

	SGS QUALIFOR (Guidance Note)	Doc. Number:	GN COC-2011-04
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EVALUATION OF THE ORGANIZATION'S COMMITMENT TO FSC VALUES AND OCCUPATIONAL HEALTH AND SAFETY IN THE CHAIN OF CUSTODY

1. OBJECTIVE

- 1.1 The aim of this document is to provide the guidance that shall be used by SGS auditors for assessing the certificate holder's commitment to FSC values and occupational health and safety.
- 1.2 However, Certificate Holders and other interested parties can also consult this document in order to learn the procedures used by SGS auditors when assessing these requirements.

2. FOREWORD

- 2.1 FSC's mission is to promote the environmentally appropriate, socially beneficial and economically viable management of the world's forests. It is increasingly recognized that association between FSC and organizations that are involved in unacceptable forest-related activities is harmful to FSC's reputation and ultimately to its ability to deliver on its mission. In order to address this concern, in July 2009 the FSC Board of Directors approved a policy establishing the criteria for the association of third parties with FSC, called "Policy for the Association of Organizations with FSC" (FSC-POL-01-004).
- 2.2 In March 2011, the FSC Board of Directors approved a recommendation from the FSC Policy and Standards Committee that mandated FSC to promptly incorporate the requirements of FSC-POL-01-004 into all relevant system documents (e.g. standards, contracts).
- 2.3 Through the incorporation of these requirements in Chain of Custody certification, FSC expects to improve the overall consistency of the FSC System bringing more confidence to consumers in relation to respect of worker's rights throughout the complete supply chain.

ANNEXES

Annex A	Examples of indicators that CB auditors may use to support the evaluation of the organization's compliance with Clause 1.5 and 1.6 of FSC-STD-40-004 V2-1
Annex B	FSC form for self-declaration regarding FSC-POL-01-004

3. FSC AND/OR QUALIFOR REFERENCE

- 3.1 FSC-PRO-20-001 V1-0 Evaluation of the organization's commitment to FSC values and occupational health and safety in the Chain of Custody,
- 3.2 FSC-POL-01-004 Policy for the Association of Organizations with FSC
- 3.3 FSC-STD-40-004 V2-1 Chain of Custody Certification and
- 3.4 AD55-A COC report template.

4. GUIDANCE

- 4.1 The requirements must be followed by all certificate holders from 01 October 2011 and certificate holders must have been audited against these requirements by 01 October 2012.

4.2 Introduction

- 4.2.1 FSC-STD-40-004 V2-1 (Clause 1.5 and 1.6) introduced new requirements in Chain of Custody (CoC) certification by incorporating the requirements of the 'Policy for the Association of Organizations with FSC' (FSC-POL-01-004) and by requiring certificate holders to demonstrate their commitment to occupational health and safety.
 - 4.2.2 These requirements aim to avoid practices within FSC certified operations that are not in accordance with FSC values. They represent a significant step towards the improvement of the overall consistency of the FSC system, and bring additional confidence to consumers in relation to social aspects throughout the complete supply chain.
 - 4.2.3 In order to achieve this objective, the implementation and evaluation process of these new requirements are divided into two phases:
 - 4.2.4 In the first phase, each organization will be required to demonstrate their commitment by signing a self-declaration (See **Annex B**) stating their commitment to FSC values and by developing and maintaining occupational health and safety procedures for the sites within the scope of the FSC certificate.
 - 4.2.5 Auditors are not required to look for additional evidence to support the organization's compliance with FSC values and occupational health and safety requirements, unless they have witnessed objective evidence of non-conformance while touring the company's facilities during an audit (e.g. child labour, lack of safety equipment, etc.). In such a case the auditor may use the suggested indicators (**Annex A**) to further evaluate the commitment.
 - 4.2.6 Non-conformities identified shall be raised to the organization as Corrective Action Requests (CARs) as applicable.
 - 4.2.7 In the second phase, FSC will further develop detailed auditable requirements based on the example indicators listed in Annex A and based on experience gained and feedback received from stakeholders.
- #### 4.3 Auditor qualification

4.3.1 Lead chain of custody auditors qualified according to FSC-STD-20-001 V3-0 Annex 2 are considered to also be sufficiently qualified to audit Clause 1.5 and 1.6 of FSC-STD-40-004 V2-1.

4.4 Assessment of Clause 1.5: Commitment to FSC values

4.4.1 SGS is responsible for auditing the organization's compliance with Clause 1.5 by verifying the following element:

- **Organization's self-declaration: The organization has signed the FSC self-declaration form (see Annex B).**

4.4.2 The absence of a signed declaration shall be treated as a major non-conformity.

4.4.3 Certificate Holders shall sign the English version of the self-declaration. However, SGS may include a local language translation in addition to the English version.

4.4.4 Only upon request the signed self-declarations shall be sent to FSC. Certificate Holders shall keep the signed self-declarations on file and during the annual audits, SGS will check if they have signed it as evidence of compliance with Clause 1.5.2 of FSC-STD-40-004 V2-1.

4.5 Assessment of Clause 1.6: Occupational Health and Safety

4.5.1 SGS is responsible for auditing the organization's compliance with Clause 1.6 by verifying the following quality management elements:

- **Appointed representative** for occupational health and safety
- **Company procedure(s)** for occupational health and safety
- **Training** of staff on health and safety procedures

Note: The extent of the quality management system documentation and training can differ from one organization to another due to:

- a. The size of organization and type of activities;
- b. The complexity of processes and their interactions;
- c. The competence of personnel.

End of Guidance Note

ANNEX A

Examples of indicators that CB auditors may use to support the evaluation of the organization's compliance with Clause 1.5 and 1.6 of FSC-STD-40-004 V2-1

Illegal logging or the trade in illegal wood of forest products	
Requirement	Example Indicators
Trade in illegal wood or forest products	<ul style="list-style-type: none"> - Existence of laws regarding to wood trade in the country/region (e.g. EU FLEGT regulation, Lacey Act, national wood trade regulations) - Existence of authorities' control. - Evidence of wood purchase records (Purchasing contracts, invoices) - Evidence of payment of royalties or other fees, when applicable - Evidence of timber transportation documents (Copies of transport or sales permits with specification of species and volumes as applicable)
Violation of any of the ILO Core Conventions as defined in the ILO Declaration on Fundamental Principles and Rights at Work	
Requirement	Example Indicators
Freedom of association and right to collective bargaining	<ul style="list-style-type: none"> - Evidence of collective bargaining and negotiations between the organization and its workers or workers associations. - Organization's policies recognizing the workers' rights and freedom of association. - Interview with organization's workers and, when applicable, workers' representatives; - Evidence of third party audits covering this requirement (e.g. SA 8000) - Existence of national legislation and governmental authorities' control. - Existence of a workers association operating within the organization. <p>Note: In countries where legislation and/or interference of the state restrict the freedom of association and right to collective bargaining, as a minimum, the organization shall not forbid its workers to freely elect their own representatives, if they so wish. In this case, the organization may be considered in compliance.</p>

Forced Labour	<ul style="list-style-type: none"> - Employment contracts. - Results of governmental authorities' control and monitoring (e.g. inexistence of forced labour in the country/ region or in the organization's sector). - Interview with organization's workers and contractor's workers operating in the certificate holder facilities and, when applicable, with workers' representatives; - Evidence of third party audits covering this requirement (e.g. SA 8000); - - Existence of national legislation and governmental authorities' control.
Child Labour	<ul style="list-style-type: none"> - Employment contracts. - Results of governmental authorities control and monitoring (e.g. inexistence of child labour in the country/region or in the organization's sector). - Interview with organization's workers and contractor's workers operating in the certificate holder facilities and, when applicable, with workers' representatives; - Evidence of third party audits covering this requirement (e.g. SA 8000); - Existence of national legislation and governmental authorities' control.
Discrimination	<ul style="list-style-type: none"> - Interview with organization's workers and contractor's workers operating in the certificate holder facilities and, when applicable, with workers' representatives. - Evidence of third party audits covering this requirement (e.g. SA 8000). - Existence of national legislation and governmental authorities' control. - Organization's policies and recruitment advertisements providing non-discriminatory opportunities of employment. <p>Note: A predominance of men or women in certain activities does not necessarily imply discrimination. The auditor should assess evidence that the organization does not actively promote or accept discriminatory practises in terms of age, sex, ethnicity and others.</p>

Occupational Health and Safety	
Requirement	Example Indicators
Occupational Health and Safety	<ul style="list-style-type: none">- Existence of national legislation and governmental authorities' control.- Evidence of purchase, delivery and use of protective equipment by workers.- Records of trainings, accidents, guidance materials.- Evidence of programs and staff responsible for occupational health and safety.- Interview with organization's workers and contractor's workers operating in the certificate holder facilities and, when applicable, with workers' representatives.- Evidence of third party audits covering this requirement (e.g. OHSAS 18001).

ANNEX B

FSC form for self-declaration regarding FSC-POL-01-004

S e l f - D e c l a r a t i o n**(Policy for the Association of Organizations with FSC)**

The signing Organization is associated with the Forest Stewardship Council A.C., Oaxaca, Mexico, or one of its subsidiaries or affiliates (hereinafter: FSC) by being either a member of or having a contractual relationship with FSC. Hereby the signing Organization explicitly states that it has read and understood the "Policy for the Association of Organizations with FSC" as published under www.fsc.org. This policy stipulates FSC's position with regards to unacceptable activities by organizations and individuals which already are or would like to be associated with FSC as well as the mechanism for disassociation.

In light of the above, the Organization explicitly agrees currently and in the future, as long as the relationship with FSC exists, not to be directly or indirectly involved in the following unacceptable activities:

- a. Illegal logging or the trade in illegal wood or forest products;
- b. Violation of traditional and human rights in forestry operations;
- c. Destruction of high conservation values in forestry operations;
- d. Significant conversion of forests to plantations or non-forest use;
- e. Introduction of genetically modified organisms in forestry operations;
- f. Violation of any of the ILO Core Conventions as defined in the ILO Declaration on Fundamental Principles and Rights at Work.

London 9/11/2011

City, Date

LEA PINTORES LLP Paul Gill



For the Organization

(Include the full name of the organization and representative, authorized signature and, if applicable, the organization's stamp)