signed application, a contract?	Take away b) or make it softer. Include the request for a signed application and a contract.	b) is about “known” differences. The signing of a contract must be done before the main evaluation, otherwise it is at the discretion of the CB.	FSC Sweden Lina Bergström/ Eva Mattsson
4.2.1 d) and e), 4.2.2	T	4.2.1 d and e covers more or less the same as 4.2.2. Take away one of them.	Take away either 4.2.1 d) and e) or 4.2.2	Agreed, 4.2.2 is deleted.	FSC Sweden Lina Bergström/ Eva Mattsson
4.3.1	G	All interpretations of FSC standards are at the sole discretion of the FSC International Center Would FSC UK be unable to offer interpretations of its own National Forest Stewardship Standard?	Would FSC UK be unable to offer interpretations of its own National Forest Stewardship Standard?	The Clause is reworded to indicate that reference is made to interpretations on documents of the FSC normative framework (which excludes National Standards). In the case of National Standards, FSC UK may offer interpretations, but PSU has to approve such interpretations, to ensure consistency (where possible) of interpretations against National Standards.	FSC UK Rosie Teasdale
4.3.1	G	Clarify do interpretations on National Standards also to be issued by FSC IC rather than National Offices/Stdg working groups?	Clarify – I think they should be approved by FSC IC as there is a risk they could run counter to another FSC normative document (eg. an Advice	Yes, final approval is with FSC IC (see above).	Soil Association Woodmark

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
			note)		Meriel Robson
4.3.1	E	This sentence is not easy to understand. Please simplify and divide in two.	Please simplify and divide in two.	The Clause was amended.	FSC Sweden Lina Bergström/ Eva Mattsson
4.3.5	T	Vague sentence	Take it away.	The Clause was amended.	FSC Sweden Lina Bergström/ Eva Mattsson
4.3.7	T	The standard will have to spell out clearly what the exemptions are since this will lead to conflict between the CBs and ASI if the rules are not clear.		The new draft includes a specific proposal for stakeholder consultation.	SGS South Africa Gerrit Marais
Page 40	G	The “very few” operations is not clear, it may be considered as the percentage of certificate by CB or comparing to other CBs in the country? The rotation of the whole audit team will bring additional costs to CBs regardless the number of operations in the country. Usually CBs have a limited number of auditors in the country. Due to FSC requirement about language and residency it is not possible to use auditors from other countries. Then CBs shall double the capacity of auditors in the country to ensure the compliance with the full auditor group rotation. The aim of the requirement is to reduce the risk of over-familiarity. However, the cost of the requirement and the effect is not consistent as the risk of impartiality will be kept anyway as the service is provided by the same CB and there other more important overall risks of impartiality, e.g. payable auditing service provided to the client and financial dependence from the clients. It is not reasonable to increase the financial burden to CBs and therefore to CHs.	Clause 4.3.7 should be deleted.	GA Motion 66 needs to be implemented. The new draft includes a specific proposal for stakeholder consultation. FSC does not require that an auditor is resident in the country. In the case of FM audits one team member either has to be resident in the country or in a nearby country with similar forest conditions.	NEPCon Tigran Martirosyan

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Page 40	G	Suggest that 4.3.8 clarifies what would be acceptable justification for not rotating the auditor for CoC/CW	Suggest that 4.3.8 clarifies what would be acceptable justification for not rotating the auditor for CoC/CW	A clarification has been included.	FSC UK Rosie Teasdale
Page 40	T	This is clearly in the motion however should perhaps be further discussed where exemptions possible. For example in area where another CB has lots of certificates but we don't, and we do FM assessments with 3-4 team members we may rely on some of these team members to continue for more than 3 assessments, even if we are able to rotate the Lead Auditor	Team members (but not Lead Auditors) may be used for more than 3 years in areas where there are very few certificates issued by the particular CB.	The new draft includes a specific proposal for stakeholder consultation. The scope of the Clause is on auditors (excludes technical experts).	Soil Association Woodmark Meriel Robson
Page 40		- Information on GA Motion 66 on auditor rotation - Option for consultation	4.3.7 / 4.3.8 should probably apply to all audits not just FM audits.	Conclusion after the first round of consultation is to keep the current "should" requirement for COC and CW audits, also considering the discussion at the GA and the conclusion that the scope of the Motion is limited to FM.	M-env Greenpeace Judy Rodrigues/ Catherine Grant
Page 40		Motion 66 should apply to any types of audits		Conclusion after the first round of consultation is to keep the current "should" requirement for COC and CW audits, also considering the discussion at the GA and the conclusion that the scope of the Motion is limited to FM.	FSC Germany Elmar Seizinger
Page 40	G	It's okay to extend the intent of Motion 66, covering the rotation of auditors in all types of audit.		Conclusion after the first round of consultation is to keep the current "should" requirement for COC and CW audits, also considering the discussion at the GA and the conclusion that the scope of the Motion is limited to FM.	IPEF / CMPC / Klabin SA/ Lwarcel Celulose Ltda/ Arauco Florestal Arapoti /

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					TTG Brasil Investimentos Florestais Ltda
Page 40		We agree to the option to strengthen this for all kind of audits, also CW and CoC and take away the should requirements. The exemption in 4.3.7 can be expanded for all types of audits and additionally be expanded so that other types of limiting situations are covered as an example expertise auditors, language knowledge which is rare etc.		Conclusion after the first round of consultation is to keep the current “should” requirement for COC and CW audits, also considering the discussion at the GA and the conclusion that the scope of the Motion is limited to FM.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 40 GA Motion 66 Option	G	Yes, if we want consistency we should		Conclusion after the first round of consultation is to keep the current “should” requirement for COC and CW audits, also considering the discussion at the GA and the conclusion that the scope of the Motion is limited to FM.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 40 4.3.8	General	- Information on GA Motion 66 on auditor rotation - Option for consultation <i>Rotation of CoC auditors (“...should ensure that no client is audited by the same lead auditor on more than three (3) consecutive audits”)</i>	The stakeholder consultation note implies that the “should” regulation in 4.3.8 could potentially be strengthened.	Conclusion after the first round of consultation is to keep the current “should” requirement for COC and CW audits, also considering the discussion at the GA and the conclusion that the scope of the Motion is limited to FM.	M-econ Advanced Certification Solutions Wolfram Pinker
Page 40		The intent of motion 66 was to cover FM audits only and during the GA it was made clear by CBs that for COC this might not be practically possible. We suggest to incorporate the motion’s implementation as has been developed.		Yes, agreed. The conclusion after first round of consultation is to keep the current “should” requirement for COC and CW audits,	WWF International
Page 40		We don’t support this idea. There is a big difference between a FM and a COC audit. If this would be adapted to COC it could happen, that the normal		The conclusion after the first round of consultation is to keep the current “should” requirement	Tuev Nord Carsten

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		auditor for this client needs 5 hours audit + 1 hour travel time. The next auditor could need 5 hours audit + 10 hours travel time. In many cases there is no possibility to invoice this extra travel time to the client. At a COC-Audit there is no much influence on the integrity of the system by auditor rotation. In some regions there is only one auditor available.		for COC and CW audits.	Kahlert/ Martin Barnack
Page 40	T	Opción para consulta De acuerdo, excepto por NOTA: Esta cláusula no aplica a los expertos técnicos o locales. Ok, except for the Note: This clause does not apply to local or technical experts.	Por qué no expertos? Why not to experts?	The scope of the Motion is for auditors, which excludes technical experts, who are not allowed to make conclusions on conformities.	CMPC Augusto Robert
Page 40 4.3 Evaluation Clause 4.3.8	T	No, we do not agree with the proposal – There is no evidence suggesting the auditor rotation improves the rigor and effectiveness of forest management audits or any audit whatsoever. Also there is nothing showing that auditor rotation mitigates the risk of “familiarisation” with the client. This is a historic, over-precautious approach based on outdated ISO guidance from 2005, which does not even suggest rotating the auditors. If the familiarisation is an issue it should be identified by CBs as a risk and CBs should demonstrate how this risk is minimised (which may include rotation of the auditors). Auditor rotation is not recommended by ISO17065, it does not prevent familiarisation and actually decreases the effectiveness of the audit – simply the time is wasted for re-learning the context of an certificate holders operations over and over again (BM TRADA has got the evidence for that).	Please remove this consultancy note together with “should” requirement on the auditor rotation and do not incorporate this rule.	Conclusion after the first round of consultation is to keep the current “should” requirement for COC and CW audits. The requirement as such may not appear in current ISO documents, but is an established safeguard to the over-familiarity threat. Clarification has been provided on how to interpret the “should” in this context.	BM Trada John Lovelock
Page 40		As the ISO Guidance document is 10-years old and the rotation of auditors is not given as a mandatory recommendation would it be possible to have an	Here is already a well-written clause 1.4.6 on the risk of impartiality we can simply expand:	See above. The concerns have been raised at the Working Group level and it was agreed to keep the Clause (the deletion of the requirement is not	Rafal Andruszkiewicz

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		updated and fit-for-purpose approach? I think the ISO document does not identify the rotation of auditors as target itself and the intention of the guidance is to minimise the “familiarity threat”. What I understand is the rotation of auditors can be seen as one of the means to enhance auditors independence and impartiality. Therefore it would be reasonable to think the Certification Body should be allowed to use some alternative methods demonstrating the familiarity risk is mitigated. Currently we know there is no statistical (or any) evidence showing how the auditor rotation significantly reduces the familiarity risk. The only risk I have come across is the problem of ASI auditor incorrectly interpreting it as a “shall” requirement and dictating CB where and when to change the auditor. This certainly leads us nowhere as: 1 – ASI get the “should” requirement wrong, 2 – ASI actually compromise its own impartiality by dictating the solutions, 3 – we don’t know if the rotation actually works, 4 – we going into the grey area of exceptions and “concessions” . This just clouds the picture and make the rotation of auditors requirement meaningless. What I think rather than tightening-up “the auditor rotation requirement” even further let’s be more precise and develop the wording section 1.4 Impartiality. So in simple words the Certification Body would be required to identify, analyse and document ALL the risks including the familiarity. This, I think is more	...from... “1.4.6 The certification body shall identify, analyse and document risks to its impartiality on an ongoing basis. This shall include those risks that arise from its activities, from its relationships, or from the relationships of its personnel. However, such relationships may not necessarily present a certification body with a risk to impartiality.” ...to... “1.4.6 The certification body shall identify, analyse and document risks to its impartiality on an ongoing basis. This shall include those risks that arise from its activities, from its relationships, or from the relationships of its personnel with a specific consideration given to the familiarity threat. However, such relationships may not necessarily present a certification body with a risk to impartiality.”	supported).	BM Trada

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		practical approach for both CB and ASI as: 1) it will be clearer for CB to take actions on the identified risks - <u>which may include the rotation of auditors</u>, 2) ASI will have all the risks listed in one place, so they can follow them up during their assessments; As the familiarity is risk indicator in my opinion we should adapt this risk-based approach and not jump straight into conclusion of “3 audits and no-more!” Yes, I am aware of GA Motion 66, but let’s not rotate the auditors for the sake of rotating the auditors! I am sure the intention of GA Motion authors’ was to mitigate the familiarity threat, so why not give them a fit-for-purpose requirement in new FSC-STD-20-001 standard?			
4.3.8	General	The stakeholder consultation note implies that the “should” regulation in 4.3.8 could potentially be strengthened. In some regions with, e.g., less than 60 certified companies it is neither practical nor cost-efficient to maintain an auditor force of more than two in order to guarantee a reasonable degree of capacity utilization of those auditors. In some instances, as an exception, an auditor may not be rotated in a fourth year due to a potential unavailability (e.g., unexpected temporary absence for more than 3 months). Hence, the “should” approach is justified.		Conclusion after the first round of consultation is to keep the current “should” requirement for COC and CW audits.	GFA Matthias Rau
Page 40		We support keeping the “should”		Conclusion after the first round of consultation is to keep the current “should” requirement for COC and CW audits.	Rainforest Alliance Alison Lesure, Laura Terrall

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Page 40	T	- Information on GA Motion 66 on auditor rotation - Option for consultation I think any reasoning should be valid for all audits, and linked to a certification cycle. I am an ISO auditor, who agrees with the 3 yr limit because an ISO cycle is 3 yrs. The limit in FSC should be the same for FM and CoC (there is no justification for a difference), and should be the same as the FSC certification cycle – 5 yrs – and for all those in the audit team (including technical auditors).	Implement a 5 yr rotation period for all FSC auditors.	Conclusion after the first round of consultation is to keep the current “should” requirement for COC and CW audits, also considering the discussion at the GA and the conclusion that the scope of the Motion is limited to FM.	Capital Natural Ana Dahlin
Page 40		I support the general idea of changing auditors latest after 3 consecutive audits at COC level. However, the CBs must have the opportunity to allow more consecutive audits by the same auditor in justified cases, e.g. in case of highly complex company structures and application of several COC standards. In these cases it is beneficial when the auditor can use and extend his understanding of the companies processes in more than 3 audits to ensure the best technical quality of the audit.		Conclusion after the first round of consultation is to keep the current “should” requirement for COC and CW audits. Clarification has been provided on how to interpret the “should” in this context.	Auditor Jörn Ackermann Consulting Jörn Ackermann
40	G	SCS does not support this idea. We spend a lot of time and effort to ensure that our auditors are competent and remain objective and impartial. Limiting COC audits to one auditor every 3 years would severely limit growth into new markets. Additionally, it will increase the costs of audits due to needing to fly auditors from different regions (both in terms of financial cost and additional greenhouse gases from unnecessary transportation), which could in turn mean that COC companies drop out of the system.		Conclusion after the first round of consultation is to keep the current “should” requirement for COC and CW audits. Clarification has been provided on how to interpret the “should” in this context.	SCS Global Services Vanessa Ellis
Pg 40	T	Disagree with option to include also for COC and CW audits – in some areas difficult for one CB to locate alternative qualified auditors even if there are plenty certificates issued by other CBs in the area (not possible to use other CB auditors due to non-compete clauses or need to train up in CB-specific systems)	As above “Very few certificates held by that CB” Disagree with “alternative options”	Conclusion after the first round of consultation is to keep the current “should” requirement for COC and CW audits.	Soil Association Woodmark Meriel Robson
4.3.9	T	This clause can be simplified and stricter written.	Please rewrite!	Agreed, the Clause was amended.	FSC Sweden

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					Lina Bergström/ Eva Mattsson
4.3.10	T	Why is it necessary to say this in the standard? If the auditor does not sufficiently follow the audit plan, e.g. finishes earlier, other rules of this standard apply. Each CH is different and the auditor needs certain flexibility.	Cancel or replace the “Shall” by “Should”	The Clause now indicates “should” instead of “shall”.	SGS Christian Kobel
Requirement 4.3.11	T	Root cause analysis of NC by CBs It is not helpful for CBs to determine the root cause of NC. It is an important task, but one that often requires careful analysis and debate, and best left to the organization audited.	Drop the need for Root cause analysis of NC by CBs	The reference to root cause has been removed.	Capital Natural Ana Dahlin
Page 41 Clause 4.3.11	T	Clause 4.3.11 “The certification body shall evaluate each nonconformity identified in the audit to determine the root causes and to conclude whether it constitutes a minor or major nonconformity.” – is grammatically incorrect and it is confusing the meaning of “root cause”. Root cause analysis is to be done by the auditee to find out why the problem has occurred.”	Do you mean: “The certification body shall determine the grading of each nonconformity according to its frequency of occurrence, scale and impact on the general objective or the requirement.”?	The reference to root cause has been removed.	BM Trada John Lovelock
4.3.11	T G E	If auditors and CBs will be required to detect/determine the root cause the audit time will increase to an uncontrolled amount. Also CB auditors will be forced in a corner that will be a clear threat to impartiality and breach fundamental audit techniques. The root cause can only be described and determined by the organization that is responsible for the non conformity. No other known certification scheme require the auditor to determine the root cause. It is always the individual certificate holder to do this. But all other certification schemes have certification requirements within their standards applicable for certificate holders. Integrate this requirement into the 40-004 and new FM Standards. It would be a huge benefit to the whole FSC System if certificate holder at least would need to	The certification body shall evaluate each non conformity identified in the audit to determine the root causes and to conclude whether it constitutes a minor or major nonconformity. Integrate this into the new version of the 40-004 Inspection and control 1.1 The organization shall conduct internal audits at least annually covering all requirements of this standard and establish corrective and preventive measures for non conformities detected. 1.2. A report on the internal audit shall be reviewed at least annually.	The reference to root cause has been removed.	GFA Matthias Rau

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		implement a internal audit program or non conformity control. All other certification schemes I know have a mandatory internal audit Program. Even PEFC requires an internal audits and non-conformity control.	1.3 The organisation's internal audit programme shall cover the subcontractor's activities and all sites. 1.4. The organization shall analyze the root cause of each non conformities detected by the internal audit program and certification body.		
4.3.11	E	Make two separate clauses on root cause and NCs	Divide 4.3.1 in two.	The reference to root cause has been removed.	FSC Sweden Lina Bergström/ Eva Mattsson
4.3.11	T	It does not seem appropriate for the auditor to determine the root causes of a certificate holder's nonconformity. First, the auditor is not very familiar with the entire system in place; second, if the auditor correctly figures out the root cause, this could be considered consulting; third, if the auditor does not figure out the correct root cause, the CH could find themselves trying to resolve a nonconformity by following the wrong path.	Remove "root causes". There could be a note added that explains that the auditor is encouraged to think about the root cause during evaluation of a nonconformity. This makes the point that root cause should be considered where possible but does not oblige the auditor to document the root cause they came up with.	The reference to root cause has been removed.	SCS Global Services Vanessa Ellis
4.3.12 a & b	T	"...failure to achieve the objective of the relevant requirement" – this statement could be applicable to any nonconformity. The fact that there is a nonconformity at all, even if it is minor, implies that the objective of the requirement has not been met. Therefore, if interpreted strictly, any nonconformity should be graded as major.	The phrase should be broader than just a single requirement: "failure to maintain the integrity of the COC system" for example.	Emphasis is made on "fundamental failure".	SCS Global Services Vanessa Ellis
4.3.12	T	Define what constitutes a fundamental failure.	Define what constitutes a fundamental failure.	Guidance on what can characterize a fundamental failure is included in 4.3.12b)	FSC Sweden Lina Bergström/ Eva Mattsson
4.3.12 Note 1	E	Note 1 should be its own sub-clause, rather than a note under the sub-clause about major nonconformities.	Change Note 1 to 4.3.12.c.	Note 1 is suggested to be deleted following discussions at the Working Group level.	SCS Global Services Vanessa Ellis

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
4.3.12 Note 2	E	Note 1 should be directly under 4.3.12, before a & b, rather than a note under the sub-clause about major nonconformities.	Move above 4.3.12.a.	The proposed Note was deleted.	SCS Global Services Vanessa Ellis
4.3.12b)		Support new note language that says that if several minor CARs are issued in a row for same root cause, it gets bumped to a major		The Note (which is currently a standard interpretation) is removed following discussion at the Working Group. The indicator "systematic" is much more important than "repeated". There are issues with nonconformities becoming automatically major when being repeated, which could in fact be of minor concern.	M-env Greenpeace Judy Rodrigues/ Catherine Grant
4.3.12b)		The identification of the root cause of a non-conformity during the audit process might be able in some cases, but will not be able in cases of non-conformities related to more complex reasons (e.g. a credit account showing wrong figures but it has to be clarified if the reason is due to wrong credit account management, wrong factors used for calculation, errors in the credit account template,...). In case a root cause shall be identified during the audit process, several hours could be necessary to clarify the root cause. This will not be covered by any costs, adequate audit time planning will not be possible and finally the requirement cannot be fulfilled.		The reference to root cause has been removed.	Auditor Jörn Ackermann Consulting Jörn Ackermann
4.3.12 b)	T	In b) it would also be needed to include that the NC has a certain importance. We have the example of certain issues in the group certificates as incomplete contracts with group members and the group management, lacking details in group documentation and others which will occur now and then in the groups and especially in groups with several thousands of members. Even if the group management works actively and consistently this non-conformities will be found and then as there are many changes in	Include that the minor need to have a certain importance and be related to a fundamental failure not only that 1+1 =2. Include if the NC is a result of intentional fraud or not. Make not 1 to mandatory for CBs.	The reference to "repeated" has been removed. The Clause should give sufficient indication on how to grade nonconformities.	FSC Sweden Lina Bergström/ Eva Mattsson

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		ownership and it takes time to get updated documentation of forestry activities. Another case happening several times is that members of groups and sometimes also departments of bigger companies is that the FSC registered trademark R is forgotten when used in documents like annual reports etc and two of these mistakes leads to a major NC Here it can also be included if it is intentional fraud or if it is more of a mistake. Also mistakes can of course lead to a major but intentional actions can be deemed harder. Note 1 would be better as a shall clause.			
Page 41, 4.3.12.b	T	root cause needs to be defined		The reference to root cause was eliminated.	FSC Germany Elmar Seizinger
Part 3, clause 4.3.12 b) NOTE 2, page 41	T	The meaning is not clear	Wording should be changed to make the meaning clear.	The Note was deleted.	NEPCon Tigran Martirosyan
Page 41 Move clauses NC		Yes agreed, it helps to clarify the requirements		Ok	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 41		This is also good and makes the system easier to overview!		Ok	FSC Sweden Lina Bergström/

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					Eva Mattsson
Page 41		Proposal to move clauses on handling nonconformities to FSC-STD-20-001 Agree		Ok	Tigran Martirosyan NEPCon
Page 41	T	Agree with proposal. Note currently in CW FM , issue of 1 Major = immediate suspension, so this would need to be amended in new 30-010	Check new version of 30-010	Ok	Soil Association Woodmark Meriel Robson
Page 41		Agreed		Ok	WWF International
Page 41		Agreed		Ok	Rainforest Alliance Alison Lesure, Laura Terrall
Page 41	G	Support the proposal	Support the proposal	Ok	FSC UK Rosie Teasdale
Page 41	T	Propuesta para cambiar las cláusulas sobre el manejo de no conformidades al FSC-STD-20-001 De acuerdo, menos documentos en el sistema. Plan estratégico. Ok, less documents in the system. Strategic Plan.		Ok	CMPC Augusto Robert
Page 41 4.3.12 & 4.3.14 In	T	During audits non-conformities may be found which root cause is not established by the end of the audit. Often this can only be done after the audit by relevant people within the audited organization. Generally the result of a non-compliance is detected – and seldom straight away the root cause of it.		The reference to root cause has been removed and also to “repeated”.	Consultant Andreas Knoell Consulting Andreas Knoell

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
combination with Page 54 Table 3 1.1.8		This means that auditors will sometimes not be in a position to prove that the same root cause is relevant in a repeated manner. What can be detected is that a standard requirement violation resulted in a repeated failure. But what exactly caused this, i.e. the root cause, may not be clear. Sometimes not even if the same indicator is concerned. In 1.1.8 the analysis of audit evidence is mentioned and I wonder in how far the analysis of the root cause might be mistaken for that.			
Page 41 4.3.12 b ii NOTE:		‘Repeated’ means that the same root cause ... This is usually indicated by a non conformity with the same indicator / requirement as in a previous audit. Over the years, there has been more and more emphasis on "bureaucratically" conforming to the wording of indicators, rather than allowing an auditor to evaluate whether the root causes of a non conformity to a criterion are major or minor. Indicators are just that – indicators. Often and especially now with the attempt to provide a single, world-wide set of generic indicators, the wording doesn't 100% apply to the forest management situation being audited. The sentence "this is usually indicated" will, overtime, take on a mandatory requirement. It should be possible for an auditor to issue a non conformity referenced to a specific indicator more than once within a five year period and be allowed to judge whether or not this is minor or major.	Define "root cause" in the glossary Delete the sentence "This is usually caused by a non conformity with the same indicator.... "	The Note has been deleted and the reference to root cause removed.	Consultant CJ Goulding
Page 41, 4.3.12, Note II	E	Use of "CAR" is out of place with this whole section.	Change to "nonconformity". Ditto for other clauses in this section.	The section has been checked for when to use nonconformity and when to use CAR.	Rainforest Alliance Alison Lesure, Laura Terrall

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
4.3.12		Concerns with this note: NOTE 2: As long as a CAR has not been confirmed in a formal decision making process, nonconformities can be re-graded as minor or major. Why explicitly write this. To me this is a motivating factor for CBs to then not formalise non-conformances giving them more flexibility to up or downgrade until they feel it is necessary to formalise the nonconformance		This Note has been removed.	M-env Greenpeace Judy Rodrigues/ Catherine Grant
4.3.13	T	Include SIR	Include SIR	This Clause is moved from the recently approved FSC-STD-20-011 and we aim to keep it unchanged.	FSC Sweden Lina Bergström/ Eva Mattsson
4.3.13	T	This clause is redundant and adds no value to the standard. Furthermore, it suffers from the same thing as the comment above for 4.3.12 a & b regarding “fundamental failure to achieve the objective of the relevant requirement”.	Remove	The clause was merged with 4.3.12.	SCS Global Services Vanessa Ellis
4.3.14	T	See comment above regarding 4.3.11 and “root cause”	Remove “including the root cause”	Ok, agreed.	SCS Global Services Vanessa Ellis
Evaluation; clause 4.3.14; p.42	G	It should not be the responsibility of the auditors to document the root cause of the nonconformance for the certificate holder or applicant. A key part of correcting the nonconformance is the process of conducting the root cause analysis internally (similar to the process CBs must go through in addressing nonconformances against accreditation standards). RA also cautions against using the term CAR. It is most important that the auditor identifies the nonconformance and applicable standard requirement. Using term CAR may apply a more		The reference to root cause was eliminated. Nonconformities are turned into CARs. The standard only makes general references and states that the CB shall check whether the CARs have been implemented.	Rainforest Alliance Alison Lesure, Laura Terrall

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		prescriptive description about how to address the nonconformance, which can have many different negative repercussions.			
4.3.14	T	It is important to reference to the standards indicator or criteria which is the base for the NC	Add the reference to indicator or requirement which is the base for the NC.	How to reference nonconformities is not specified in this standard.	FSC Sweden Lina Bergström/ Eva Mattsson
4.3.14		4.3.14 Nonconformities shall be transformed into CARs that at minimum include a description of the nonconformity (including the root cause) and a timeline within which the nonconformity shall be fully implemented by the client. Is this a typo? In which the nonconformity shall be fully addressed by the client. Fully implemented reads like they need to implement the nonconformity not close it out.		Yes, was amended (nonconformity shall be fully corrected).	M-env Greenpeace Judy Rodrigues/ Catherine Grant
4.3.14	T	It is not possible to include the root cause. In many cases the root cause can only be determined by the certificate holder itself, when taking corrective and preventive measures, after the audit. In addition the timelines for report finalization and possible elaboration of PS specified in the 20-011 and 20-007 are too short to allow additional action after the closing meeting, report writing, report review, peer review, client comments etc.)	Nonconformities shall be transformed into CARs that at minimum include a description of the nonconformity and a timeline within which the nonconformity shall be fully implemented by the client.	The reference to root cause was eliminated.	GFA Matthias Rau
Requirement 4.3.14	T	CARs including description of the root cause It is not the job of an auditor to identify the root cause. It is often impossible to do this by the time the report should be finished. Root cause analysis of NC is best left to the organization audited.	Drop the need for Root cause identification in a CAR	The reference to root cause was eliminated.	Capital Natural Ana Dahlin
Page 42 Clause 4.3.15	T	4.3.15 "CARs shall not be presented in a prescriptive way that could be perceived as providing consultancy." No, this approach is incorrect. It is the opposite - CARs must be prescriptive that is using the words from the Standard. Otherwise the	Please replace with: "CARs shall be prescriptive using the words from the applicable standard."	This Clause was deleted.	BM Trada John Lovelock

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		auditor uses his own words which could result in consultancy!			
4.3.15	T	This is more of guidance - take away or rewrite.	Take away or rewrite.	This Clause was deleted.	FSC Sweden Lina Bergström/ Eva Mattsson
4.3.16	T	The CB shall present findings and should if possible present proposed NCs, but it is not up to the auditor to decide on NCs! In the audit report which the CB has been decided upon shall include all NCs.	Change accordingly.	The Clause was revised following discussion with the Working Group and considering stakeholder comments. The auditor should present the NCs but the final wording and grading of the NCs is at latest done by CB with the submission of the audit report. There seems to be some variation in how CBs handle this.	FSC Sweden Lina Bergström/ Eva Mattsson
Requirement 4.3.16	T	Possibility of new NC after the closing meeting has been held The wording of this requirement is disturbing. There is no justification for new NC “popping up” after the closing meeting has been held. The audit is finished by then, and thus all opportunity for gathering evidence is over. Any “new” NC can only be derived from bad audit management by the audit team, and that cannot be then burdened on the organisation that is audited. NC wording can be improved, and classification of NC can even change, but there should be no new NC after a closing meeting.	Substitute by: “The certification body shall present all the nonconformities orally during the audit closing meeting and shall at latest inform the client of the final wording of nonconformities with the submission of the audit report.”	In the FSC context the final wording and grading of the NC can still be determined/ or changed after the closing meeting, e.g. considering the results of the FM peer review process.	Capital Natural Ana Dahlin
4.3.16	T	Submission of the report to whom? The CB, prior to review and decision-making? Or the CH, after a decision has been made? The answer affects the	Clarify	The final report is submitted after the certification decision	SCS Global Services

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		impact of Clause 4.5.6.		has been made.	Vanessa Ellis
4.3.16	T	La presentación de las No Conformidades al cierre de la auditoría era obligatoria en ISO, no se traspasó a este nuevo documento. No permite una explicación por parte del afectado en el caso de no tomar toda la información existente y solo se queda con una parte del problema. The presentation of the nonconformities at the close of the audit was mandatory in ISO, will not be transferred to this new document. Does not allow an explanation of the affected parties in case not all the information is taken into consideration and only keeps part of the problem.		In the FSC context the final wording and grading of the NC can still be determined/ or changed after the closing meeting, e.g. considering the results of the FM peer review process.	CMPC Augusto Robert
4.3.17 b) note	E	Merge b) and the note	Merge b) and the note	It is suggested to be kept separate, as it did not become clearer when merging the Clause and the Note.	FSC Sweden Lina Bergström/ Eva Mattsson
4.3.17 – 4.6.18 - 4.3.19 :	E	wrong numbering	4.3.18	Yes, corrected.	Tuev Nord Carsten Kahlert/ Martin Barnack
4.6.18	E	This is numbered incorrectly.	Should be 4.3.18.	Yes, corrected.	SCS Global Services Vanessa Ellis
4.6.18	E	Wrong number. This is one of the many places the License agreement is mentioned...		The numbering is corrected. This reference needs to be kept and is specific to this section.	FSC Sweden Lina Bergström/ Eva Mattsson
4.6.18	T	When is the nonconformity supposed to be issued? When is a CH determined to not have a valid license	Clarify the timeline so that it is specific, measurable, and auditable.	The requirement only indicates the timeline for correcting the	SCS Global

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		agreement? Currently, when SCS determines that a CH has an out-of-date license agreement, usually because of a company name change, we contact them and give them a month to update the agreement. Only then do we issue the major CAR.		major NC, which leads to suspension if not met. A NC is issued as per Clause 4.3.17.	Services Vanessa Ellis
4.3.20	T	This is not needed, if something is almost handled it might be better to make a minor of it.	Take away!	This requirement is procedurally important to be kept.	FSC Sweden Lina Bergström/ Eva Mattsson
4.3.21	T	Use the word decide instead of inform.	Change accordingly.	This clause is about informing the client about the need to conduct an on-site audit.	FSC Sweden Lina Bergström/ Eva Mattsson
-	T	The audit report and LOF have to separate what is NCs on group management level and what is NCs on group member	Add this1	This is specified in the scope specific accreditation standards.	FSC Sweden Lina Bergström/ Eva Mattsson
4.3.21	T	This should only be required for Major Nonconformities, as the follow-up of Minors should be possible at next surveillance, under all circumstances.	"The certification body shall inform the client if an on-site audit is required to verify that Major nonconformities have been corrected (NEW).	Following discussion with the Working Group it was concluded not to refer to major here. Minor CARs may require an additional on-site audit.	SGS Christian Kobel
4.3.22		This is just a comment/concern. Does FSC still not have a generic online template that CBs need to use to upload the public summary report information? This so needed to generate aggregate data, stats etc.		There is currently no online template for public summary reports, only two addenda to the FM evaluation standard on what needs to be covered content wise in the reports. Implementation of GA Motion 45 will address this issue.	M-env Greenpeace Judy Rodrigues/ Catherine Grant
4.3.22	G	Since it is not mentioned in FSC-20 011, we would like to stress this requirement: "A participant list shall be part of the audit reporting, where all interviewed people during the audit sign the participation by signature." A participant list is the only objective evidence for the		All reporting requirements are scope specific. It would be confusing to introduce a specific clause here.	Tuev Nord Carsten Kahlert/ Martin

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		reviewer that the auditor has performed the audit as an on-site audit and not as a desk audit. A lot transfer client told me, that the auditor has performed a desk audit but in the audit report was written, that the audit was performed as an onsite audit. This is a critical point for the integrity of the FSC-System.			Barnack
4.4.2:	G	We think this is a good requirement!		Ok	Tuev Nord Carsten Kahlert/ Martin Barnack
Requirement 4.4.2	T	It is not clear to me who writes the recommendation for a certification decision referred in this requirement. Is it the reviewer? Or the decision-maker? Or the lead auditor? If it is the decision-maker who writes the recommendation, who then makes the final decision? Confusing. What is the difference between this review and the certification decision?	Clarify	This has been clarified in the amended clause based on the ISO text. The recommendation can be written by the reviewer or the decision-maker, in case the review and the decision are done by the same person.	Capital Natural Ana Dahlin
Page 43	T	agree		Ok	Soil Association Woodmark Meriel Robson
Page 43	T	When will FSC-STD-20-007 be revised? Will there be a period when these clauses are not included in either standard?	When will FSC-STD-20-007 be revised? Will there be a period when these clauses are not included in either standard?	FSC-STD-20-007 is scheduled for review in 2015 and is planned to be revised in 2016. We will not be able to remove these Clauses now, due to the timelines for revision of FSC-STD-20-007. For now we will keep them in FSC-STD-20-001, to ensure that there is no gap.	FSC UK Rosie Teasdale
Page 43	G	Proposal to move peer review clauses to scope specific FM standard Agree. Specific clauses on forest management audits should be allocated in the evaluation standard of such certification.		See above.	IPEF / CMPC / Klabin SA/

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					Lwarcel Celulose Ltda/ Arauco Florestal Arapoti / TTG Brasil Investimentos Florestais Ltda
Page 43 Move peer review clauses	G/E/T	I could agree with that, but since 4.4.4 c d and e refer to the capacities of the peer reviewer I would like to keep them in this standard as well. H) taking the the comments in of the peer reviewer into account is weakly formulated. I would say the CB has to comply with the recommendations made by the peer reviewer of explain why the choose not to	4.4.4. c,d, e are renumbers as 4.4.4 4.4.5 and 4.4.6 4.4.4 h will be reformulated into the cb shall finalize the audit report in compliance with the recommendations made by the peer reviewer of in the report include what the recommendations were and why they choose not to follow up on them.	Since those clauses are specific to FM, they should be reviewed and revised during the revision process of FSC-STD-20-007, which is planned for next year.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 43	T	Wouldn't it be better to keep a condensed text here for peer review/evaluation of more difficult cases both of FM, CW and CoC and skip the rest.	Rewrite the text to fit to all kind of scopes and keep here.	Generic Clauses (for all scopes) were not agreed to be drafted. Since the Clauses are specific to FM, they should be reviewed and revised during the revision process of FSC-STD-20-007, which is planned for next year.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 43		Proposal to move peer review clauses to scope specific FM standard Agree		Ok	NEPCon Tigran Martirosyan
Page 43		Even though this deal with FM one could consider it to be a general requirement to CBs and should therefore be left in this standard, one could add text stating that CoC certification is exempt from peer review.		Exemptions always complicate requirements. Since the approach taken is specific to FM it was agreed to also move the Clauses to the FM evaluation standard, but since the revision of the FM evaluation standard will not be ready in time with the	WWF International

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
				revised FSC-STD-20-001, we will keep the Clauses for the time being.	
Page 43	T	Propuesta para cambiar las cláusulas de revisión de expertos al estándar de MF específico para el alcance De acuerdo Ok		Ok	CMPC Augusto Robert
4.5.1	T	Take away or are CBs so bad and confused so that this is needed.	Take away.	It is a re-iteration that certification decision making needs to stay under the authority of the CB.	FSC Sweden Lina Bergström/ Eva Mattsson
4.4.1 and 4.5.2	T	It is not clear why there is a difference between evaluation process and audit process. 1. Evaluation 2. Review 3. Certification decision	Adopt wording in 4.4.1 also to be in line with 17065 7.5.1 4.4.1 The certification body shall assign at least one (1) person to review all information and results related to the audit. The review shall be carried out by person(s) who have not been involved in the evaluation process (NEW).	ISO only refers to evaluation, does not differentiate between audit and evaluation. According to the definitions evaluation includes audit, review and decision making. Clause 4.5.2 was corrected to refer to “audit” process.	GFA Matthias Rau
4.5.2	T	Can the decision making entity be the same person as the reviewer, mentioned in Clauses 4.4.1 and 4.4.2? In reality, the person assigned to review the report is always going to be the one who makes the decision, even if they need to bring in more people on the reviewing committee. Therefore, it will not reflect reality to expect a separate person to actually make the decision. In order for them to sign their name, they would need to also review the report to ensure they agree with the recommendation of the reviewer.	Clarify that the decision maker and the reviewer can be the same person.	This was clarified in Clause 4.4.2.	SCS Global Services Vanessa Ellis
Part 4, clause 4.5.2	T	Decision making is not by people involved in evaluation process According to the clause, people who are involved in the evaluation process shall not make the certification decision. However, according to the draft standard	The “evaluation” should be replaced with “audit” in the clause, or in Terms and definitions part, definition of “Evaluation” should be updated.	Yes, corrected in the clause accordingly.	NEPCon Tigran Martirosyan

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		terminology, the decision is part of the evaluation. So people who are involved in decision making are involved in evaluation. The problem is caused by the different terminology in ISO 17065 and ISEAL. In ISO 17065 (and also in draft of FSC-STD-20-001), the evaluation is audit and application review, report review and decision are not in the scope of evaluation.			
4.5.3	T	b) Include that there is no conflict of interest Take away the note as it is already covered by the conflict of interest c) Not taken part in the evaluation process	Change accordingly.	b) amended as suggested. Working Group member preferred to keep the Note. c) Not taken part in the evaluation process is too broad, even audit team could be considered too broad (e.g. translator?), therefore necessary to provide specification.	FSC Sweden Lina Bergström/ Eva Mattsson
4.5.5	T	Isn't this covered elsewhere?		The Clause is deleted here as it was concluded not to allow separate entities under the organizational control to take certification decisions.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 45 4.5.6	G	- Proposal on validity timelines of main evaluation - Option for consultation I prefer the "alternative option as proposed above" (i.e. less time)		Considering the stakeholder feedback the Working Group agreed to a 12 months validity timeline of the main evaluation for FM evaluations, but also agreed that in justified exceptional cases the timeline can go up to 18 months maximum. In this case an on-site verification audit is required.	Capital Natural Ana Dahlin
Page 45		We prefer the "green box option"		The alternative approach is agreed for exceptional and justified cases up to 18 months after the main evaluation.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 45	G	It's important to consider the new proposal in extending the time for FMs, as in many times		The alternative approach is agreed for exceptional and	IPEF /

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		Organizations that have many units and considering that in one year a lot of information do not change, this extension can result in a more robust audit based on data with longer time as well as decrease costs.		justified cases up to 18 months after the main evaluation.	CMPC / Klabin SA/ Lwarcel Celulose Ltda/ Arauco Florestal Arapoti / TTG Brasil Investimentos Florestais Ltda
Page 45	T	RA is in agreement with the proposed validity timelines of the main evaluation for CoC, but do not agree with the proposed 12 month timeline for FM as there are situations where it will not be feasible for the client to close a major NC within 12 months. Requiring a new full main evaluation creates barriers for operations that face technical capacity issues (SMEs and communities) as they will unlikely be able to afford the cost of another full main evaluation. There also may be cases where conformance is dependent on a third party (e.g., approval of a management plan by a government agency) and is beyond the control of FME. The 12 month timeline would punish these operations and may dissuade them from apply or continuing with FSC.	In situations where a positive certification decision is not made within 12 months due to major NC, the time period for validity should be extended to 24 months. Between 12 and 24 months an onsite verification audit would be required prior to issuing a certificate to verify that main assessment findings are still valid and to evaluate any changes to management systems since the main assessment.	The alternative approach is agreed for exceptional and justified cases up to 18 months after the main evaluation.	Rainforest Alliance Alison Lesure, Laura Terrall
Page 45	G	4.5.6 – this assumes results are negative. If results positive, then eg. results would be available within 90 days and valid for longer than 6 months! Also some clarity required. If make negative decision in COC due to Major CARs after 3 months , client submits close out information after 7 months, would a new evaluation be required? I think this is the intent but not too clear. Time periods – suggest 6 months / 12 months validity for negative decision before new evaluation required –	Therefore need to prefix paragraph with “The following applies if results are negative” Need to clarify	Amended wording is proposed to provide clarification.	Soil Association Woodmark Meriel Robson

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		but needs to be clear whether this new evaluation covers the particular issue (eg. a Major CAR on HCV identification could easily take over a year to close out – to do surveys etc – but does new assessment require evaluation of this Major only or of the entire standard? – suggest follow up should be equivalent to Surveillance, ie assessing CARs and proportion of P&C)			
Page 45 Validity timelines	G	Agree with 4.5.6. against the complexity of forest certification stands the dynamics of the forest management themselves, contract expire collective agreements are terminated and the longer the time span the less regards this dynamics get.		Considering the stakeholder feedback the Working Group agreed to a 12 months validity timeline of the main evaluation for FM evaluations, but also agreed that in justified exceptional cases the timeline can go up to 18 months maximum. In this case an on-site verification audit is required.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 45		- Proposal on validity timelines of main evaluation - Option for consultation	4.5.6 - agree with the current proposal not the alternative suggestion	Considering the stakeholder feedback the Working Group agreed to a 12 months validity timeline of the main evaluation for FM evaluations, but also agreed that in justified exceptional cases the timeline can go up to 18 months maximum. In this case an on-site verification audit is required.	M-env Greenpeace Judy Rodrigues/ Catherine Grant
Page 45	T	- Propuesta sobre los tiempos de validez de la evaluación principal - Opción para consulta SE acepta la alternativa propuesta del 1,5 año. The alternative proposal of 1.5 years is acceptable.		The alternative approach is agreed for exceptional and justified cases up to 18 months after the main evaluation.	CMPC Augusto Robert
Page 45	T	- Proposal on validity timelines of main evaluation - Option for consultation Agree with suggested timelines in clause 4.5.6		Considering the stakeholder feedback the Working Group agreed to a 12 months validity timeline of the main evaluation	NEPCon Tigran

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
				for FM evaluations, but also agreed that in justified exceptional cases the timeline can go up to 18 months maximum. In this case an on-site verification audit is required.	Martirosyan
Page 45		The wording as proposed in 4.5.6 has preference		Considering the stakeholder feedback the Working Group agreed to a 12 months validity timeline of the main evaluation for FM evaluations, but also agreed that in justified exceptional cases the timeline can go up to 18 months maximum. In this case an on-site verification audit is required.	WWF International
Page 45 4.5.7	T	“CB shall have the right to delay or postpone its decision...” Is this at Main Evaluation only? Otherwise it runs against requirement to take a decision within 3 months of evaluation Also – see comment re Advice note above, possibly incorporate here?	Prefix with “At Main evaluation..”	Amended as suggested.	Soil Association Woodmark Meriel Robson
Surveillance	G	Presumably, sections 4.3, 4.4 and 4.5 (evaluation, audit review, and certification decision) are all applicable to surveillance audits as well. However that is not clear.	Clarify	Yes, surveillance audits are only a specific type of evaluation.	SCS Global Services Vanessa Ellis
4.6.2:	G	This looks like the CB doesn't have to issue a printed certificate to the client. We would prefer if the CB shall issue a certificate to every client and not only upon request. Otherwise a CB would be allowed to issue no certificate (for example by raising of the costs for a printed certificate, so that no one is willing to order a printed certificate). Many certified companies are asking for a copy of a printed certificate for verification that the supplier is really certified.		As issuing of certificates is also an ISO clause it has been re-introduced as a “shall” requirement. FSC considers the Database entry of the certificate information as the key source to verify the validity of the certification and therefore would like to make less emphasis on the issued certificate. Reference to the printed certificate was removed (as it	Tuev Nord Carsten Kahlert/ Martin Barnack

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
				could also be electronic).	
4.6.2	T	Delete the word printed, as most Certificates Holders do not want a printed certificate. They are totally happy with an electronic version.	A certificate shall only be issued after a positive formal certification decision has been taken by the designated certification decision making entity and upon request of the client.	Yes, agreed. This should be left for agreement between client and CB.	GFA Matthias Rau
4.6.2	T	Wouldn't it be time for handling electronic certificates? Why does the client need to ask for a certificate, it should be included in the CB service!		Yes, agreed. This should be left for agreement between client and CB.	FSC Sweden Lina Bergström/ Eva Mattsson
4.6.2	T	"and upon request of the client" – it should not be mandated by FSC whether CBs send paper certificates to their clients or not. This should be a business decision of the CB.	Remove "upon request"	Yes, agreed. This should be left for agreement between client and CB.	SCS Global Services Vanessa Ellis
4.6.3 Note 3	T	Which are the "applicable requirements"?	Clarify	Data for all applicable requirements needs to be entered (an "optional" field may be mandatory in certain cases) and all those marked as mandatory (maybe not only those specified in the standards, as the database has different purposes). What is mandatory and what not is specified at the database level.	SCS Global Services Vanessa Ellis
Page 46 4.6.3 NOTE 3	E	It is still not clear what "applicable requirements" are. There are many database fields which are not required to be registered by FSC standards therefore I assume are not applicable? Some of them are actually required fields in the database, not sure of rationale, and how this is decided between PSU and db teams	clarify	See above	Soil Association Woodmark Meriel Robson
4.6.3	T	It is not clear what the specified data is. Maybe it is the time now that FSC decides what the data is and what is not.	Develop a document with the specified data.	See above.	GFA Matthias Rau
Page 45 4.6.3	T	Amend "CB shall register a certificate... before it is issued..."	"CB shall register a certificate... when it is issued"	The Clause was amended.	Soil Association

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					Woodmark Meriel Robson
4.6.4.l & 4.6.6	T	Note under 4.6.6 is more appropriate under 4.6.4.l. However, is it still applicable, given that CBs can now manually enter site sub-codes?		The note was deleted, as this specification is not anymore up to date.	SCS Global Services Vanessa Ellis
4.6.4	T	It was clarified with PSU recently that all certificates must refer to the FSC trademark standard and this must be shown on the certificate. This needs to be added here.		This is covered in 4.6.5d)	SGS South Africa Gerrit Marais
4.6.4a):	G	The template of the FSC certificate is in most cases a higher-level document for all certification standards. It is not possible to make a special certificate only for FSC. So you should change the “shall” into a “should”. Or here should be written, that every new template of the certificate shall be approved by FSC International. What happened when the certificate template was approved by FSC?		This a requirement from the trademark side.	Tuev Nord Carsten Kahlert/ Martin Barnack
4.6.4c):	G	Most important concern Here it is written that also other “trade names and other addresses” can be used in the certificate. This will lead to confusion, so that I suggest the old wording. Otherwise it will happen that instead of a issuing a multi-site certificate, more than one legal form will be written on one certificate. This sentence is one of the biggest gaps in the FSC system for violations. In the last standard only one single legal entity with one address could be the certificate holder. In the next COC standard you want to track the products very closely by the OCP on the one side but on the other side you want to put many companies on the same	the legal name and registered address of the certificate holder	The wording of 4.6.4c) of Draft 1 is the same as the wording of the current standard. It is a must that the legal name and registered address of the certificate holder is indicated. Additionally where a trade name is used for sales invoices, also the trade name must be indicated. If a CH is using a trade name this needs to be registered in the database since otherwise the customer cannot verify that they are certified? In case this was not clear in the original wording the Clause was amended to clarify this.	Tuev Nord Carsten Kahlert/ Martin Barnack

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		single side certificate. Now it would be allowed to put the one legal entity in China on the same certificate of a legal entity in Europe. You have no information which site is producing and which site is trading. When a company has a different legal site, this is not a trade name, this is another certificate holder. The auditing of “trade names” in other countries is not covered by the FSC standard. A company will not be suspended if another “trade name company” is selling non conforming products that are covered by the same certificate. How will a CB suspend a “tradenname company” instead of the certificate holder? You would also have to change again the 40-003, because in this standard 1.1a) seems in contradiction with the 20 001 4.6.4c) draft. By 4.6.4c) the complete FSC system is weakened, so that PEFC is more rigorous compared to FSC. A CB is not able to track products, when on one single site certificate 100+ trade names in 10+ different countries are listed. By this requirement several standards contradict itself. So please keep the old version without “tradenames and other addresses”. Even today there is a problem that we see in the phenomenon in FSC data base entries for organizations “also trading as...”. The term “trade names” is much too ambiguous! And for large traders/brokers organizations, listing all proper trade names (in the sense of copyrighted trade names for products) is simply not feasible because they can have more than 1000.			

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4.6.4 c	T	c) the legal name and registered address of the certificate holder plus any trade names and other addresses that will be used for sales invoices; This still creates a loop whole in the FSC system and has never been fixed. This sentence is currently the valid version of the 20-001. Several Single certificates could be covers by just one certificate.	c) the legal name and registered address of the certificate holder	The legal name of the certified entity must be indicated. The trade name is only an additional reference where this name is used for sales invoices. It should not have an effect on the scope of certificates.	GFA Matthias Rau
4.6.4(d)	T	For CBs it is a real administrative burden to re-issue certificates every time a FSC standard is updated. Eg. when the trademark standard is updated, ALL certificates will have to be re-issued! PEFC have the following clause which could be considered/adapted? Note: The identification of the chain of custody standard shall refer to the version of the chain of custody standard against which the evaluation was carried out and which was valid at the time when the certification was granted. In order to avoid the necessity to issue a new certification document every time the chain of custody standard is amended, the identification of the chain of custody standard should include a statement “as amended” with the reference to the PEFC Council website (www.pefc.org) where the amendments to the valid version of the chain of custody standard are presented. Such a scenario might conflict with FSC-PRO-01-001 which makes certificates issued to an old standard invalid but I never agreed with this clause anyway	Reconsider need to re-issue certificates...	It was agreed that the standard version numbers do not need to be included in the certificate, but only in the database.	Soil Association Woodmark Meriel Robson
4.6.4 d	g	It is not clear if a CB has to issue new certificates if there is a change in version of the standards.		No, this has been amended. See above.	GFA Matthias Rau
4.6.4d):	G	What is when the exact product is not written in the 40-004a. We think it would be better to write the exact product in the certificate instead of a similar product according to 40-004 a. Also there is not written that the FSC Claims are written on the certificate. In our opinion the scope should summarize all activities	a description of the scope of the certificate, including a general description of the type of products covered by the certificate, a clear description of the input material used by the certificate holder, the main category for the input and also for the output and a reference to the specific	Certificate holders can choose the product classification level, it should therefore be possible to indicate the category 1 (at least). The certificate database is the only valid reference to check the customer status.	Tuev Nord Carsten Kahlert/ Martin Barnack

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		and all products of the company.	standard(s) (including the version numbers) that the certificate holder has been evaluated against, as defined by <i>FSC-STD-20-007</i> and <i>FSC-STD-20-011</i> accordingly		
Page 46 4.6.4d)	T	Should include guidance on the level to which this information is provided in terms of product type	Should include guidance on the level to which this information is provided in terms of product type	Certificate holders can choose the product classification level, it may therefore vary which level is chosen to refer to the product group.	FSC UK Rosie Teasdale
4.6.4.h	E	Certificates form Project certification cannot be verified on info.fsc.org.	It would be a great value to add the project certification on the search function of the FSC Database.	FSC has a separate page to search for projects: http://info.fsc.org/project.php	GFA Matthias Rau
4.6.4 l	T	Please specify the last part of 4.6.4 l. What “group certificates are meant here (40-003 or 30-005)? where XXX are the initials of the certification body agreed with ASI, ##### is a unique six digit number or combination of numbers and letters issued by the certification body itself, and ABC is a sub-certificate code issued only to the members of group certificates, in the form, A, B, C, AA, AB, etc.).		It refers to both FM and COC groups.	GFA Matthias Rau
Page 46 4.6.4 NOTE	G	References project certification although project certification is not specified as being within the scope of this standard	References project certification although project certification is not specified as being within the scope of this standard	Project certification is within the scope of this standard (and is referenced several times). There are no scope specific requirements for project certification under FSC-STD-20-011.	FSC UK Rosie Teasdale
4.6.4 note 1	T	Add Clause 14 of the 20-012 within the standard. Already indicators of the 20-011 have been moved into the 20-001 and other will be moved to the 20-007. Therefore it would be really helpful to integrate all requirements for Certificates into the new 20-001.	Add Indicator 14 of the 20-012 within the standard FSC Controlled Wood certificate requirements 14.1. FSC Controlled Wood certificates for forest management	It was agreed to add the details for CW FM to the draft standard.	GFA Matthias Rau

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
			enterprises shall be issued by an FSC-accredited Certification Body for evaluation of FSC Controlled Wood in forest management enterprises. 14.2. The certificate shall include: a) the FSC Controlled Wood registration code: CB-CW/FM-XXXXXX; b) type of certificate: single or group; c) reference to the standard FSC-STD-30-010 FSC Controlled Wood standard for forest management enterprises; d) validity of the certificate. 14.3. The FSC-accredited Certification Body shall not include the FSC logo in the FSC Controlled Wood certificate. 14.4 The “TM” symbol in superscript (e.g. FSC controlled woodTM) shall be used when referring to FSC Controlled Wood or Forest Stewardship Council Controlled Wood in the certificate template.		
4.6.6 Note	T	Please revise this wording, as this is not what is actually happening. Only the CB is issuing the sub codes to participating sites and not the Database.		The Database now automatically generates sub codes for COC group and multi-site certificates, but CBs can opt to enter manual codes for new ones upon first registration. The Note was deleted.	GFA Matthias Rau
4.6.6	E	This is unclear as central office is introduced, group members are missing.	Include all parts of a group and a multi site scheme in the text.	The wording was aligned with the terminology used in the revised multi-site standard, but it	FSC Sweden Lina Bergström/

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
				also applies to FM groups.	Eva Mattsson
Page 48		Support proposal for sub-codes for FM group members	Support proposal for sub-codes for FM group members	The database has been programmed to also offer the same solution to FM groups.	FSC UK Rosie Teasdale
Page 48	T	Información sobre la generación automática de subcódigos de COC de grupos/de multi-sitio De acuerdo Ok		Ok	CMPC Augusto Robert
Page 48	T	Cross-check with COC standards – think this is optional for existing certificates as caused a problem	Cross-check	The approach has changed since the draft was sent out for consultation. CB can enter a specific sub code when an organization is newly created, if no specific code is entered the db will assign one on its own.	Soil Association Woodmark Meriel Robson
Page 48	G	I don't understand why this has to be investigated if the technology exists for COC why don't apply it to FM?		The same approach is applicable to FM.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 48	T	Information on automatic sub-code generation for COC groups/ multi-sites If certificate subcodes will continue to be required for FM group members then the FSC database should auto generate the sub codes for FM certificates as well. Also, many CoC multisite certificates already have subcodes in place and have sophisticated material		The approach has changed since the draft was sent out for consultation. CB can enter a specific sub code when an organization is newly created, if no specific code is entered the db will assign one on its own.	Rainforest Alliance Alison Lesure, Laura Terrall

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		accounting systems which are expensive and time consuming to alter. Additionally, it is indicated that subcodes will be issued when the standard version is updated in the FSC database (info.fsc.org) which means the subcodes will not be available for the initial audit against the new multisite standard. This timing is very inconvenient. Comments such as these were submitted when the FSC gathered feedback about requiring subcodes on sales documentation.		The database has been programmed to also offer the same solution to FM groups.	
Page 48		A harmonization is good, but it is important, that the subcode is an alphanumeric code. It would be better if the subcode would be always numeric, because some CB are not able to have a subcode composed of letters in their own system.		The CB can now choose to have a numerical sub code, or one with letters or a combination.	Tuev Nord Carsten Kahlert/ Martin Barnack
Page 48		To include group members in a central database is likely to be difficult to handle. Our biggest group has 18 000 members . A wish from some of the Swedish groups is to have a national register on all members have left the groups so that other groups know if someone is jumping from group to group. That would possibly be of bigger need.		The approach has changed since the draft was sent out for consultation. CB can enter a specific sub code when an organization is newly created, if no specific code is entered the db will assign one on its own.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 48		Good, it seems to make sense to do the same for FM group certifications		Ok	WWF International
4.7.1 Note 1	E	"...CARs have to be considered..." – is "have to" implying a "shall" statement?	Change "have to" to "shall be" or "should be"	The key part of the Note was included directly in the Clause, but the part commented upon here has been deleted.	SCS Global Services Vanessa Ellis
4.7.1 Notes	E	Make the two notes to clauses.	Make the two notes to clauses.	The first note was included directly in the clause. The second note is kept, it is a reminder of the contractual right.	FSC Sweden Lina Bergström/ Eva Mattsson
4.7.1.h)	T	According to SGS Global Procedures for all certification schemes, we are defining an "annual due	"Annual" means that audits take place at least once per calendar year and	The approach is kept unchanged (the currently valid standard	SGS

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		date". This "annual due date", is the last day of the initial audit. The audit can be conducted annually 2 months prior or after the "due date". Such a system makes sense, because the audit is scheduled (independently from previous audit date) always in the same time frame. The clear disadvantage for the 15 month rules of FSC is, that in the case when the audit is always conducted after 15 months, the delay can be cumulated up to one full year. Furthermore the rule creates inequity because a CH conducted the initial audit at begin of the year is much more flexible than one who has been certified in December. From our point of view the FSC rule is imperfect and it would be a pity, if we would have to change our SGS System in contrast to all other systems, which are of course most accredited under ISO17021 or ISO17065. To our knowledge this rule has been defined only as standard interpretation so far and was never consulted.	additionally for chain of custody audits not later than fifteen (15) months after the last audit or for COC as system is implemented assuring the same time frame of 2 months prior or after the anniversary of the initial date. Timelines for implementing CARs have to be considered when scheduling an audit.	interpretation is included in the draft standard).	Christian Kobel
4.7.2	T	The stakeholder comment shall not be implemented. In addition please revise the wording. From a formal point there is a huge difference between short notice and short notice surveillances audit. The mixing of 17021 and 17065 requirements is not always appropriate as 17021 have a three year certification cycle.		Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged. The Clause has been moved to Clause 2.2.5, which lists the procedures that the CB is required to have.	GFA Matthias Rau
4.7.2	G	It would be helpful if FSC could specify the circumstances that would trigger short notice audits, but making short notice/ unannounced audits mandatory within the certificate cycle is not a good idea.		Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged. The Working Group identified the need to ensure that criteria and conditions for conducting short notice audits are harmonised (to eliminate differences in criteria and conditions), but this is something for the future and will not be	SCS Global Services Vanessa Ellis

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
				solved as part of this revision process. PSU was asked to collect information how this is handled at CB level within the next 3 years.	
Page 49	G	This motion was rejected at the GA so should not be in the standard.	Suggest that the “CBs may do unannounced or short notice audits to investigate complaints or in response to changes, or to follow up on suspended clients” as per 17021.	Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged.	Soil Association Woodmark Meriel Robson
Page 49	G	Against. Despite the ISO 17021 make such specifications, the proposal of Motion #31 was not accepted during the FSC GA, then the member's decision should be considered. Audits with short notice already exist, and happen when the CB receives any complaint about the organization. Besides the proposal be operationally and financially impossible, it does not solve the performance problem of CB and forest management as a whole. Determine fixed periods for such audits can create situations where it is not necessary for them to happen. Make an extra audit where there is no risk that non-conformity is occurring imply in unnecessary expenses for an organization.		Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged.	IPEF / CMPC / Klabin SA/ Lwarcel Celulose Ltda/ Arauco Florestal Arapoti / TTG Brasil Investimentos Florestais Ltda
Page 49		As the motion was rejected FSC should respect this. In the case of complaints, short notice can be used to investigate particular issues, but systematically incorporate short term notice audits does not seem the right answer.	FSC could at least develop some recommendation when unannounced audits would be recommended.	Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged. The Working Group identified the need to ensure that criteria and conditions for conducting short notice audits are harmonised (to eliminate differences in criteria and conditions), but this is something for the future and will not be solved as part of this revision process.	WWF International

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
				PSU was asked to collect information how this is handled at CB level within the next 3 years.	
Page 49	T	Proposal concerning unannounced/ short notice audits RA is not in favour of making a global requirement that all certificate scopes must have a random/short audit during a 5 year certification cycle. These audits should be risk based according to risk factors noted in 4.7.1, high risk geographies, and stakeholder concerns.	Alternatives: 1) ASI, with input from FSC and CBs, could be responsible for defining certificate scopes that require a short notice/random audit based on a predetermined risk assessment process; or 2) Require CBs to conduct unannounced audits on a min. of X% of their portfolio based on risk analysis.	Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged.	Rainforest Alliance Alison Lesure, Laura Terrall
Page 49 Clause 4.7.2	T	Short notice audits can be necessary in specific circumstances e.g. in response to a Complaint. However to require one per certification cycle is too prescriptive	Please remove the proposal regarding one unannounced/short notice audit per certification cycle	Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged.	BM Trada John Lovelock
Page 49		This is probably a good tool to add to the toolbox for CBs but to be used on a low scale and for certain occasions. Personal experience from organic certification is that senior auditors are extremely good to pick out cases where findings can be done at unannounced audits.		Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 49 4.7.2	T	Proposal concerning unannounced/ short notice audits Move to section on certification agreement so that all requirements for content of this are in one place	Move to section on certification agreement	The certification agreement already includes the right to carry out unannounced and short notice audits. The Clause was moved to 2.2.5, which lists the procedures that the CB is required to have.	Soil Association Woodmark Meriel Robson
Page 49		Proposal concerning unannounced/ short notice audits	4.7.2 – yes strongly support that FSC should provide further specification about short notice audits	Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged. The Working Group identified	M-env Greenpeace Judy Rodrigues/

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
				the need to ensure that criteria and conditions for conducting short notice audits are harmonised (to eliminate differences in criteria and conditions), but this is something for the future and will not be solved as part of this revision process. PSU was asked to collect information how this is handled at CB level within the next 3 years.	Catherine Grant
Page 49		In big companies, unannounced audits almost always must fail because key staff is not available on site or occupied with other things. Even in small companies, unannounced audits inevitably cause a rupture of the day-to-day procedures and will therefore create a lot of discontent with FSC in general. Large companies need an audit plan at least 3 month before the audit for the scheduling of all people involved in the audit. How will you do a meaningful unannounced audit, if no one is available during the assessment? And who will have to bear the extra costs of an unannounced audit which did not succeed because key staff was not on site, and a second audit is required a few weeks later? If no deliberate breach of FSC regulations can be observed? In 99% of the COC certificate holders, fraud is not a major concern. Unannounced audits are of course justified in cases where there is reasonable ground for suspecting fraud. We agree that the CB must have the option to carry out unannounced audits. But we strongly suggest that CBs should use this tool only in line with own risk-based criteria. These risk based criteria should not even be		Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged.	Tuev Nord Carsten Kahlert/ Martin Barnack

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		published (as in an FSC standard) because if you want to catch the few “black sheep” it is better if they cannot calculate their risk.			
Page 49	G	Unannounced or short notice audits can not be specified, if we do that the tendency will be that there is in cycle the middle will be unannounced or short notice and since we all calcite with the same calendar the CH will approximately now when to expect an unannounced or short notice audit. ASI should check if CB do this and if there is really not a patron in these audits since it's a requirements that we have them,		Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 49		Short notice audited should be used for complaint investigation		Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged.	NEPCon Tigran Martirosyan
Page 49	G	Proposal concerning unannounced/ short notice audits This type of audits are usually generally included in CB audit regulations, and used when necessary. I don't think further specification is necessary.		Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged.	Capital Natural Ana Dahlin
Page 49		We are sure that there is merit in unannounced or short notice audits for detecting non-conformities.		Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged.	FSC UK Rosie Teasdale
Page 49	T	Propuesta referente a auditorías sorpresa/de aviso en corto No estamos de acuerdo con visitas de vigilancia sean con aviso en corto, si sería posible de acuerdo a algún mecanismo de riesgo a evaluar. We do not agree with short notice surveillance visits, if it would be possible based on some mechanism to assess risk.	Que quede en mano de la EC, ellos tienen la realidad de la situación. It should remain at the discretion of the CB, since they have the best insight into the situation.	Considering overall stakeholder feedback the approach to unannounced and short notice audits is kept unchanged.	CMPC Augusto Robert

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
4.7.4	G	Thank you for specifying when exactly the certificate shall be suspended! Removing “immediately” and replacing with an auditable timeline is a great change.		The Working Group agreed to shorten the timeline from 10 days to 3 business days.	SCS Global Services Vanessa Ellis
4.7.4.	T	Good amendment, The auditor is not competent to suspend the CH himself. This must be reported and approved by the Certification Decision Maker and need thus a certain time frame. 10 day is okay.		The Working Group agreed to shorten the timeline from 10 days to 3 business days.	SGS Christian Kobel
Part 4, clause 4.7.4, page 49	T	Immediate suspension within 10 days after the formal presentation of CARs to the client The formal presentation of CARs may be different in different CBs, formal presentation may be done when the final audit report is sent to the client.		The Clause was reworded to state within 3 days after the certification decision was taken.	NEPCon Tigran Martirosyan
4.7.4		My colleague asked me if I knew the standard reference or where under FSC policies' is there a rule/guidance regarding what happens to suspended certificates after 1 year or when they don't close out their CARs in a timely fashion. "This Advice requires certification bodies to suspend and subsequently withdraw certificates when they cannot take certification decisions to maintain a certificate within a specified time period, beyond the control of the certification body." So what should happen to this certificate? How can a termination be invoked?		A new clause was introduced (4.7.5), indicating a maximum period that a certificate may remain suspended and specifying that the certification is withdrawn afterwards, unless major nonconformities have been corrected.	M-env Greenpeace Judy Rodrigues/ Catherine Grant
4.7.4 NOTE	E	proposal for clarity: “ extra audits to determine close-out of major nonconformities cannot substitute annual surveillance audits”	“ extra audits to determine close-out of major nonconformities cannot substitute annual surveillance audits”	The Note is deleted, the Clause provides specification directly.	Tuev Nord Carsten Kahlert/ Martin

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					Barnack
4.8.1	T	Requiring CBs to inform CHs when their own procedures change is too broad. CHs already suffer from information overload when it comes to FSC. If CBs have to also contact them every time our program manual, corporate procedures, or work instructions change, it will cause CH burnout and be overly burdensome to CBs. It's important to limit notices to only the most important so that CHs don't lose track.	Change to "its own procedures affecting certification requirements"	Agreed, amended as proposed.	SCS Global Services Vanessa Ellis
4.8.1	E	own procedures or requirements, only as far as clients are concerned	The certification body shall inform all clients of changes to FSC certification requirements or its own procedures or requirements, as far as clients are concerned , within thirty (30) days that such changes are approved by the approval body.	See above.	Tuev Nord Carsten Kahlert/ Martin Barnack
4.8.2	E	This clause is about content of the agreement between CB and CH. As such, it should be moved to Clause 1.2.2.2.	Move to Clause 1.2.2.2.	Yes, agreed. The Clause was moved to 1.2.3 (the renumbered 1.2.2.2)	SCS Global Services Vanessa Ellis
4.8.2	E	Move to certification contract/agreement	Move to certification contract/agreement	Yes, see above.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 49 4.8.3	E	"shall conform... in accordance with the standards effective date..." Actually there is always a transition period following the effective date as specified in FSC-PRO-01-001.		Yes, the clause was amended, referring to FSC-PRO-01-001 and reworded to apply to CBs.	Soil Association Woodmark Meriel Robson
4.8.3	T	It is always difficult to foresee how changes can affect the client, make a possibility for exemption in really difficult cases.	Make a possibility for exception in really difficult cases.	The Clause was amended to refer to FSC-PRO-01-001 which specifies transition rules.	FSC Sweden Lina Bergström/ Eva Mattsson
4.8.4	T	Good intention but unclear wording	Please make a clearer text.	This is a generic statement, but	FSC Sweden

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
				reference to other documents has been included, as e.g. scope specific accreditation requirements apply.	Lina Bergström/ Eva Mattsson
4.8.4 & 4.8.5	T	Does “appropriate action” allow for desk audits in circumstances beyond CH/CB control? There is currently an interpretation which allows this, but it does not seem to be incorporated in this draft.	Allow for desk reviews in these circumstances.	The interpretation is specific to COC evaluations / related to FSC-STD-20-011, so not included here, but is part of consideration of “appropriate action”(s).	SCS Global Services Vanessa Ellis
4.8.5	T	Add application reviewers.	Add application reviewers.	The scope of this Clause is not for applicants.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 51		Information on differentiation between auditor/ lead auditor and technical experts	Competency – one means of competency verification is the completion of an introductory FSC training course. Does this require an examination? I think to assure competency a test is needed.	Lead auditor was eliminated as term. Differentiation between auditor and technical expert should now be clear: definitions given in the glossary.	M-env Greenpeace Judy Rodrigues/ Catherine Grant
Annex 1	T	Please elaborate the Annex 1 in a way a normal standard is structured.		Annex 1 has been revised completely: replaced by three annexes.	GFA Matthias Rau
Annex 1	G	It is unclear how Annex 1 will be audited. If CBs are supposed to follow this at the level of “shall” statements, then it is a major doubling of oversight. ASI already conducts many witness assessments worldwide in order to assess the competency of CB auditors. Annex 1 removes a lot of flexibility currently available to CBs to develop their auditor pool but does not alleviate the financial and administrative burden of undergoing dozens of ASI assessments annually.		Annex 1 has been revised completely: replaced by three annexes.	SCS Global Services Vanessa Ellis

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Annex 1	T	Información sobre la diferencia entre auditor / auditor en jefe y expertos técnicos De acuerdo Ok		Ok	CMPC Augusto Robert
First paragraph	G	Is the first paragraph, with four bullet points, supposed to be normative? It seems like it is written in an informative style only. If the former, it should be numbered clauses. If the latter, it should be a Note.	More explanation and clarification is needed.	Annex 1 has been revised completely: replaced by three annexes that is clearer in its specifications	SCS Global Services Vanessa Ellis
Annex 1	G	Auditor, lead Auditor and Audit team leader are mixed in the whole draft of the standard making it impossible to comment on each section where auditor, lead auditor or team leader is mentioned. i.e. 2.4.1 b, 3.1.4.1 a i, 1.4.11, 1.7.2 c ii, 3.1.4.1 a ii, 3.1.4.1 b, 3.1.4.2 d , From my point of view it is not necessary to make a distinction between auditor and lead auditor. A Lead auditor is simply the team leader. Lead auditor is just a function title.		Annex 1 has been revised completely: replaced by three annexes that is clearer in its specifications and inconsistencies are removed. Distinction of auditor and lead auditor has been removed.	GFA Matthias Rau
Annex 1	T	Tertiary education not only university degree. Do not create a misunderstanding here, please.		Wording has been revised.	GFA Matthias Rau
Annex 1	T	In general the draft is hard to understand.		Annex 1 has been revised completely: replaced by three annexes that is clearer in its specifications.	GFA Matthias Rau
Annex 1	T	I think this whole section is unclear and needs to be re-structured. It is also repetitive in places which adds to the confusion	Consider restructuring so clear what total requirements are necessary for each level of Auditor/Lead Auditor etc – see below	See above	Soil Association Woodmark Meriel Robson
Page 51/52 Annex 1	T	Auditors & Lead auditors Overview of required initial qualification and competencies	Leave CW competencies separate, so they can be easily adapted to both: FM or COC audits.	Overview has been revised to make it clearer – also regarding CW.	BM Trada

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		FM standard knowledge is not needed for CW evaluation, despite being lobbied as such by FM-accredited CBs. It is more reasonable to say that CW standard knowledge and forestry background is needed for CW evaluations. Please be sensible and do not ignore the logic.			John Lovelock
Annex 1	T	The system is too detailed and elaborate. Make it more general and define the key issues to have good audits. We get the impression that this will favour the bigger international CBs to the smaller local CBs. Is that the intention? Will that bring quality to FSC certification?		Annex 1 has been revised completely: replaced by three annexes that is clearer in its specifications.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 51		OK but an auditor and lead auditor can also have special expertise.		Concept of auditor and lead auditor has been eliminated. In the glossary a definition is added to make clear the difference between technical expert and auditor.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 51	E	I would complete the list by stating what the requirements are for technical experts, what additional expertise the auditor needs to have and then add the extra qualification the a lead auditors have. If you see it as an hierarchy present it like that.	Add information on technical expert, not about what the don't need to have, but on what they do need to have.	Ok, comment will be take in consideration.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 51		We agree to the stakeholder comment regarding the increasing of the trainee audits from 3 to 4.		Ok	Tuev Nord Carsten Kahlert/ Martin Barnack
Page 51	E	Says a person who is competent in eg. HCV , Social issues etc. could be a technical expert. So could a	Make clear that Technical Experts can audit sections of the standard, or	With the wording applied in the STD a person is only called an	Soil Association

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		technical expert audit eg. P9 or P3/4, feeding into the Lead Auditor report/decisions? This is very important as if an Auditor rather than Tech Expert is required for this then the burden on qualification of audit teams is too high. (see more below). To give some context to this , we as a CB operate worldwide for FM. Not including Lead Auditors, we have c. 80 Auditors – ie. people who could be part of the team and audit sections of the standard under the supervision of a Lead Auditor. Just to get them ISO trained would therefore cost a minimum 100000 euros (course costs +travel+accom) which is not feasible. To potentially organise their witness audits and qualification audits on top of this is another burden of hundreds of thousands of euros. This would make FSC FM certification very difficult to introduce in the developing world or in countries where it does not already exist – how to find 4 audits for Auditors to participate in before they become an Auditor?	reduce requirements for qualification of Auditors (see below)	auditor if s/he audits against FSC schemes. Technical experts are no auditors and are not allowed to audit. Concrete and unambiguous definitions/wording about this differentiation are in the glossary and the annex about the audit teams.	Woodmark Meriel Robson
Additional Lead Auditor requirements	T	Information on differentiation between auditor/ lead auditor and technical experts Needs to be really clear for consultation that what FSC are now asking for is that require a total of 7 audits under the supervision of a Lead Auditor before can qualify as a Lead Auditor. It is (a) not clear as requirements are in two places, and (b) too much of a burden – it will be incredibly difficult for CBs to finance / organise 7 shadow audits for each lead auditor before they become qualified, particularly in areas where few certificates by that CB but also just generally	Clarify, and reconsider need for 7 audits	Differentiation between auditor and lead auditor eliminated. For the differentiation between technical expert and auditor the wording was revised especially in the glossary and the annex about the audit team.	Soil Association Woodmark Meriel Robson
Page 51	T	Information on differentiation between auditor/ lead auditor and technical experts The requirement for auditors are strict. They are not responsible for the leading the audit process and taking the decision on CARs, so they shouldn't be required to certified against ISO. The number of audits for auditors is big. It is 3 audits	The ISO certification requirement for auditors should be deleted and moved to lead auditor qualification in Annex 1, section 1 "additional requirements for lead auditors". Number of audits for auditor in training	Differentiation between auditor and lead auditor eliminated. For the differentiation between technical expert and auditor the wording was revised especially in the glossary and the annex about the audit team.	NEPCon Tigran Martirosyan

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		as auditor in training + 1 where an auditor acts as auditor (level of efforts counts) Considering that for lead auditors qualification, 3 more audits are required to be conducted as auditor, then participation in 7 audits in total are required for lead auditor qualification. It is very costly for CBs.	to obtain the auditor qualification should be reduced to one audit. If the auditor in training shows the satisfactory performance than a person should be approved as auditor.	This should now hopefully clarify which requirement applies to which function.	
Page 51/52		There has to be a way for persons who have gained their knowledge and experience without too much of formal education. There are other ways to become a good auditor. With these requirements for auditors we exclude people which can be excellent auditors. The proposed text covers auditors, the topic mentioned in the box to the left says evaluations which can be interpreted as the whole evaluation of a client. This would be a better way of looking into all personnel and committee members being involved in evaluation and certification		The qualification requirements have been revised but the formal education aspect has to remain.	FSC Sweden Lina Bergström/ Eva Mattsson
Page 51/52	T	If doing 40-005 Annex 2 or 3 audits, then necessary for CW auditor to be FM qualified. If Company simply buying already CW wood then could be COC qualified only	Distinction needed	CW issue has been amended in the qualification requirements part to be clearer.	Soil Association Woodmark Meriel Robson
Page 51/52		Agree although I don't agree with scenario 2 as it formulated The wood mixed is sourced as FSC controlled wood (which means it already has been evaluated against CW requirements) THEREFORE material is no longer covered by the scope of CW standards. It's still is covered, but the expectation is that it meets the requirements so otherwise it couldn't have been sourced as CW. Whether FSC's credibility is served with an auditor that is only competence is FSC std 40-004 I dare to question.		The wording for the CW issue has been discussed internally again and the wording was revised accordingly.	FNV Bouw Coen van der Veer / BAT-kartellet Camilla Vakgaard
Page 51/52		RA supports FM qualifications for CW auditors when evaluation requires field verification at the forest level and/or the evaluation of interim risk assessments.		Ok	Rainforest Alliance Alison Lesure,

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
					Laura Terrall
Page 51/52	T	Información sobre necesidades de calificación de MF para evaluaciones de MC De acuerdo sea integrado Ok to be integrated		Ok	CMPC Augusto Robert
Page 51/52		Agreed with the revised list, even though it seems overcomplicating matters slightly.		Ok	WWF International
Tables 1 and 2	G	What are these tables? What are CBs supposed to do with them? Are they informative, explaining Annex 1? Or are they normative?	More explanation and clarification is needed.	Tables and annex has been revised to be clearer.	SCS Global Services Vanessa Ellis
Page 52/57 Point 1, education, second option (means of verification of initial qualification on page 57)	T	[My attempt at referencing the relevant clause here provides a case in point of the comment above] “Secondary education with specialization...” – not all secondary education provides the opportunity to specialize – especially in something as specific as forestry. Additionally, even if the auditor does have relevant secondary education experience, if they have been in the workplace for 10 years, it is all irrelevant at this point. In other words, it seems more important that they have work experience for 10+ years than what they studied in high school.	Remove “...with specialization in forestry...” in the second option.	Comment was considered and wording was revised accordingly.	SCS Global Services Vanessa Ellis
- Proposal for COC qualification - Proposal for number of	G	While SCS agrees that one of the training audits should be the trainee leading while being witnessed, we disagree with increasing the number of training audits from 3 to 4. Our Auditor Performance Specialist has had 7 years’ experience working for two CBs in a training capacity, and that experience has never proven there is risk with only 3 training audits.		Number of required audits as part of auditor qualification process has been discussed again, but the increase to 4 audits was considered as being ok/helpful.	SCS Global Services Vanessa Ellis

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
audits to qualify as auditor					
Page 52/53		The requirement about CoC qualification The number of audits to qualify as auditor is big. It should be reduced to one	See comment about number of audits for qualifying as auditor. Should be reduced to one successful audit (for trainer discretion)	Number of required audits as part of auditor qualification process has been discussed again, but the increase to 4 audits was considered as being ok/helpful.	Tigran Martirosyan NEPCon
Page 52/53		See above.			FSC Sweden Lina Bergström/ Eva Mattsson
Page 52/53		We agree to the stakeholder comment regarding the increasing of the trainee audits from 3 to 4.		Ok	Tuev Nord Carsten Kahlert/ Martin Barnack
Page 52/53		Proposal 1) is preferred		Ok	FSC Germany Elmar Seizinger
Page 52/53		Agreed with the proposal under 1. The # of audits can be further augmented to 5. Given the complexities of certain supply chains it requires quite some experience to be able to act as lead auditor.		Ok	WWF International
Page 52/53	T	Information on FM qualification needs for CW evaluations 1) Secondary education and 1 year experience or 4 audits 2) 4 is ok – but for LEAD Auditor	1) give both options as left 2) 4 is ok. Same should apply to FM Lead auditors	Ok	Soil Association Woodmark Meriel Robson
		Information on FM qualification needs for CW evaluations	1.2.7 - qualifications related to FSC-STD-40-005 until 2017 where no NRA exists need to be considered as they will need to have forest management expertise to adequately check	CW issue and qualification needed for that was re-discussed internally after a number of comments during the public consultation. The wording of the proposed STD revision	M-env Greenpeace Judy Rodrigues/

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
			compliance with for example 40-005 indicators 7.3 Where no 'mandatory' Control Measure is provided and/or no valid NRA exists, The Organization shall establish and implement effective Control Measures to mitigate 'specified risk'. 8.1.2 The Organization has conducted an Interim Risk Assessment according to Clause 8.2 and has implemented requirements of this standard according to the concluded risk designation. This option shall not be applied after 31 December 2017.	was adapted accordingly.	Catherine Grant
Page 52/53		Auditor should not only have a secondary education but have gained appropriate qualifications as a result.	Auditor should not only have a secondary education but have gained appropriate qualifications as a result.	Qualification requirements have been reworded to be more specific.	FSC UK Rosie Teasdale
Annex 1, 1. Point 1	T	Work experience in the industry sector is more important than professional experience as an auditor. The qualification as auditor will be achieved by training and witnessing. It will be very difficult the acquire persons, who have already audit experience.		The work experience that is mentioned here refers to the industry sector not the work experience as auditor	SGS Christian Kobel
Page 52/53		- Proposal for COC qualification - Proposal for number of audits to qualify as auditor	The requirement of 1 year working experience in a related field for a COC auditor applicant might be sufficient for the implementation of comparatively easy audits (e.g. small printing houses), but not for the implementation of highly complex audits, e.g. at	Yes, but it will be difficult to differentiate between different levels of complexity/difficulty in COC and specify the amount of work experience for each one of these	Auditor Jörn Ackermann Consulting Jörn

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
			industry level. Additionally the "soft skills" which are key issue in many audits might not be developed after 1 year of professional working experience.		Ackermann
Page 52/53	G	- Proposal for COC qualification. - Proposal for number of audits to qualify as auditor Item 1: the experience in 4 supervised audits is more relevant than 1 year of full time work experience due to more specific qualification requirements. Item 2: increase the number of audits may be relevant when is proportional to the experience of this professional, being an important requirement for both FM and COC certification.		Ok, comment was taken in consideration	IPEF / CMPC / Klabin SA/ Lwarcel Celulose Ltda/ Arauco Florestal Arapoti / TTG Brasil Investimentos Florestais Ltda
Page 52/53	G	Regarding proposal #2 for # of audit requirements for FM and CoC auditors, RA does not agree with the increase from 3 to 4 audits to be qualified as an auditor. There is no magic number of audits that should go here; and the number required will depend on the aptitude of the trainee. It would be better to focus on the content and execution of the training program, setting requirements for CBs to evaluate the performance of trainees and only "pass" a trainee once they have demonstrated competence. Furthermore, RA does not agree that the trainee needs to lead an audit that is under the supervision of the lead audit. This requirement should apply for <u>lead</u> auditor qualification not for auditor qualification.	Requirements should be maintained at 3 training audits, with one of them being a successful completion of a witness audit. Lead auditors shall be witnessed at least once acting in the role of "Lead Auditor". Auditors are not qualified to lead audits, they only act as members of an audit team; therefore the witness audit to qualify as "Auditor" does not need to be one where the trainee is acting as lead auditor.	Number of required audits was re-considered but kept at 4 When talking about auditors in this STD, FM or COC auditors are meant – not technical experts.	Rainforest Alliance Alison Lesure, Laura Terrall
Page 52/53		Agree with 1 and 2 but I don't agree that a trainee can have full responsibility not even under the supervision of a lead auditor. If a trainee is to have full		Issue was discussed further, but it was considered important that a trainee takes at least once during his/her training the	FNV Bouw Coen van der

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		responsibility he/she should receive the full pay and that is mostly not the case, so during a traineeship all responsibility fall to the lead-auditor. What doesn't mean that a traineeship should include the full scope		responsibility as active member in the audit team – while the supervision by a (qualified) auditor must be assured.	Veer / BAT-kartellet Camilla Vakgaard
Page 52/53		De acuerdo con la propuesta de Calificaciones de COC. No de acuerdo con la del número de auditorías, es un tiempo muy amplio para poder ser declarado como Auditor, solo se debe aumentar si se requiere que sea Auditor Jefe. Ok with the proposal for COC qualifications. Not agreeing with the number of audits, too much time is needed to become auditor, should only be increased if it is required to be Lead Auditor.		Number of required audits was re-considered but kept at 4	CMPC Augusto Robert
Page 53, Annex 1, 3.2.	T	FM-auditors do not only have to know the national FSC-standards but also interpretations for theses standards	Knowledge of the specific FSC standards This section refers to knowledge needed to audit according to a specific FSC scope. It is required to know all scope specific normative documents, related non-normative documents as well as other relevant information such as interpretations for the national FM Standard	Comment was considered in the revision of the annex (now three annexes).	FSC Germany Elmar Seizinger
Annex 1, 2. (COC Szenarios)	T	An FM Auditor should only be required to be included in the team, when FMU audit must be conducted, but not necessarily for the review of risk assessment. The risk assessment is may be not too complex e.g. when the RA is in line with www.globalforestregistry.org . or with National Risk Assessment and only low risk is assessed.		The COC issue was re-discussed internally (again) and the wording of the STD text was amended accordingly.	SGS Christian Kobel
Annex 1,2 table 2	T	Requirements Point 5 in the table 2 (witness audits) seems to be in conflict with the Annex 1, 1. Point 2.		This should now be eliminated due to amending the whole	SGS

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
				annex.	Christian Kobel
Page 54/55 - Number of audits per year	G	Three audits is not equivalent to 3 audit days. Is this deliberate? There should not be a minimum number of audits/days conducted per year for those personnel who are required to be qualified as a lead auditor but are not actually auditors in practice (e.g. certification decision makers). Technical staff who are also auditors, are working with the standards, reports, auditors, etc. every day, immersed in the FSC scheme. There is no need for these individuals to conduct 3 audits/year to maintain their competencies. On the other hand, 3 audits/year is a very low number for auditors to be able to maintain their competencies.	Rephrase to be audit days, which is a more consistent measure. A provision should be provided to allow for exceptions based on performance evaluations, such as professional time spent on technical matters. If the number of audits per year is aimed solely at helping lead auditors maintain their competencies, the number should be higher.	Comment was considered and wording was revised.	SCS Global Services Vanessa Ellis
3	T	4 Personal attributes are extremely important to get a well functioning audits with good evaluation of the system		Ok	FSC Sweden Lina Bergström/ Eva Mattsson
Table 3 COC	E	We prefer a changing of the sentence as follows: 3. Participation in at least four (4) complete third party FSC COC audits as an observer or as an auditor , in the last three (3) years ...	3. Participation in at least four (4) complete third party FSC COC audits as an observer or as an auditor , in the last three (3) years ...	Comment was considered and issue was re-discussed. The wording was slightly revised to be clearer.	Tuev Nord Carsten Kahlert/ Martin Barnack
Table3	E	There is sometimes written "Witness audit ... and supervision witness report written by the witness auditor" The definition of witness auditor is missing in terms and definitions. I also prefer the phrase monitoring audit, because a witness audit is done by ASI, a monitoring audit is done by the CB.	"Witness auditor: An employed auditor of the accredited certification body who is performing the witness audits. The witness auditor has to be at least a lead auditor in the scope, the witness auditor is evaluating the auditor (applicant). Witness audits shall not be performed by subcontractors."	Comment was considered but this wording/terminology is not relevant within this STD/does not apply in the same way.	Tuev Nord Carsten Kahlert/ Martin Barnack

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
			Better: “Monitoring auditor: An employed auditor of the accredited certification body who is performing the monitoring audits. The monitoring auditor has to be at least a lead auditor in the scope, the monitoring auditor is evaluating the auditor (applicant). Monitoring audits shall not be performed by subcontractors.		
Page 54	T	Table 3 Column 3, 1.1 a) Proposal to have all Auditors (not just Lead Auditors) be ISO qualified b) Proposal to have participation in same 4 audits as per 2.1 Point 1: 3 audits/audit days every year is ok for FM since audits typically 1 week long, however for COC if we as CB only have one or two certificates then it will be impossible to achieve. Point 2: “At least 3 audits/days every year” – could be impossible also for CW auditors where there are few CW audits in region	Reconsider	Qualification requirements have been revised to consider this aspect.	Soil Association Woodmark Meriel Robson
Page 54	T	Table 3 , section 1.1, right hand column point 1. Also Table 3, section 2.1, right hand column , point 2 I think <u>Lead Auditors</u> only should be witnessed every 3 years. Requiring all Auditors to be witnessed is a very significant burden. Also due to structure of Annex, not sure whether this will be clear that this is what is being suggested	Apply to Lead Auditors only. Make very clear in next version in order to get other stakeholder comments	Term of lead auditor has been eliminated. Term of “auditor” within this STD text is only applied for auditors who audit against FM and COC. Technical experts are not referred to as auditors. Glossary is supposed to make clear the differentiation.	Soil Association Woodmark Meriel Robson
Page 55	T	Table 3, section 2.1, right hand column , point 2. Participation in 4 FSC FM audits over 3 years under supervision of lead auditor – is this really required for Auditors? Depends on definition of Auditor – whether	Confirm that a Technical Specialist could audit part of a standard, under the guidance of a Lead Auditor	Technical experts are not supposed to audit and always have to be under the guidance of an auditor (check revised	Soil Association Woodmark

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		this is anyone who audits part of a standard or whether a Technical Specialist could audit part of a standard		annex about audit team composition).	Meriel Robson
Page 55	T	Table 3, section 2.1 & 2.2 , 3 rd column, point 2. Agree that CBs will need at least 1 year transition time to make some of significant changes in standard (eg Auditor training, comments below). This needs to be clarified in the standard	Clarify either by making effective date 1 Jan 2017 or by adding Transition date	Yes, transition time is needed, however, I believe it is rather clear that 1.1.2017 applies to this section as well – as it applies to the whole revised STD and as it is state in the beginning of the revised version	Soil Association Woodmark Meriel Robson
Page 55, 2.1	T	Auditors knowledge on national FM-standards Training especially on the national FM-standards is needed to harmonize the auditors work on national level. Means of verification of competence to ensure initial qualification for FM-auditors	One more bullet point in the second column - participation in one national FM-standard training if offered through NO	Aspect of knowledge about national standard was considered when amending the draft version.	FSC Germany Elmar Seizinger
Page 55/56 -Means of verification of initial qualification 1 - competence criterion 3	T	COC CW audits are very complicated. Although we include a basic intro to what CW is, we don't provide full training to the nuances and complexities of the CW standard until the auditor is more experienced. In other words, our basic training course is not designed to prepare auditors for CW audits because we don't assign them CW audits until they are ready. Additionally, competence criterion 3 lists all FSC COC documents and expects the auditors to be familiar with all of them. However, not all auditors need to be familiar with all standards. At SCS, we have a Senior Lead Auditor designation and separate training course for complex audits including CW, reclaimed material, credit system, and large multi-sites and groups; we also donot train auditors on 40-006 unless they are going to audit a project.	Allow for flexibility in how CBs set up their training courses. CBs should be able to determine what level of complexity a new trainee is exposed to.	Comment was considered, while there is a need to define at least a minimum how auditor trainees are supposed to be trained for CW. CBs are of course free to do more if they want.	SCS Global Services Vanessa Ellis
Page 55/56 -means of verification of initial	E	The criteria go from 1 to 3 and skip 2	Renumber	Annex has been revised	SCS Global Services Vanessa Ellis

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
qualification					
Page 55/56 -means of verification of maintenance of qualification	E	The criteria start at 4	Renumber	Annex has been revised	SCS Global Services Vanessa Ellis
- "participation" in an audit	T	What is "participation"? Of the 4 training audits, only the expected level of participation is specified for the last (witness) audit.	Provide a definition or clarification of "participation" in an audit.	Specifications were made to be clearer about this	SCS Global Services Vanessa Ellis
Page 56 competence criterion 4	T	"Interpreting the requirements" – Auditors should not be encouraged or expected to interpret requirements. This is up to the CB, FSC, and/or ASI. Instead, auditors should be expected to apply requirements and related interpretations. Additionally, it is unclear what auditors are expected to do when "analysing the adequacy of the audit programme".	Remove "Interpreting the requirements" Clarify/ reword "analysing the adequacy..."	Annex has been revised completely	SCS Global Services Vanessa Ellis
Page 56/57	E	-3.1 means of verification of maintenance of qualification -3.2 means of verification of maintenance of qualification: All the criteria listed are the same as in Section 1.1.	It would be clearer to simply reference 1.1.		SCS Global Services Vanessa Ellis
-COC terminology, principles, and practices	G	The competence criteria seem very limiting. How detailed is this knowledge supposed to be? Additionally, some of the criteria seem very specific to each individual CH (ex. #4). It is not clear how knowing business administration aspects or the requirements of timber regulations add value to being a good auditor. The CH has the burden to explain things like their	Add flexibility and reduce knowledge burden of auditors	Annex 1 has been revised completely (also considering this comment).	SCS Global Services Vanessa Ellis

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
		business in relation to product flow, and basic knowledge of timber regulations has thus far proved sufficient. SCS has 130 contract auditors worldwide who are very competent at auditing a variety of organizations. Putting these sorts of limitations in place could potentially reduce the types of audits they conduct. This would have an adverse effect on quality of audits. For example, we would need to recruit more auditors for specific types of audits; this means they would each get less individual attention from our technical staff; if they also only need to conduct 3 audits per year, this means they might not, in practice, have enough experience to conduct a comprehensive and accurate audit, even though they are knowledgeable of the specific industry.			
Page 57 -COC terminology, principles, and practices	G	The current competence criteria for terminology, principles, and practices related to COC audits need to be clarified. It is unclear how finely FSC is expecting CBs to define “business sector”. For example, are printers considered separate sector from pulp mills? If so, although the current language allows for on-the-job training, in practice it is very expensive, and thus not practical, to have auditors carry out 8 supervised audits before they are considered knowledgeable enough to audit printers vs. sawmills vs. cabinet makers, etc. That is potentially either a huge number of supervised audits per auditor, or an unmanageable number of very specialized auditors.	Add flexibility and reduce knowledge burden of auditors	See above	SCS Global Services Vanessa Ellis
Page 58 -4.1 Means of verification of initial qualification 1	T/E	Criterion 1 references Section 2 (Knowledge of specific FSC standards). However, it seems that the criteria listed for Section 1 (Audit principles, procedures, and techniques) prepare auditors much better for displaying correct personal attributes.	Change reference to Section 1	See above	SCS Global Services Vanessa Ellis

Reference	Type of comment	Comment	Proposed change	PSU observation	Contributor
Annex 2 1.2.5	E	This sub-clause states, "...in addition to the requirements specified in Annex 2, 1.2"; however, this sub-clause is part of Clause 1.2	Clarify which requirements this is referring to.	Annex has been revised.	SCS Global Services Vanessa Ellis
Annex 2, clause 1.2.3 c), page 60	E	"a team member" the beginning of the point is redundant as it is already in 1.2.3. clause	"a team member" should be deleted	Aspect of knowledge about national standard was considered when amending the draft version.	NEPCon Tigran Martirosyan