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1 Introduction

ETKO certification program is developed to certify products produced according to Forest Stewardship Council (FSC) standards for timber, non-timber products, and ecosystem services which ETKO has been approved by the Forest Stewardship Council (FSC).

Forest Stewardship Council (FSC) was founded in 1993 as a voluntary certification for sustainable forestry, promoting environmentally sound, socially beneficial, and economically viable management of the world's forests.

Nowadays, FSC has the most extensive certified supply chain network, enabling connections between markets and sustainable forestry – including over 200 million hectares of forest managed according to FSC standards.

FSC's high standards and credibility help the system grow as solidly as an oak trunk. At the same time, new solutions continue to arise over the years to address incoming challenges, playing a crucial role in biodiversity conservation and climate change mitigation while ensuring healthy and resilient forests for all, forever.

The objective of Forest Stewardship Council (FSC) standards is to ensure that these programs are managed in a competent, consistent, impartial, transparent, rigorous, reliable and credible manner, thereby facilitating their acceptance on a national and international basis and so furthering international trade and promoting sustainable development.

This standard was developed to ensure conformity with applicable requirements of the ISEAL Code of Good Practice for Assuring Compliance with Social and Environmental Standards V1-0 and compatibility with DIN EN ISO/IEC standard 17065:2013-01 Conformity assessment – requirements for bodies certifying products, processes and services.

The purpose of the FSC Standard is nurturing responsible forestry so forests and people can thrive, sustainable forest management, operating the world's most rigorous and trusted forest certification system.

It verifies sustainable sourcing from the forest to store shelves by "check tree" label.

It is developing new solutions focused on:

- Responsible Sourcing: Helping businesses work with forests responsibly
- Conservation: Maintaining and enhancing forest value
- Restoration: Accelerating forest recovery

ETKO issues certification using the FSC for the following scopes:

- ~~• Forest management (including controlled wood forest management) and~~
- Chain of custody (including controlled wood chain of custody);


2 Purpose

This procedure defines the administrative aspects of the application, evaluation, and certification process for product certification programs. ETKO operates under ISO 17065 standards for the certification scheme(s) covering its certification activities as listed below. ^{7.1.1}

The requirements against which the products of a client are evaluated according to these standards and regulations. ^{7.1.2}

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The explanations required as to the application of these documents for a specific certification scheme are formulated by relevant and impartial persons or committees, possessing the necessary technical competence, and they are available on the ETKO website and relevant scheme owners' websites. ^{7.13}

3 Responsibilities

Managing Director, QMR, Certifiers, and Inspectors are responsible for the proper implementation of this procedure.

4 Records

GP 01 F 06 Operator Contract-FSC
 GP 01 F 08 FSC Application Form
 GP 01 F 13-E Cost Estimate FSC
 GP 02 F 10 App Pack Review Form FSC
 GP 14 F 02 Noncompliance Register
 GP 15 F 01 Notification of Noncompliance
 GP 25 F 01 ETKO Checklist FSC
 GP 24 F 08-H Scope Certificate for FSC
 GP 25 F 02 Labeling Release Form for FSC
 OP 01 F 02-A FSC Review Report
 OP 01 F 16 Control Notes
 OP 01 F 24-D Mass Balance Table FSC
 OP 01 F 32-K FSC Certification Decision Form
 OP 01 F 34-C Inspection File Review Checklist FSC
 OP 01 F 37 Attendance Record
 OP 05 F 10 Inspection Detailed Plan FSC

5 References


GP 05 Appeal & Complaint and Disputes
 GP 07 Fees Procedure
 GP 11 Use of Logo Licensees Mark of Conformity
 GP 15 Term. & Red. & Susp. & Withd. Of Certification
 GP 28 Grading & Reporting & Closing NCR
 GP 31 Anti-Bribery and Corruption Policy
 GP 25 FSC Certification Procedure
 TI 05 Sampling Method
 TI 14-D Fee Structure FSC
 TI 37 Annex B-Management of Auditing Time for FSC
 TI 49-G Catalogue of Measures FSC
 TI 57 Instruction for Inspection Planning
 TI 72 Translation Requirement
 TI 80 Technical Terminology for Certification

6 Application

6.1 Application Procedure

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ETKO provides applicants with all the necessary information on the certification process and the FSC certification requirements.

When any document developed by ETKO mixes requirements from FSC and from other sources, this is made explicit in the document.

When receiving an application for certification, ETKO obtains all the necessary information to plan and conduct the certification process in accordance with applicable FSC certification requirements.

~~ETKO ensures that applications for forest management or controlled wood forest management certification include a definition of the scope in terms of individual management units.~~

ETKO ensures that applications for chain of custody certification include a definition of the scope in terms of FSC product groups and sites to be evaluated.

~~For applicants for forest management certification except for small or low intensity managed forests, ETKO at minimum enters the following information in the FSC certification database (info.fsc.org) once it is available and at the latest thirty (30) calendar days before the main evaluation:~~

- ~~• forest type;~~
- ~~• total area in ha (based on Annual Administration Fee categories);~~
- ~~• anticipated evaluation time frame:

 - ~~○ the proposed dates of the pre evaluation (if applicable) and of the main evaluation;~~
 - ~~○ as long as the dates have not been agreed upon with the client, the entry reads "not yet scheduled".~~~~
- ~~• evaluation contacts:

 - ~~○ name of designated audit team leader;~~
 - ~~○ contact for stakeholder comments (name and e-mail address of ETKO's contact);~~
 - ~~○ link to the FSC section of ETKO's website.~~~~

ETKO requires applicants for certification to disclose current or previous applications or certifications with FSC or other forestry certification schemes in the last five (5) years.

If applicable, ETKO obtains the latest available FSC audit report of the last five (5) years from the applicant and consider it in the certification process.


ETKO rejects applications for certification of management units or sites that are already covered by a valid or suspended FSC certification, except where a certification transfer process.

The applicant completes "ETKO Disclosure Questions for Association with FSC" background questionnaire and "ETKO Commitment for Policy for Association" as part of their application process. Upon completion of the background questionnaire, the applicant may pursue FSC certification and/or membership, unless immediate risk to violation of Policy for Association has been identified.

If a stakeholder provides substantial information that an applicant or associated individual or organization is in violation of Policy for Association, then FSC-PRO-01-009 Processing FSC Policy for Association Complaints is followed.

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FSC may review the background information provided, using a combination of risk profiling services tools such as Controlled Wood National Risk Assessments and others. Failure to disclose all required information may be grounds for the initiation of an evaluation in accordance with FSC-PRO-01-009 Processing FSC Policy for Association Complaints. If the screening produces substantial information that the individual or organization may be in violation of the Policy for Association, then the procedure FSC-PRO-01-009 Processing FSC Policy for Association Complaints shall be initiated, and the association decision delayed until the process has been completed. The individual or organization shall be given the opportunity to withdraw the application if they do not want to move forward with the evaluation.

6.2 Contract

ETKO ensures that a legally enforceable certification agreement (GP 01 F 30) is signed by ETKO and the client prior to the main evaluation and after the client has obtained a 'License Agreement for the FSC Certification Scheme'.

Also ETKO ensures that applicants for certification obtain a 'License Agreement for the FSC Certification Scheme' before entering into a certification agreement with ETKO.

The certification agreement (GP 01 F 30) cites the relevant FSC normative documents and rules and regulations in its most recent version and explains where the client can obtain the most recent version online.

6.3 Application Review

ETKO reviews the information obtained from the applicant to ensure that:

- the information about the applicant and the processes is sufficient for planning and conducting the certification process;
- any known differences in understanding between ETKO and the applicant is resolved, including agreements on the applicable normative requirements;
- the scope of certification is defined;
- ETKO has the competence, capability and resources to perform the required certification activities.

7 Audit Planning

7.1 Annual Audit Plan:

On latest 31st of March of each year, Control Division Responsible prepares the annual audit plan with the support of the Control Division Assistant for the new season Inspections, and the Inspections are carried out according to this plan.^{7.1.1}

The annual plan provides detailed information about the Audit Team including Auditors and the Lead Auditor the Inspections to be carried out and summarizes for each Operator the number of Inspection days, addresses, etc. And it helps the Control Division Responsible to manage Inspection activities and resources more efficiently.

Regarding the audit team ETKO ensures that;

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- The audit team always includes a qualified auditor and audit team leader. (NOTE: The 'team' may consist of a single qualified auditor who is then also the leader of the 'team'.)
- At least one (1) audit team member is fluent in the main language of the area in which the audit takes place; or a designated independent interpreter, who is not an employee or consultant of the client under evaluation; or fluent in the corporate language, if the client provides a written declaration that confirms that all of the following criteria are met:
 - all relevant records and procedures relating to FSC requirements are written and understood in the corporate language; and
 - all management staff and those with FSC responsibilities can communicate fluently in the corporate language.
- ~~• For forest management audits: additionally, a forest management audit team includes auditor(s) and/or technical experts with the experience and qualifications to audit all aspects of the FSC Principles and Criteria, taking account of the scale and complexity of the area to be assessed. Key considerations for the selection of auditors and technical experts for an audit includes experience and qualifications in relation to relevant forest management, social, environmental and economic issues (see Box 2 below for further details).~~
- ~~• For forest management audits and controlled wood audits at forest level: at least one (1) team member is a resident in the country in which the audit takes place or in a nearby country with similar forest conditions.~~
- ~~• For controlled wood audits at forest level:

 - at least one (1) team member with the experience and qualifications to audit relevant aspects of the controlled wood standard taking account of the scale and complexity of the area to be assessed. Key considerations for the selection of auditors for an audit includes experience and qualifications in relation to the controlled wood categories being audited;
 - at least one (1) team member is a qualified forest management auditor.~~
- For chain of custody audits: at least one (1) team member who has knowledge of the critical characteristics of the operational processes under evaluation.
- ~~• The competence of an audit team may be supplemented by that of technical expert(s). In this case the following requirements apply:

 - the time spent by technical experts is specified separately in the audit plan;
 - their participation in the audit is limited to the task they are requested to do and each technical expert is assigned to the responsibility of a specific auditor in the audit team;
 - the technical expert(s) is accompanied by the auditor to whom they are assigned;
 - if deemed necessary, the technical expert(s) may be allowed to perform interviews and other specified tasks unaccompanied, as instructed by the audit team leader;~~

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~~o technical expert(s) neither makes conclusions on the conformity with certification requirements nor communicate them to the client.~~

Box 2: Key considerations for selection of audit team members for forest management audits (refers to auditors and technical experts)

Forest management issues:

~~The audit team includes members with experience in forest management of the size and complexity under evaluation. For example, if a large plantation is being audited, the team includes members who have themselves managed operations of a similar type or who have professional experience, for example as paid consultants or advisors to similar kinds of operations.~~

Social issues:

~~If it is likely that forest management has significant interactions with neighboring communities, raising questions related to indigenous or community rights and tenure issues, or has social high conservation values (HCV), then the team includes expert(s) who have knowledge of these issues, appropriate language/dialect, and experience of interacting with indigenous peoples and communities in the region concerned. The team includes members with knowledge and capacity to evaluate workers' rights such as health and safety aspects and application of employment legislation in the region.~~

Environmental issues:

~~The audit team includes members with the experience and knowledge to audit the forest management organization's process for identifying HCVs and interviewing stakeholders on the presence of ecological HCVs in the area to be evaluated, as well other environmental issues that are likely to be of importance during the audit. Qualification or professional experience in the area of forest ecology for the forest ecosystems under evaluation (whether natural or planted) is likely to be of key importance. General knowledge of the management of rare or endangered species that are likely to be present in the forest area, or knowledge about key environmental impacts such as those on hydrology or soils may also be required.~~

Economic issues:

~~The audit team includes members with knowledge of the economic implications of forest management decisions in the country concerned (e.g., the economic implications of changes to silvicultural systems, set aside areas, etc.). Additionally, the audit team includes members with knowledge in evaluating aspects relating to the economic performance of the client (e.g. understanding budgets, financial planning and financial reports) and have the ability to assess the economic viability of the forestry operation.~~

The following auditor rotation requirements are applied based on number of certificate holders per country:

- with more than twenty (20) certificate holders no auditor serves as a member of the audit team for more than three (3) consecutive audits of the same client;
- with eleven (11) to twenty (20) certificate holders no auditor serves as a member of the audit team for more than three (3) consecutive audits of the same client. Where a client is audited by the same auditor on more than (3) consecutive audits, ETKO

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provides a justification why it was not possible, or feasible to rotate the auditor and demonstrates how an impartial and objective evidence-based audit is ensured;

- with less than ten (10) certificate holders auditor rotation after three (3) consecutive audits is recommended by FSC.

For all other types of audits ETKO ensures that no client is audited by the same auditor on more than three (3) consecutive audits. Where a client is audited by the same auditor on more than (3) consecutive audits, ETKO provides a justification why it was not possible, or feasible to rotate the auditor and demonstrates how an impartial and objective evidence based audit is ensured.

7.2 Onsite Inspection Plan

An audit team in conformity with the Audit team requirements stated in SP 05 procedure is assigned for each audit.

When necessary, arrangements are completed for Inspection an audit plan is sent to the operator to prepare his operation for evaluation.

8 Audit Protocol

The processes and products of a client are audited against the applicable requirements specified in the FSC normative documents.

~~ETKO conducts audits for forest management certification in accordance with ETKO Forest Management Evaluation Procedure.~~

ETKO conducts audits for chain of custody certification in accordance with ETKO Chain of Custody certification Procedure.

~~ETKO conducts audits for controlled wood certification in forest management organizations in accordance with ETKO Controlled Wood Certification in FM Organizations Procedure.~~

8.1 Participation of external observers in on-site FSC certification audits


External observers are only allowed to participate in on-site audits with prior written approval from ETKO Client and ETKO.

The request to participate in an audit as an observer is submitted as a written application by using ETKO format to ETKO at least four (4) weeks prior to the scheduled start of the on-site audit. Participation in the audit may be delayed for twelve (12) months or more depending upon the ability of ETKO Client, ETKO and/or ASI to accommodate the request in the planning and logistics of an upcoming audit.

ETKO forwards the application to ETKO Client together with a copy of this procedure and a request for a timely response. ETKO Client have the opportunity to reject the application based on substantiated concerns related to the request. ETKO evaluates the concerns; unsubstantiated rejections are not accepted. The grounds for rejection include, but are not limited to:

- a) A conflict of interest through being employed or contracted by a competitor;
- b) A track record of breaking confidentiality agreements;

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- c) A track record of audit misconduct;
- d) Evidence of an intended disruption of the audit.

That an observer has been publicly critical of the operation in the past is not allowed to be used as grounds for rejection.

The result of the application is communicated to the applicant observer within a timeframe by ETKO that is not prevent the observer from participating in the audit. Any rejection of an application, by either ETKO Client, ETKO or ASI, is accompanied by a justification specifying the reason for the objection.

As a transparent certification scheme, ETKO has a positive attitude towards the participation of observers in audits

8.1.1 Roles and responsibilities of observers

Observers are not part of the audit team, though they are allowed to accompany any member of the team at any time and have access to any documentation and sites that are available to the audit team within the scope of the evaluation and unless ETKO Client limited the access to sites, documents or other sources of information to observers by addressing in the opening meeting if classified as confidential or dangerous.

Observers are allowed to witness the work of audit teams in the field in order to contribute to the transparency of the process but are not interfere with the audit.

The team leader may exclude the observer from an audit for justified reasons, particularly in cases of repeated interference with the audit, insult or threat against the audit team or ETKO Client, or ignorance regarding health and safety instructions.

For the period of the audit, the observer recuses any status they have as a stakeholder or proxy for a stakeholder. The role of an observer does however not change or influence the person's role and rights as a stakeholder in the overall certification process.

A formal Non-Disclosure and Confidentiality Agreement is signed between observers and ETKO prior to audits, and with ASI prior to assessments. On request, a Non-Disclosure and Confidentiality Agreement is also signed with ETKO Client.

Unless agreed otherwise in advance, observers are responsible for their arrangements and costs of travel, lodging, and meals.

ETKO Client, ETKO, FSC and ASI are not liable for any loss or damage of any sort suffered or incurred by the observer during an audit.

Complaints are addressed through the FSC Dispute Resolution System.


9 Audit Results

ETKO evaluates each nonconformity identified in the audit to determine whether it constitutes a minor or major nonconformity according to Catalog of Measure.

The auditor may also identify the early stages of a problem that does not yet constitute a nonconformity, but which the auditor considers may lead to a future nonconformity if not

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addressed by the client. Such observations are recorded in the audit report as 'observations' for the benefit of the client.

Nonconformities are transformed into corrective action requests that at minimum include a description of the nonconformity, the objective evidence on which the nonconformity is based and a timeline within which the nonconformity are corrected by the client.

The auditors presents the nonconformities during the audit closing meeting and ETKO at latest inform the client of the final wording and grading of all nonconformities with the submission of the finalized audit report to the client after the certification decision has been taken.

ETKO informs the client if an additional on-site audit is required to verify that nonconformities have been corrected.

9.1 Reporting

ETKO documents the findings and conclusions of all audit activities prior to review and decision making in a certification report in conformity with the report writing requirements specified in:

- ~~a) FSC-STD-20-007a for forest management certification reports;~~
- ~~b) FSC-STD-20-007b for forest management public summary certification~~
- c) FSC-STD-20-011 for chain of custody certification reports;
- ~~d) FSC-STD-20-012 for controlled wood forest management certification reports.~~

10 Audit Review ^{7.5}

ETKO assigns at least one (1) person to review all information and results related to the audit. The review is carried out by person(s) who have not been involved in the audit process.

Recommendations for a certification decision based on the review are documented, unless the review and the certification decision are completed concurrently by the same person.


~~Draft forest management certification reports of main evaluations is submitted to a formal peer review process unless the management unit under evaluation meets the specification as a small or low intensity management unit or small or low intensity group (see FSC-STD-01-003) in the country in which the evaluation takes place.~~

~~The formal peer review process for draft forest management certification reports includes the following requirements:~~

- ~~• the report is reviewed by at least one (1) independent peer reviewer with the experience and technical knowledge necessary to evaluate the adequacy of the report and the validity of the proposed certification decision and is reviewed by additional peer reviewers with specialist knowledge (e.g. concerning Indigenous Peoples rights or high conservation values), where necessary;~~
- ~~• in the case of evaluated management units that meet the eligibility criteria for mandatory pre-evaluations as defined in FSC-STD-20-007 the report is reviewed by a second peer reviewer, who is selected according to the knowledge related to the eligibility category of FSC-STD-20-007, i.e. knowledge about plantation management, boreal or tropical forest management, or high conservation values (as applicable);~~
- ~~• the peer reviewer(s) operates according to clear terms of reference, which include the requirement to comment explicitly on:~~

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- ~~○ the adequacy of the field work as the basis for making a certification decision;~~
- ~~○ the clarity of presentation of the observations as the basis for a certification decision;~~
- ~~○ whether the proposed certification decision is justified by the observations presented.~~
- ~~● peer reviewer(s) is not full or part-time employees of ETKO, and is subject to the same requirements relating to independence and confidentiality as other personnel with input into the certification decision;~~
- ~~● the reviewer(s) takes account of the local and national context with regards to forest management, and considers environmental, social and economic perspectives;~~
- ~~● the comments of the peer reviewer(s) is attributed and documented;~~
- ~~● ETKO responds in writing to the peer reviewer(s)' comments, and provide the peer reviewers with a copy of its response;~~
- ~~● ETKO finalizes the audit report taking the comments of the peer reviewer(s) into account.~~

11 Certification Decision ^{7.6}

ETKO is responsible for, and retains authority for, its decisions relating to certification.

ETKO assigns a certification decision making entity to make the certification decision based on all information related to the audit, its review, and any other relevant information. The person(s) of the certification decision making entity does not have been involved in the audit process.

The certification decision making entity:

- have clear rules for membership, including requirements for qualification, experience and impartiality;
- consists of one or more individuals, where none of these individuals have any conflicts of interest, in particular financial or other commercial interest in the outcome of the certification decision; (NOTE: This does not refer to a regularly paid salary of an employee who is member of the certification body's decision making entity.)
- not include individuals who have taken part in the audit as audit team leaders, auditors or technical experts.


The person(s) of the certification decision-making entity is employed by or is under contract with ETKO.

ETKO makes and communicates certification decisions to the client after the main evaluation according to the following maximum timelines and requirements:

- six (6) months in the case of chain of custody evaluations;
- ~~● twelve (12) months in the case of forest management and controlled wood forest management evaluations, or~~
- ~~● up to eighteen (18) months in exceptional and justified cases for forest management evaluations, where due to major nonconformities a positive certification decision cannot be made within twelve (12) months. Between twelve (12) months and (18)~~

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~~months an on-site audit is required to verify the validity of the main evaluation findings and to evaluate any changes to the management system.~~

When communicating a negative certification decision ETKO provides the reasons for this decision.

12 Registering of certification status and issuing of certificate

ETKO registers the certification status in the FSC certification database (info.fsc.org) after the certification decision making entity has granted certification. The registration requires the entry of all specified data, together with an electronic copy of the public summary certification report (as applicable).

In the case of FSC announcing a malfunction of the on-line registration service, ETKO informs ASI and FSC that certification or recertification has been granted within ten (10) days of the certification decision.

ETKO keeps its data entries and public summary certification reports accurate and up-to-date.

A certificate is only issued after a positive certification decision has been taken by the certification decision making entity and after it has been registered in the FSC certification database, together with the public summary certification report.

All ~~forest management and~~ chain of custody certificates issued by ETKO within the scope of its FSC accreditation includes:

- the FSC logo, which is no smaller than the logo of ETKO;
- the name and address of ETKO;
- the legal name and registered address of the client;
- a description of the scope of certification, including a reference to the type of certificate (single, group or multi-site), general description of the type of products covered by the certification according to FSC-STD-40-004a and a reference to the specific normative document that the client has been evaluated against, as defined by ~~FSC-STD-20-007~~ and FSCSTD-20-011 accordingly. In the case of project certificates, the scope of certification includes the specification of whether partial or full project certification has been awarded;
- a reference to the FSC certification database (info.fsc.org) for the full list of product groups covered by the certification;
- a clear statement to the effect that the certificate remains the property of ETKO that issued it, and that the certificate and all copies or reproductions of the certificate is returned or destroyed if requested by ETKO;
- the date of issue of the certification;
- the date of expiry of the certification together with the disclaimer “The validity of this certification shall be verified on (info.fsc.org)”; (NOTE 1: The expiry date requirement does not apply for project chain of custody certification.)
- an issue number (for re-issued or renewed certificates);
- the signature of the individual(s) of ETKO assigned such responsibility;

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- a disclaimer stating: "This certificate itself does not constitute evidence that a particular product supplied by the certificate holder is FSC certified ~~for FSC Controlled Wood~~. Products offered, shipped or sold by the certificate holder can only be considered covered by the scope of this certificate when the required FSC claim is clearly stated on sales and delivery documents";
- the certification registration code issued by ETKO and of the form according to the Table 1 below:

Table 1: Certification registration codes for the different types of certifications	
Type of certification	Certification registration code
Forest management certification	XXX-FM-#####-***
NOTE 2: This type of certification is issued to applicants that solely include ecosystem services in their certification scope and that do not intent to sell any forest products according to their management objectives, e.g. in the case of National Parks, conservation areas, water protection areas.	
Joint forest management and chain of custody certification	XXX-FM/COC-#####-***
Chain of custody certification	XXX-COC-#####-***
Controlled wood chain of custody certification (against FSC-STD-40-005)	XXX-CW-#####-***
Controlled wood forest management certification (against FSC-STD-30-010)	XXX-CW/FM-#####
NOTE 3: The controlled wood code issued within a chain of custody certification shall have the same 6 digits as the chain of custody code.	
Project chain of custody certification	XXX-PRO-#####-***
NOTE 4: XXX are the initials of the certification body agreed with ASI, ##### is a unique six digit number or combination of numbers and letters, and *** is a subcertification code issued only to the members of group or multi-site certification and may be numbers, or upper case letters or a combination of numbers and upper case letters.	
NOTE 5: If certification is withdrawn and later re-granted to the same legal entity the original certification registration code may be used.	

For reasons of clarity ETKO does not use the same code number for valid certifications granted to different legal entities (i.e. ETKO does not grant a chain of custody certification XXX- COC-123456 to company A, and an FM certification XXX-FM-123456 to company B).


For each certification only one (1) group or multi-site certificate is issued to the central office / group entity with a list of all Participating Sites either on the certificate itself or in an appendix or as otherwise referred to in the certificate.

The scope specified on the group or multi-site certificate makes clear that the covered products and processes/ activities are performed by the network of Participating Sites, and not necessarily by each of them.

Any wording, including the claim of conformity, is included on certificates in addition to the information as required in this procedure is subject to prior written approval by FSC.

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13 Granting, maintaining, extending, reducing, suspending, withdrawing, reinstating and denial Certification

13.1 Granting Certification

ETKO only grants (re)certification when its client:

- a) has entered into and holds a valid and most recent version of the 'License Agreement for the FSC Certification Scheme', where the right to use the FSC trademarks is not suspended;
- b) conforms with the requirements of all applicable FSC normative documents, which means that major nonconformities shall be corrected before granting of certification and minor nonconformities are corrected within the maximum timeline specified by ETKO. Open minor nonconformities do not prevent granting of certification;
- c) signed a certification agreement with ETKO

The period of validity of FSC certification does not exceed five (5) years.
Recertification is granted as the result of a re-evaluation.

The specified period of validity of certification is extended for a single exceptional extension of up to six (6) months in order to permit re-evaluation to be completed, provided that justified by circumstances beyond the control of ETKO and its client. ETKO takes the following steps: (Note: This does not apply in the context of chain of custody project certification.) (Note: Justifiable circumstances for an extension exclude problems in planning or scheduling an audit per se.)

- a) record such circumstances;
- b) update the entry in the FSC certification database (info.fsc.org).

13.2 Maintaining Certification

ETKO only approves maintenance of certification when its client:

- a) conforms and continues to conform with all ETKO's conditions for maintaining certification;
- b) conforms with all ETKO's and FSC's requirements regarding claims, logos, certification marks or trademarks;
- c) corrects any nonconformities with applicable FSC normative document(s) within the maximum period specified by ETKO;
- d) continues to pay all specified fees and costs in a timely manner;
- e) undergoes surveillance as determined by ETKO and as required by FSC;
- f) holds a valid version of the 'License Agreement for the FSC Certification Scheme', where the right to use the FSC trademarks is not suspended.


13.3 Extending and reducing the scope of certification

The conditions necessary for ETKO to change the scope of certification includes the following requirements:

- a) the change of scope does not include or result in an extension of the certification's expiry date beyond the time period for which it was originally granted;

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- b) where applicable, the old certificate is returned to ETKO or destroyed by the client, and a new certificate issued reflecting the change of scope.

An increase or decrease in the Participating Sites of a group certification is not considered a change of scope unless, in the opinion of ETKO, the change requires significant changes to the group certification holder's management systems.

A change of scope is necessary as a result of changes in ownership, structure of the organization, or management systems when the client inform ETKO within ten (10) days of changes in the ownership, structure of the organization (e.g. changes in key managerial staff), certified management systems or circumstances which relate to the implementation of FSC certification requirements.

13.4 Suspending and Withdrawing Certification

When ETKO suspends or withdraws certification, ETKO updates the certification status in the FSC certification database (info.fsc.org), together with the effective date and reason of suspension or withdrawal within three (3) days of the suspension or withdrawal.

ETKO issues a letter of notification to clients whose certification has been suspended (GP 15 F 08) or withdrawn (GP 15 F 09).

ETKO keeps the evidence that the client has received the letter of notification (e.g. client's written acknowledgement of receipt, delivery receipt from the mail service).

13.5 Reinstating Certification

ETKO reinstates certification after suspension if all major nonconformities have been corrected; and in cases where certification has been suspended for more than twelve (12) months, a surveillance audit has been conducted.

If certification is reinstated after suspension or if the certification scope is reduced as a condition of reinstatement, ETKO makes all necessary modifications to formal certification documents, public information and authorizations for use of FSC trademarks.

13.6 Denial Certification

ETKO may deny certification to a client when fundamental and demonstrated reasons exist (e.g. illegal activities).

13.7 Transfer of FSC Certificates and License Agreements

13.7.1 Issuing of a certificate to a former certificate holder after expiry or termination of the certificate

ETKO issues an FSC certificate to a new client at any time after the expiry or termination of the client's existing certificate with another certification body, based on a full evaluation according to FSC certification requirements.


If the main audit for this client is conducted within a period of twelve (12) months from the expiry or termination of the former certificate, ETKO considers any major or minor corrective actions which had not been closed at the time of expiry / termination which are taken from ASI.

ETKO checks Terminated certificates in the FSC database.

13.7.1 Fundamental principles for a transfer of certificates

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FSC certificates can only be transferred once within the 5-year's period of validity of a certificate. If a client wishes to change certification body more than once within the 5-year's period, a full FSC certification evaluation takes place.

FSC certificates cannot be transferred in the following situations:

- a) The certificate is suspended;
- b) Majors corrective actions have not been closed (they need to be closed to the satisfaction of the preceding certification body before the certificate can be transferred);
- c) ETKO and preceding CB cannot agree on the transfer date;
- d) Relevant documentation about the certificate holder (records, history of CARs) is not being made available to ETKO.

The certificate holder also may send ETKO directly all relevant documentation about them such as records, history of corrective actions.

13.7.2 Transfer procedure

Once the holder of an active certificate (i.e. a certificate that is not suspended, withdrawn, terminated or expired) should inform their current certification body that they are applying for a certificate transfer with ETKO.

The period of validity of an FSC certificate shall not exceed five years. Thus, the expiry date of the succeeding certificate will be the same as the expiry date of the preceding certificate;

The scope of the succeeding certificate will be the same as the scope of the preceding certificate. If the certificate holder is requesting a change in scope, ETKO evaluates this request in line with relevant requirements from FSC-STD-20-001;

c) All minor corrective action requests that are applicable to the preceding certificate remain applicable to the succeeding certificate, and are evaluated by ETKO according to the defined timelines;

d) The results of any ASI surveillance assessment or spot audit regarding the compliance of the certificate holder to certification requirements is applicable to ETKO;

e) ETKO proposes a transfer date to the preceding certification body and the certificate holder on which all rights and obligations for maintaining the certificate are passed from the preceding certification body to ETKO. ETKO keeps a record of the agreed date;

f) ETKO carries out a transfer audit within three (3) months of the agreed transfer date according to the requirements for a surveillance evaluation as outlined in ~~FSC-STD-20-007~~ and FSC-STD-20-011 respectively. This audit includes a review all pending minor corrective actions which were issued by the preceding certification body.

If the on-site transfer audit is conducted in a way that satisfies all the formal requirements for a main evaluation, a new 5-years certificate is issued.


13.7.3 Transfer of the license agreement

The license agreement (and thus the license number) for the FSC certification scheme stays valid in case of a certificate transfer and therefore does not require any transfer from one certification body to ETKO. By migrating the database entry, the license agreement is transferred automatically.

13.7.4 Migrating the database entry in case of certificate transfers

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Prior to the date of transfer, the preceding certification body removes all data from the certificate holder's entry in the FSC database (<http://info.fsc.org>) that they consider to be confidential.

All objects, files/attachments and associated history records that are not removed by the transfer date will be transferred to the succeeding certification body.

Prior to the date of transfer, ETKO as a succeeding certification body submits a request to FSC (database@fsc.org) containing the new certificate code no later than ten (10) business days prior to the scheduled transfer date ETKO will allocate to the transferred certificate holder.

Following the transfer, ETKO as a succeeding certification body checks the database entry for correctness and completeness regarding the following updates:

- a) The ownership of records to ETKO;
- b) The CB code and number to the requested code;
- c) The certificate status history with a status of 'Transferred' and in the comments field is included the old certificate code and new certificate code. The date from field is the date of transfer, the date to field blank.

NOTE: The old certificate code appears in a separate field on the certificate record which can be searched in future from the public certificate search.

The payment of the Annual Administration Fee for transferred certificates is regulated in the FSC Annual Administration Fee Policy.

14 Surveillance ^{7,9}

Surveillance evaluations of FSC clients take place at least once per calendar year and additionally for chain of custody audits not later than fifteen (15) months after the last audit and may be more frequent depending on factors such as:

- the scale of the operation (e.g. the area of an management unit, the quantity of production in the case of a manufacturer, or the value and/or volume turnover in the case of a trader);
- the intensity of resource management in the case of a management unit (e.g. the frequency and level of timber harvest);
- the complexity of the management system (e.g. the chain of custody control system);
- results of risk assessment in the case of group certification;
- the ecological or social sensitivity of the resource base to management intervention;
- the experience and track record of the operators involved (managers and personnel, contractors);
- the number and nature of any nonconformities identified by ETKO;
- the number and nature of any complaints submitted by stakeholders.

NOTE: FSC and ASI reserve the right to request higher surveillance frequencies from ETKO for certain geographical areas or certification services that are deemed "challenging" or are linked to "high" or "specified risk" as the result of an internal risk assessment.

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ETKO assigns one (1) or more person(s) to make the certification decision to continue, suspend or withdraw certification based on information collected from surveillance activities and their review.

The occurrence of five (5) or more major nonconformities in a surveillance audit is considered as a breakdown of the clients' management system and certification is suspended within ten (10) days of the certification decision being taken.

ETKO suspends certification at latest three (3) months after the closing meeting of a surveillance audit, if a certification decision to maintain the certification cannot be taken due to circumstances beyond the control of ETKO.

NOTE: Circumstances beyond the control of ETKO include, but are not limited to, the client or other parties preventing the use of audit findings and/ or the delayed or declined acceptance of audit findings or the audit report by the client.

The maximum period that certification remains suspended is twelve (12) months (upon justification and at the discretion of ETKO the timeline may be increased to eighteen (18) months to allow the client to correct nonconformities). After this period, the certification is withdrawn, unless all major nonconformities have been successfully corrected and a surveillance audit was conducted in case the timeline of suspension exceeded twelve (12) months.

ETKO records the certification decision to maintain certification for each surveillance evaluation.

15 Changes affecting certification

ETKO informs all affected clients of changes to FSC certification requirements or its own procedures affecting certification requirements, within thirty (30) calendar days that such changes are approved by the approval body.

Clients that were certified prior to the effective date of approval of a new or revised applicable FSC normative document is audited against the requirements of the new or revised document in accordance with the applicable transition requirements.

ETKO considers other changes and circumstances affecting certification, including changes initiated by the client, and decides upon the appropriate action in accordance with the requirements of applicable FSC requirements. This includes evaluation and the issuance of revised certificates to extend or reduce the scope of certification. These actions are completed in accordance with applicable parts of this procedure include the rationale for excluding any of the above activities.


NOTE: Circumstances affecting certification are e.g. armed conflicts or epidemics that hinder a certification body in implementing their FSC accredited certification program in order to confirm the validity of certification.

16 FSC Trademarks and Promotion

ETKO is responsible for the approval of the FSC trademark use by its clients according to FSC trademark requirements, relating to both on-product and promotional uses.

ETKO controls the FSC trademark use by its clients, both on-product and promotional uses by:

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a) auditing the trademark use at a minimum at the time of the surveillance audit and re-evaluations (sampling can be applied); and

b) addressing cases of detected or reported trademark misuse by its clients.

ETKO does not promote standards of other forestry certification schemes as equivalent to FSC standards. When ETKO offers certification services of other forestry certification schemes, ETKO ensures that the FSC system and standards clearly and accurately are differentiated relative to the other schemes in promotional media and communication to clients according to specific information as provided by FSC.

17 Disclosure of Information ^{4,6}

ETKO maintains, and makes easily accessible on its website, the following:

- a) information about ETKO's scope of FSC accreditation;
- b) a description of the sources of funding and general information on the fees charged to clients;
- c) a list of bodies providing outsourced services to ETKO for FSC-accredited certification programs;
- d) a description of the rights and duties of clients, including requirements, restrictions or limitations on the use of ETKO's name and FSC trademarks and on the ways of referring to the certification granted;
- e) information about procedures for handling complaints and appeals;
- f) a link to the FSC certification database (info.fsc.org);
- g) a link to the FSC normative documents for certification, according to ETKO's accreditation scope.

ETKO disclose all necessary above information and documents via website as www.etko.com.tr.

18 Exchange of Information

ETKO informs affected clients within thirty (30) calendar days after the reduction, suspension or withdrawal of its scope of FSC accreditation, that its accreditation scope has been reduced, suspended or withdrawn. The clients are informed that they have to seek a new certification body within six (6) months to keep their certification valid, as applicable.

19 Avoidance of conflict of interest

ETKO explains its findings and/or clarify the requirements of normative documents but does not give prescriptive advice or consultancy as part of an audit or training.

The following conditions are met for each of the categories:

- Training:

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- where the training relates to FSC requirements, it only covers generic information that is freely available in the public domain;
- the training does not provide company-specific solutions and is not conducted one-on-one with the certification client.
- Templates:
 - are publicly available;
 - do not provide company specific solutions;
 - include a disclaimer, specifying that the template is no guarantee for conformity with FSC requirements. It is the responsibility of the client to conform with FSC requirements;
 - the use is voluntary.

19.1 General

That an individual or organization possesses an interest does not necessarily mean that the interest will result in a conflict, or that it is beyond management. It is only when a conflict of interest, either at an institutional or individual level, is not acknowledged and managed that it runs the risk of compromising the integrity of decisions and of the organization. Identifying where potential conflicts of interest are likely to arise and managing for these conflicts before they arise can help to strengthen the organization as a whole.

19.2 Threats to impartiality

The following types of threats to impartiality can occur at the level of ETKO and/ or ETKO’s personnel:

- self-interest/personal benefit (such as financial or other personal self interests): threats that arise from acting in one’s own interest;
- institutional benefit
- self review/assessing one’s own work: threats that arise from reviewing own work or work done by colleagues;
- over-familiarity of parties involved in audits/personal loyalty: threats that arise e.g. from auditors being influenced by a close relationship with an auditee;
- intimidation: threats that arise from e.g. auditors being (or believing that they are being), openly or secretly coerced by auditees or by other interested parties;
- advocacy: a body or its personnel acting in support or in opposition of an auditee, which is at the same time its customer in e.g. the resolution of a dispute;
- competition: e.g. between auditee and contracted auditor.

19.2 Safeguards to auditor impartiality

ETKO has in place safeguards that mitigate or eliminate threats to auditor impartiality:

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- Prohibitions, restrictions, disclosures, policies, procedures, practices, standards, rules, institutional arrangements, and environmental conditions. These are regularly reviewed to ensure their continuing applicability.
- Preventive safeguards, for example, an induction program for newly hired auditors that emphasizes the importance of impartiality;
- Safeguards that relate to threats arising in specific circumstances — for example, prohibitions against certain employment relationships between auditors’ family members and ETKO’s clients and;
- Safeguards whose effects are to deter violations of other safeguards by punishing violators;

19.3 Safeguards for self review threat:

- Staff abide by a conflict of interest procedure that defines when they are required to excuse themselves from discussions or decision-making;
- The procedure includes criteria on the time period, if allowed, between involvement with a client and participating in an audit or decision affecting the client;
- Conflict of interest declarations list relevant employment history, including unsuccessful job applications, when this may be a source of contention;
- Declarations of interest and the decision taken for managing them (removal of individual from discussion and/or decision) are included in meeting minutes;
- Clients have the ability and right to object to a member of the audit or decision team.

20 The excision of areas from the scope of certification

There are situations in which a forest area as whole may be considered to comply with FSC standards although there are specific areas of the forest in which all of the requirements are not met for reasons beyond the control of the managers.

There are occasions when it is acceptable to exclude or ‘excise’ specific areas from the scope of an evaluation without the necessary loss of an FSC certificate for the remaining area.

~~The following criteria are applied to such certifications:~~

- ~~1. Management of factors beyond the control of the forest managers FSC certification takes place if ETKO ensure that the following criteria are met:

 - ~~a. The managers make all reasonable efforts to avoid any negative impacts taking place;~~
 - ~~b. The management response to any negative impacts that occur is prompt and appropriate;~~
 - ~~c. The overall management plan for the certified FMU takes full account of the likely impacts, including any necessary implications for budgeting, health and safety, adjustments to annual allowable cut for the FMU as a whole, etc.;~~~~

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- ~~d. The area affected by the uncontrolled factors is a very limited proportion of the Forest Management Unit (FMU).~~

~~It is allowed to develop more specific Indicators designed to fully implement these criteria at the national level in consultation with national stakeholders, and with the support of the FSC National Initiative in the areas affected. In the absence of nationally agreed indicators the international generic indicators specified in "Management of factors beyond the control of the forest managers" section, below, are applied.~~

- ~~2. Excision of areas from scope of certification: In case there are occasions when it is acceptable to exclude or 'excise' specific areas from the scope of an evaluation without the necessary loss of an FSC certificate for the remaining area, such excision takes place when ETKO ensures that the following criteria are met:~~

- ~~a. The management of the excised area does not prevent compliance with FSC standards in the remaining FMU. Inter alia it is clear that the remaining area constitutes a viable FMU subject to a long term management plan in accordance with FSC Principle 7.~~
- ~~b. The excised area is well defined, naturally delineated or artificially demarcated on the ground, mapped, and is clearly distinguished from the remaining FMU.~~
- ~~c. If management of the excised area remains in the control of the owners or managers of the remaining FMU, the management of the excised areas are verified by ETKO as being 'non controversial', as defined by FSC1. The definition currently proposed by the FSC Board of Directors is that:~~
- ~~i. there is no violation of traditional or civil rights;~~
 - ~~ii. High Conservation Values are maintained and HCV forest is not harvested unless in compliance with the requirements of FSC Principle 9~~
 - ~~iii. there is no harvesting of Endangered Forest areas;~~
 - ~~iv. there is no planting of genetically modified (GM) trees;~~
 - ~~v. there is no illegal harvesting;~~
 - ~~vi. there is no conversion of natural forest to plantations or non forest uses, with the exception of community forest areas where they are part of a community endorsed Land Use Plan.~~
- ~~d. In the case that the applicant is evaluated for a joint forest management and chain of custody certificate, there are systems in place to ensure that wood harvested from the excised area is identified and treated as a 'non FSC-certified' source, for the purpose of chain of custody and labelling.~~
- ~~e. The following requirements for disclosure and reporting apply:~~
- ~~i. The applicant for certification makes a full disclosure of all forest areas over which the applicant has some responsibility, whether as owner (including share or partial ownership), manager, consultant or other responsibility. The disclosure is documented in the certification report by ETKO.~~

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- ~~ii. If any areas are proposed for excision from the scope of the evaluation, the applicant explains the reasons for this, and these reasons is documented by ETKO in the certification report and in the public certification summary.~~
- ~~iii. ETKO is responsible for determining whether the stewardship of the forest lands not covered by the certificate compromises the applicant or certificate holder’s demonstration of a long term commitment to adhere to the FSC P&C (Criterion 1.6), and for evaluating whether this results in a serious failure by the applicant or certificate holder of FSC Principle 1. If ETKO concludes that this does result in a serious failure of Principle 1, then the certificate is not issued, or a condition or corrective action request is specified. If a condition or corrective action request is not complied with, the issued certificate is withdrawn.~~
- ~~iv. ETKO includes the proposal for excision in the stakeholder consultation process for a main evaluation, or additionally and separately in the case of annual surveillance evaluations.~~
- ~~v. When the evaluation does not include all the forest areas in which the applicant is involved, ETKO makes an explicit statement in the certification report and in the public certification summary explaining the special controls that are in place to prevent confusion being generated as to which activities or products are certified, and which are not.~~
- ~~vi. As for all certificates, ETKO ensures that all use by the certificate holder of ETKO name and logo, and the FSC name and Trademarks, are pre-approved by ETKO.~~
- ~~vii. ETKO informs the FSC International Center when a certificate is issued from which land has been excised in compliance with this policy, within 10 days of the date of issue. The FSC International Center maintains an up-to-date list of all such certificates, which are available to the FSC Board of Directors on request.~~

~~3. The following generic indicators and thresholds are applied, in the absence of nationally developed, FSC approved indicators and thresholds:~~

- ~~a. ETKO ensures that the management factors beyond the control of the forest managers are done according to the following:

 - ~~i. Managers make all reasonable efforts to avoid negative impacts taking place. Such efforts includes, as a minimum:

 - ~~1. managers have used all reasonable efforts to prevent the uncontrolled activity from occurring,~~
 - ~~2. a documented analysis of the uncontrolled activity is carried out, including an explicit evaluation of any opportunities for reducing the level of activity and/or its impacts that may be influenced by the forest manager;~~~~~~

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- ~~3. demonstration that the forest manager has undertaken best efforts to reduce the level of activity, and/or its impacts, in accordance with the opportunities previously identified.~~
- ~~ii. Management response to any negative impacts that occur is prompt and appropriate;~~
 - ~~1. The specific negative impacts (ecological, environmental, social, economic) of the uncontrolled activity is analysed and the results of the analysis is documented;~~
 - ~~2. The specific actions to be taken to remedy the negative impacts identified is defined;~~
 - ~~3. The specific actions thus identified is implemented for each affected site within 12 months of the uncontrolled activity being identified;~~
 - ~~4. Affected sites are monitored to evaluate the effect of the remedial actions.~~
- ~~iii. The overall management plan for the certified FMU takes full account of the likely impacts, including any necessary implications for budgeting, health and safety, adjustments to annual allowable cut for the FMU as a whole, etc:~~
 - ~~1. Areas affected by the uncontrolled activity are mapped;~~
 - ~~2. The annual allowable cut on the FMU as a whole takes account of any loss or damage resulting from the uncontrolled activity;~~
 - ~~3. The risk of negative impacts on the health and safety of forest workers are assessed and documented, and actions defined and taken to protect forest workers against any identified risks;~~
 - ~~4. The specific actions to be taken to ameliorate any negative impacts are specified in the management documentation, and shall be implemented as described.~~
- ~~iv. The area affected does not exceed 0.5% of the area of the FMU in any one year, nor affect a total of more than 5% of the area of the FMU;~~
- ~~b. ETKO ensures the excision of areas from scope of certification as following:~~
 - ~~i. The national indicators and thresholds proposed by the National Initiative are supported by the consensus recommendation of the board of the National Initiative, and have the demonstrated broad support of FSC members in the country concerned.~~
 - ~~ii. The set of indicators and thresholds, once approved by the National Initiative, are forwarded to the FSC International Center and evaluated by the Accreditation Business Unit for compliance with the international criteria. If approved, they are attached as an annex to the National Forest Stewardship Standard for the territory concerned.~~
- ~~c. ETKO ensures that the management of factors beyond the control of the forest managers are done according to the following:~~

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- ~~i. the national indicators and thresholds proposed by the National Initiative are supported by the consensus recommendation of the board of the National Initiative, and have the demonstrated broad support of FSC members in the country concerned.~~
- ~~ii. The set of indicators and thresholds, once approved by the National Initiative, are forwarded to the FSC International Center and evaluated by the Accreditation Business Unit for compliance with the international criteria. If approved, they are attached as an annex to the National Forest Stewardship Standard for the territory concerned.~~
- ~~iii. If the National Initiative proposes thresholds for area of impact that exceed those specified in 3.a, above, then a specific justification are provided, to be approved by the FSC Executive Director and to be reported to the FSC Board prior to implementation.~~

20.1 Certification of areas previously excised from the scope of certification

~~If management of the excised area remains in the control of the owners or managers of the remaining FMU, the excised area does not subsequently be certified unless the managers are able to demonstrate that it has been restored to at least the same ecological condition as it was in at the time of its excision and all social problems regarding traditional or civil rights have been resolved.~~

21 Processing FSC Policy for Association Complaints

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

ETKO follows the principles of fair treatment and inclusivity.

ETKO refrains from commenting publicly on the situation and actions being taken by FSC until such time as defined in this procedure.


ETKO signs with the affected stakeholders a Non-Disclosure Agreement (NDA) in relation to any confidential information produced during the investigation and cooperates in the process. ETKO ensures that all entities involved in investigating, evaluating and decision-making are free of conflict of interest.

And if no positive result is obtained at the end of this process, ETKO completes the complaint form on FSC website in English by providing all required information in the form and the issue is transferred to the FSC as a complaint by notifying and providing with substantial information that the associated organization or its affiliated group may be in violation of the FSC Policy for Association.

ETKO accepts mediation or other forms of facilitated dialogue that the FSC may offer in this process. And if accepted by all parties, ETKO fulfils the requirements of the process in such mediation processes and submits relevant evidence upon FSC requests. In this sense, ETKO responds to all correspondence appropriately and in a timely manner.

ETKO complies with any decision taken by the FSC when ETKO did not object within the period given to it. And with this decision, it complies with the conditions set by the FSC, if any.

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ETKO acts in accordance with "Processing FSC Policy for Association Complaints" throughout this process.

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