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GROUP CERTIFICATION – FSC GUIDELINES FOR CERTIFICATION BODIES

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Charles-de-Gaulle-Str. 5
53113 Bonn, Germany
Tel : +49 - 228 - 367 66 28
Fax : +49 - 228 - 367 66 30
policy.standards@fsc.org
www.fsc.org

GROUP CERTIFICATION – FSC GUIDELINES FOR CERTIFICATION BODIES

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The Forest Stewardship Council (FSC) is an independent, not for profit, non-government organisation based in Bonn, Germany.

The mission of the Forest Stewardship Council is to support environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

FSC develops, supports and promotes international, national and regional standards in line with its mission; evaluates, accredits and monitors certification bodies which verify the use of FSC standards; provides training and information; and promotes the use of products that carry the FSC logo.

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Group Certification: FSC Guidelines for Certification Bodies 31 July 1998

Background

The FSC General Assembly in 1996 approved the development of new approaches to certification of small landholdings by establishing a consultative group, and a process involving certification bodies and other FSC Members.

An initial discussion paper was prepared by the FSC Secretariat in September 1996 (FSC doc 5.1.1), and was widely distributed. The paper was subsequently annotated to include all the comments received, and the annotated version was widely circulated. An article introducing the topic and raising the main questions to be answered was published in the January 1997 edition of FSC Notes.

Meanwhile certification bodies issued pilot 'group certificates' in a wide variety of different management and ownership situations, in Costa Rica, Solomon Islands, Sweden, UK and USA. The FSC Secretariat has evaluated their systems and reports.

FSC distributed a draft policy for group certification in January 1998 (draft 1-0). The draft was updated and further circulated in April 1998 (draft 1-1), taking into account comments received.

This new document incorporates all comments received on earlier drafts, and experience to date. Matthew Wenban-Smith has prepared this document, and all earlier drafts, in close collaboration with the Executive Director, and guided by the board of directors.

This document is now FSC policy. Certification bodies have twelve (12) months in order to ensure that all pilot schemes are in full compliance with these guidelines. The Secretariat will issue Corrective Action Requests whenever discrepancies are noted.

These guidelines will be reviewed and revised by the FSC Secretariat on the basis of further experience. They form part of the FSC Guidelines for Certification Bodies.

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SUMMARY

These guidelines describe FSC's requirements for the evaluation and certification of groups of forest owners or managers under a single certificate - a process referred to as 'group certification.'

The guidelines distinguish between two levels in such a group certification scheme - the 'group' level, and the 'member' level. Responsibilities are divided between these two levels. At the group level, responsibilities are implemented by a 'group entity.' At the member level, responsibilities are implemented by individual group members.

The group entity is the entity that applies for group certification, and holds any group certificate that is issued. The group entity is responsible to the certification body for ensuring that the requirements of the *FSC Principles and Criteria for Forest Stewardship* are met in the forest lands covered by the certificate. The group entity may be an individual (e.g. a 'resource manager'), a cooperative body, an owner association, or other similar legal entity. The group entity is responsible for:

- communications with the certification body and with group members;
- implementing the administrative requirements of the group certification; and
- implementing management and/or monitoring responsibilities at the group level.

The group members are responsible for implementing any requirements of group membership. Members of a group do not hold individual certificates, but so long as they comply with all the requirements of group membership, their forest lands are covered by one forest management certificate under the group certification scheme. Forest products from these lands may be covered by a chain of custody certificate, and may thereafter carry the FSC Logo. Group members are typically the individual forest owners or managers who are responsible for most aspects of operations management and/or decision making.

These guidelines specify the basic requirements that a certification body must meet in order to evaluate groups and issue group certificates (Section 2, 'Guidelines for certification bodies'). They also specify the requirements that the group entity must meet in order to hold a group certificate (Section 3, 'Group entity requirements').

Finally, Section 4 discusses a number of issues that have special significance in group certification, but which must also be considered in other evaluations (Section 4, 'Further Guidelines'). These issues are:

- Sampling of multiple forest areas within a single certificate;
- Long term management; and
- Partial certification of large properties or groups of properties.

These guidelines are aimed primarily at certification bodies. Certification bodies are expected to incorporate these guidelines into their own certification systems. These guidelines may also be used by potential applicants for group certification, as the basis for designing a group scheme that should meet certification body requirements.

SECTION 1 INTRODUCTION

1.1 These guidelines are designed to facilitate the evaluation and certification of a group of forest properties under the stewardship of a single independent legal entity. This is referred to as 'group certification.'

1.2 These guidelines distinguish between a 'group entity', and 'group members.'

1.2.1 The group entity is the entity that applies for group certification, and holds any group certificate that is issued. The group entity is responsible to the certification body for ensuring that the requirements of the *FSC Principles and Criteria for Forest Stewardship* are met in the forest lands covered by the certificate. The group entity may be an individual (e.g. a 'resource manager'), a cooperative body, an owner association, forest management company or individual, or other similar legal entity with management responsibilities.

When a group entity is a membership organisation, such as an association of forest owners, membership of the organisation does not always mean membership of the group certificate. A forest owner or manager may choose not to join, or may be removed from, a group certification scheme, but may remain a member of the organisation.

1.2.2 The group members are the forest owners or managers and are responsible for implementing any requirements of group membership. Members of a group do not hold individual certificates, but so long as they comply with all the requirements of group membership, their forest lands are certified by a single forest management certificate under the group certification scheme. Forest products from these lands may be covered by a chain of custody certificate, and may thereafter carry the FSC Logo.

1.3 Responsibilities are divided between the group entity and the group members. The group entity will always be responsible for the basic administrative requirements of the scheme (see section 3, below), and may also be responsible for some of the forest management requirements. This division is represented graphically in Figure 1, below:

GROUP ENTITY e.g. Cooperative, Association or Management Company	Basic group responsibilities: e.g. Application for group certification; Administration of group certification scheme; Maintenance of group records; Coordination between group members; Internal monitoring of group certification scheme; Communication with certification body.			
	Forest management responsibilities undertaken at group level: e.g. Group forest policy documentation; Marketing of forest products.			
GROUP MEMBERS e.g. Owner or Manager	MEMBER 1 Member	MEMBER 2 Member	MEMBER 3 Member	MEMBER N Member

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	responsibilities: e.g. Management planning; Planting; Harvesting.	responsibilities: e.g. Management planning; Planting; Harvesting.	responsibilities: e.g. Management planning; Planting; Harvesting.	responsibilities: e.g. Management planning; Planting; Harvesting.
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Figure 1

1.4 The actual division of responsibilities will differ greatly between different group certification schemes. In some schemes the group entity may take on almost all the responsibilities for forest management, including management planning, harvesting, marketing and sales (see figure 2a, below). 'Resource Manager' certification often takes this form. In other cases the group entity will do little more than administer the group certification scheme, with the individual members taking responsibility for all forest management activities (see figure 2b, below). The kind of scheme that is appropriate will depend on local circumstances. The aim of these FSC guidelines is to ensure that all schemes meet certain basic requirements.

Group	Group entity is responsible for the group administrative requirements, and also most of the responsibilities of management including management planning, harvesting, sales and marketing.			
	In contrast, the group members have few management responsibilities.			
Members	1	2	3	N

Figure 2a

Figure 2b

1.5 This division of responsibilities between the group level and the member level is central to group certification. It is reflected in the sampling that is carried out by the certification body, in the structure of the certification report, in the specification of conditions on which certification may be

based, in the issue of 'Corrective Action Requests', and ultimately in the possible withdrawal of the certificate.

- 1.6 The basis of group certification is that the forest area of each member of the group must comply with all the requirements of the *FSC Principles and Criteria of Forest Stewardship*. Administrative and policy requirements of forest stewardship that are relevant to the whole group (e.g. management planning, inventory and monitoring) may be implemented at the 'group' level or by individual group members. Requirements that are implemented in the forest (e.g. maintenance of habitats, streams, species diversity) must be satisfied within each property member on an individual basis, appropriate to the size and complexity of the forest area concerned. Responsibilities for meeting criteria may not be 'traded' between different members or properties, e.g. with one member meeting all conservation objectives whilst another does not meet any.
- 1.7 The next sections of this paper describe FSC's requirements of all group certification schemes. The following section (Section 2) describes guidelines for certification bodies in the design and implementation of a group certification scheme. Section 3 then specifies the requirements that a group entity must meet in order to be certified under such a scheme. Section 4 describes further guidelines for certification bodies that apply to all certification evaluations, but are perhaps especially relevant in group certification.
- 1.8 In order to be accredited by FSC, certification bodies' group certification systems must implement the requirements of all three sections.

SECTION 2 GUIDELINES FOR CERTIFICATION BODIES

- 2.1 The certification body shall develop and document special procedures regarding the evaluation, certification and monitoring of group entities. Such documentation:
 - 2.1.1 shall be available as a single document;
 - 2.1.2 shall demonstrate compliance with all the requirements specified in these guidelines.

Note: *Relevant procedures may also be incorporated into other documents (e.g. Assessors' Manuals, office manuals, etc.). In such case it is acceptable that the single document regarding group certification simply provides references to the relevant requirements specified elsewhere.*
- 2.2 The certification body shall explicitly evaluate compliance of the group entity with the requirements specified in Section 3, below. It is recommended that this evaluation takes place at a pre-evaluation or 'scoping' stage. This will ensure that all the administrative requirements of the group are satisfied, prior to the applicant incurring the costs of field visits. In order for a group certificate to be issued, the group entity must comply with all of the requirements specified in Section 3.
- 2.3 The certification body must define and document the sampling methodology used for group evaluations.
 - 2.3.1 Each group member in the sample chosen for assessment must be evaluated to ensure compliance with all the requirements of the *FSC Principles and Criteria of Forest Stewardship*. Some members may not be selected for evaluation by the certification body, but the members that *are* selected for evaluation must fully meet the *FSC Principles and Criteria of Forest Stewardship*. Administrative and policy requirements of forest

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stewardship that are applicable to the whole group (e.g. management planning, inventory and monitoring) may be implemented at the 'group' level or by individual group members. Requirements that are implemented in the forest (e.g. maintenance of habitats, streams, species diversity) must be implemented by every group member on an individual basis, appropriate to the size and complexity of the forest area concerned. Responsibilities for meeting criteria may not be 'traded' between different members, e.g. with one member meeting all conservation objectives whilst another does not meet any. This is illustrated in figure 3, below, in which the shaded areas show the areas sampled and evaluated.

GROUP ENTITY	Group entity requirements (see paragraph 2.2)			
	Forest Management policies and procedures applicable to all group members (meeting <i>some</i> of the FSC Principles and Criteria for <i>all</i> group members).			
GROUP MEMBERS	MEMBER 1	MEMBER 2	MEMBER 3	MEMBER N
	Forest management responsibilities undertaken within each property, meeting <i>all</i> the FSC Principles and Criteria that are not already met at the group level.	Forest management responsibilities undertaken within each property, meeting <i>all</i> the FSC Principles and Criteria that are not already met at the group level.	Forest management responsibilities undertaken within each property, meeting <i>all</i> the FSC Principles and Criteria that are not already met at the group level.	Forest management responsibilities undertaken within each property, meeting <i>all</i> the FSC Principles and Criteria that are not already met at the group level.

Figure 3

2.3.2 General requirements with respect to sampling of properties are specified in section 4, below. However, FSC emphasises with respect to group certification that membership of a group, of itself, implies no special reduction in the level of sampling required to evaluate forest stewardship. The level of sampling must be determined by the level of uncertainty as the result of the group's internal monitoring procedures, or the homogeneity of the group itself (e.g. a single forest type, a single resource manager, etc.). Such considerations have little impact for groups of diverse properties managed by diverse individuals. FSC does not expect groupings with a high diversity of forest types or management practices to provide significant benefits in terms of reduced requirements for sampling. However, these considerations will have a major impact for groups of relatively uniform properties managed within a uniform framework.

2.3.3 In some examples of group certification the major benefit of the grouping has been to reduce administration and organisational costs, and to share travel costs for an evaluation. In these cases relatively few of the forest management responsibilities have been shared at the group level, and a very high sampling rate has been used, sometimes with every

group member being evaluated and monitored annually (i.e. 100% sampling). This is what FSC would expect in small groups with high diversity.

2.4 The certification body must explicitly define the methodology by which the certification body determines 'failure' of a group evaluation: at the time of initial evaluation, AND at the time of subsequent monitoring. The specification of 'failure' may distinguish between 'group failure' and 'member failure', where:

2.4.1 'group failure' may lead to corrective actions, suspension or withdrawal of the group certificate, and may be caused by:

- a failure to fulfil a 'group entity' responsibility, such as administration, management planning, records, etc.;
- b failure of the group entity to ensure that group members comply with a condition or corrective action issued by the certification body;
- c failure to fulfil group member responsibility(s), sufficient in number, extent and/or consequences to demonstrate that the group entity's responsibility for monitoring or quality control has broken down;

Note: *the number as well as the seriousness of member failures may each contribute to group failure: many minor failures, or few major failures may both suggest a breakdown in the group system for quality control, and may be considered sufficient reason to withdraw a group certificate.*

2.4.2 'member failure' may lead to corrective actions, suspension or expulsion of a group member and may be caused by:

- a failure of an individual FSC Principle at the level of an individual group member.

2.4.3 Where the certification body has developed a system of scoring or weighting of observations in support of the certification decision, such a system must be explicitly adapted to implement the above requirements.

2.5 Certification Reports. In addition to the requirements for reporting specified in Part 3.3 of the *FSC Accreditation Manual*, the report on a group certification shall include the following:

2.5.1 a clear description of the division of responsibilities between the group entity and the group members (see 3.1.2 and 3.2.2, below);

2.5.2 a clear demonstration that any responsibilities for implementation of the *FSC P&C* at the group entity level (e.g. management planning, inventory, monitoring) were complied with;

2.5.3 a clear demonstration, for *each* of the group members evaluated, that each group member complied with all of the requirements of the *FSC P&C*, except those already complied with at the group level (see 2.5.2, above).

2.5.4 an explicit description of the monitoring schedule that will be implemented by the certification body.

Note: *It is recommended that certification reports are structured in a way which reflects the sampling strategy used. One clear way is to follow the structure shown in Figure 3, above, in which a section of the report would demonstrate compliance with the basic group requirements, a section would demonstrate compliance of those elements that apply to all group members and which are implemented at the group level, and further sections would demonstrate compliance with the requirements for the individual group member for each group member sampled, .*

2.6 If a certificate is issued, it will be issued to the group entity, not to the individual members of the group certification scheme. Only one certificate will be issued, though copies may be provided to group members with the authorisation of the certification body. The names of group members may be included on the group certificate if required.

2.7 Monitoring shall conform with the guidelines described in paragraph 4.1 below. In addition:

2.7.1 Monitoring must include an explicit assessment of the effectiveness of any internal control systems implemented by the group entity.

2.7.2 Where the results of the group entity's internal monitoring system are relied on by the certification body for the certification body's monitoring, this must be explicitly stated in the certification report, together with the action taken by the certification body to independently validate the resulting data.

2.7.3 Each forest area that is monitored must be evaluated to ensure compliance with all the requirements of the *FSC Principles and Criteria of Forest Stewardship* (see 2.3.1, above);

2.8 Chain of custody

2.8.1 As for all certifications, a forest management certificate or a joint forest management plus chain of custody certificate may be issued. If a joint certificate is not issued, products from the certified area may not enter into certified chains of custody, and are not eligible to carry the FSC Logo.

2.8.2 In order for a joint certificate to be issued, the certification body must be satisfied with the system for tracking and tracing forest products within the scope of the group forest management certificate (see FSC Accreditation Manual, Part 3.2, section 9).

2.8.3 The scope of a joint certificate issued to the group certificate holder may be limited to the chain of custody of products from certain properties, if this has been agreed to by the group certificate holder and the certification body. In such a case, products from properties not covered by the chain of custody evaluation may not enter into certified chains of custody, and are not eligible to carry the FSC Logo.

2.8.4 If a joint forest plus chain of custody certificate *has* been issued, individual group members may apply for additional individual chain of custody certificates, allowing them to market and label their products independently of the group certificate holder. However if the group certificate is limited to forest management only, then individual group members may not hold their own chain of custody certificates.

Note: *This arrangement is compatible with the current system of forest, chain of custody, or joint certificates. An alternative would have been to allow individual group members to hold their own chain of custody certificates, if required. However this would mean a return to the confusion*

regarding the point at which responsibility for the forest evaluation changes to responsibility for the chain of custody evaluation, and for that reason such a policy was rejected. This position will be re-evaluated in the light of practical experience and comments received.

SECTION 3 GROUP ENTITY REQUIREMENTS

3.1 Authority of the group entity.

- 3.1.1 In order to be eligible to apply for group certification, the group applicant must be an independent legal entity or an individual acting as a legal entity.
- 3.1.2 The group entity's responsibilities, for example with respect to management planning, monitoring, harvesting, quality control, marketing, processing, etc., shall be clearly defined and documented.
- 3.1.3 The group entity shall be contractually responsible to the certification body for ensuring that the *FSC P&C* are fully implemented by all members of the group.
- 3.1.4 The group entity shall be responsible for ensuring that any conditions on which certification is dependent, and any corrective actions issued by the certification body thereafter, are fully implemented.
- 3.1.5 The group entity shall have the authority to remove members from the scope of the group certificate if the requirements of group membership, or any corrective actions issued by the certification body, are not complied with.
- 3.1.6 The group entity shall have sufficient legal and management authority and technical support to implement the responsibilities specified in 3.1.2 - 3.1.5, above.

3.2 Group membership requirements and responsibilities.

- 3.2.1 The group entity must have clear rules regarding eligibility for membership of the group certificate.
- 3.2.2 The group members' management responsibilities, for example with respect to management planning, monitoring, harvesting, quality control, marketing, processing, etc., shall be clearly defined and documented.
- 3.2.3 If new members can join the certified group after a certificate has been awarded, the group entity shall have clear, documented procedures for this. It is recommended that new group members must complete a probationary period or initial inspection before any products from their forest area are eligible to enter into a certified chain of custody, and hence to carry the FSC Logo.

3.3 Informed consent of group members.

- 3.3.1 The group entity must provide each group member with documentation, or access to documentation, specifying the relevant terms and conditions of group membership. The documentation shall include:

- i Access to a copy of the Forest Stewardship Standard to which the group is committed;
- ii Explanation of certification process;
- iii Explanation of certification body's, and FSC's, rights to access to the group members' forests for the purposes of evaluation and monitoring;
- iv Explanation of certification body's, and FSC's requirements with respect to public information;
- v Explanation of any obligations with respect to group membership, such as:
 - a maintenance of information for monitoring purposes;
 - b use of systems for tracking and tracing of forest products;
 - c requirement to conform with conditions or corrective actions issued by the certification body;
 - d any special requirements related to marketing or sales of products covered by the certificate;
 - e other obligations of group membership; and
- vi Explanation of any costs associated with group membership (see para 3.5, below).

Note: *In some groups, it may be sufficient to provide individual members with a summary of these items, provided that full documentation is readily available on request at the group offices.*

3.3.2 A 'consent form' or its equivalent must be signed by each group member or the member's representative who voluntarily wishes to join the certification scheme. The consent form:

- i acknowledges and agrees to the obligations and responsibilities of group membership;
- ii agrees to membership of the scheme for the full period of validity of the group certificate; and
- iii authorises the group entity to apply for certification on the member's behalf.

Note: *If provision of such written documentation and consent is considered inappropriate for any reason, then the reason must be documented, together with an explanation of another means by which the group members have been fully informed as to their obligations as group members, and their consent has been obtained. These means may include meetings and newsletters.*

The group entity, in consultation with the CB, will decide whether consent should be provided by the owner or by the manager. Typically, the form will be signed by a person who is directly responsible for most of the decisions and operations, and can also answer for the activities that he or she does not directly implement. In some cases, the operational manager may be the manager of the group entity.

3.4 Group records.

3.4.1 The group entity shall be responsible for maintaining the following records up to date at all times:

- i List of names and addresses of group members, together with date of entry into group certification scheme;
- ii Maps of all forest areas included in the group certification;
- iii Records demonstrating landownership of group members;
- iv Evidence of consent of all group members, preferably in the form of a signed 'consent form' (see paragraph 3.3.2, above);
- v Relevant documentation and records regarding forest management of each group member (e.g. management plans, summary information regarding silvicultural system, management operations, volume production);
- vi Records demonstrating the implementation of any internal control or monitoring systems (see paragraphs 3.1.2 - 3.1.5, above). Such records shall include records of internal inspections, non-compliance identified in such inspections, actions taken to correct any such non-compliance;
- vii Relevant documentation regarding production and sales; and
- viii The date of leaving of any group members, and an explanation of the reason why the member left the group.

Note: *The amount of data that is maintained centrally by the group entity will vary from case to case. FSC recommends that in order to reduce costs of evaluation by the certification body, and subsequent monitoring by FSC, data be stored centrally wherever possible.*

3.4.2 The same documentation shall be archived for at least 5 years.

3.5 Certification costs

3.5.1 The group entity shall be fully responsible to the certification body for paying all the costs of evaluation and monitoring throughout the period of validity of the certificate. The group entity may divide these costs amongst group members as it deems appropriate (see paragraph 3.3.1.vi, above).

3.5.2 The group entity may not issue sub-licenses for use of the FSC Logo or other FSC Trademarks.

3.6 If a group member joins or leaves either the group or the group certification scheme, the group entity shall inform the certification body within one month.

SECTION 4 FURTHER GUIDELINES

4.1 Sampling of multiple forest areas within a single certificate

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- 4.1.1 Many issues of sampling apply to group certification and to single-owner certificates. Sampling is used not only for groups of forests owned or managed by a single certificate holder, but also for groups of forests owned by many members of a group entity. This section deals with these sampling issues.
- 4.1.2 The following guidelines apply to all evaluations involving multiple forest areas, *in addition* to the general requirements for sampling and monitoring specified in the FSC Statutes Appendix A, section 3, and the relevant sections of the FSC Accreditation Manual, Part 3.2.
- 4.1.3 Certification bodies must specify what they consider to be 'separate forest areas' for the purposes of sampling. Separate forest areas might for example be physically separate forest blocks, separate concession areas, separate ownerships, or a combination of these and other similar divisions.
- 4.1.4 The level of sampling to take place during an initial evaluation must be determined by the certification body, taking into account case-specific conditions.
- 4.1.5 For large populations of group members (e.g. more than 50 members) the evaluation team should concentrate on deciding the number of samples needed to produce a reliable assessment, rather than working with a fixed percentage. The sampling intensity must be set and explained by the certification body. Sequential random sampling systems sufficient to demonstrate compliance with the FSC P&C across the full range of strata in the population are acceptable.
- 4.1.6 For smaller populations (e.g. less than 50 members) sampling should normally ensure that at least one third of separate forest areas are visited by at least one evaluation team member during the initial evaluation. Sampling below this level must be explicitly justified in the evaluation report.
- 4.1.7 Sampling levels must be based on a clearly justified stratification in terms of:
- a. geographic homogeneity (e.g. forest type); *and/or*,
 - b. management homogeneity (e.g. silvicultural system, management system, personnel involved in aspects of management).
- 4.1.8 The level of sampling within each stratum should be determined and clearly justified in the certification report, in terms of:
- a. potential environmental or social impacts of operations within the stratum (operations/sites with a high potential impact must receive a high level of sampling);
 - b. the quality and proven strength of monitoring systems, data and records implemented by the applicant for certification. (Data provided by such an internal monitoring system may supplement site visits by the evaluation team.)
- 4.1.9 Membership of a group certification scheme implies no special reduction in the requirements for sampling and monitoring, based only on group membership. Lower levels

of sampling must be justified by either a reduction in the level of uncertainty as the result of a group's internal monitoring procedures, or the special homogeneity of the group itself (e.g. a single forest type, a single resource manager, etc.). Such considerations have little impact for groups of diverse properties managed by diverse individuals. FSC does not expect such groupings to provide significant benefits in terms of reduced requirements for sampling. However, these considerations will have a major impact for groups of relatively uniform properties managed within a uniform framework.

- 4.1.10 As for all operations, inspections at each separate forest area shall ensure that a sufficient variety of sites and operations (e.g. current harvesting, recent harvesting, recent re-planting or regeneration, older replanting or regeneration, etc.) are visited to provide an adequate factual and observational basis to reach a certification decision.
- 4.1.11 The evaluation team leader should determine the extent to which a team should divide its resources in terms of time and personnel between separate forest sites. The basis for this division and the methods for ensuring consistency in observations must be described in the certification report.
- 4.1.12 The monitoring schedule shall include a rotation that ensures that different forest areas are visited in different years. Monitoring should be stratified, following the same guidelines as apply to initial sampling.
- 4.1.13 Selection of forest areas for monitoring should concentrate on those areas where problems are more, rather than less, likely to occur. In general every property in the group shall be visited by the staff of the group entity or the certification body at least once within the period of the validity of the certificate (normally five years). Proposed deviations from this guideline must be explicitly justified (for example for groups consisting of very many small properties). In such cases monitoring shall include a random element, so that the selection is not predictable in advance.
- 4.1.14 When a certificate covers multiple forest areas, the initial evaluation report must specify a proposed monitoring schedule, which complies with these guidelines. The integrity and strength of any internal group monitoring system may be considered when determining the monitoring schedule to be implemented by the certification body.
- 4.1.15 Monitoring must take place at least annually. Certification bodies are urged to consider more frequent monitoring when the potential environmental or social impacts of management are considered especially far reaching, or when large numbers of separate forest areas are involved.
- 4.1.16 It may be appropriate to vary the sampling numbers according to the different kinds of criteria and indicators being monitored. In complex situations, the techniques of Multiple Criteria Analysis would be helpful. Further work is required, to determine efficiently the monitoring requirement of managers, group entities and certification bodies. The evaluation team may select a certain number of samples for full evaluation, and another set of samples for evaluation of selected elements. If so, the sampling system must be clearly explained and justified.
- 4.1.17 Very small properties: The certification body is permitted to make special allowances for very small properties, provided it is satisfied that the group entity is maintaining the quality required. In these cases, the smallest properties may form a separate stratum for

sampling purposes, with a lower sampling intensity than other strata. The size limits used implementing this policy will be determined with guidance from the FSC national initiative and from any relevant national regulations or laws.

4.2 Long term management

- 4.2.1 A commitment to long-term management is required for all kinds of forest certification, but there are some special issues in relation to group certification. In this section, it is argued that the same levels of commitment and evidence are required for group and single certificates.
- 4.2.2 FSC Criterion 1.6 states '*Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.*' FSC Criterion 2.1 states '*Clear evidence of long-term forest use rights to the land (e.g. land title, customary rights, or lease agreements) shall be demonstrated.*'
- 4.2.3 In all forest management certificates, the certification body has to exercise its judgement as to whether current and past practice is sufficient evidence of long-term commitment. Ultimately, the only sanction the certification body has is to withdraw a certificate if practice fails to meet commitments.
- 4.2.4 The same issue applies to single certificate holders who own/manage multiple forest areas or who sell a part of their land-base during the period of validity of a certificate, and a similar issue applies to concession holders, whose concession responsibilities may be shorter than the silvicultural rotation of the forest areas they manage.
- 4.2.5 In the case of group certificates, the issue is especially apparent since a group member may be expelled from or leave the group whilst the rest of the group continues to meet its commitment. If group member turnover is high over a period of time, then the group as a whole may be failing to demonstrate long-term commitment to adhere to the *FSC Principles and Criteria for Forest Stewardship*.
- 4.2.6 Nevertheless, it is not clear that special requirements are necessary in the case of group certification. An individual small landowner may apply for certification, and has to meet the requirements of FSC Principle 1 in order to receive a certificate. Whilst certified, the landowner can sell certified products. At any time the certificate may be withdrawn, or the landowner may decide not to continue with certification. Where there is a high turnover of short-term certificates in a given region, the same problem identified in paragraph 4.2.5 occurs. However this is a general issue of the implementation of Principle 1, not a special issue of group certification.
- 4.2.7 No special requirements relating to turnover of properties within a group certificate are proposed. The requirements of Principle 1 must be met for the group certificate, either at the level of the group entity, or at the level of each individual group member. Certification bodies may find it useful to specify their own guidelines for ways in which a group entity can meet the requirements of Principle 1. Guidelines could relate to maximum turnover in terms of areas or numbers of properties under the group certification within a given period of time.
- 4.2.8 The group entity must record the turnover of group membership, by keeping records of members joining and leaving the group (see paragraph 3.4.1.i and viii, above). This

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provides the data by which the certification body, and FSC, can monitor whether the long-term commitment to the FSC Principles and Criteria is being met. If it is not being met then a Corrective Action Request would be required, and if not implemented the certificate would be withdrawn. Corrective action could be implemented at the level of the group entity (e.g. by changing the requirements for group membership), or at the level of the individual members (those that did not comply would fail Principle 1, and be expelled from the group).

4.3 Partial certification of large properties, or groups of properties

- 4.3.1 Another issue raised in discussions of group certification is whether the group entity may also manage, own, or be otherwise involved with the management of other forest areas that have not been certified, or do not meet the *FSC Principles and Criteria for Forest Stewardship*. An example would be a professional forester or a forest management company with many clients, some of whom are willing to pay the costs of certification and make the required commitments to the *FSC P&C*, and others who are not.
- 4.3.2 This issue is related to the question of partial certification of large properties. In that case a single owner/manager with a degree of responsibility for the management of many separate forest areas may wish to apply for certification of only a subset of these areas on grounds of cost of evaluation, uncertainty about the benefits, or relative difficulty of meeting the *FSC P&C* on different properties.
- 4.3.3 The following guidelines are proposed both for group certificate holders, and single certificate holders with multiple forest areas.
- a The applicant for certification must make 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 shall be documented in the certification report.
 - b When the evaluation does not include all the forest areas in which the applicant is involved, the applicant must explain the reasons for this, and the reasons must be documented in the certification report.
 - c The certification body shall be responsible for deciding, on the basis of readily available information, whether 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 the certification body concludes that this does result in a serious failure of Principle 1, then a certificate shall not be issued, or a condition or corrective action request shall be specified. If a condition or corrective action request is not complied with, an issued certificate shall be withdrawn.
 - d When the evaluation does not include all the forest areas in which the applicant is involved, the certification body must make an explicit statement in the certification report explaining the special controls that are in place that ensure that there is no risk of confusion being generated as to which activities or products are certified, and which are not.

- e As for all certificates, the certification body must ensure that all use by the certificate holder of the certification body name and logo, and the FSC name and Trademarks, are pre-approved by the certification body.