

FSC® PROCEDURE

Participation of external observers in on-site FSC certification audits and / or ASI assessments

FSC-PRO-01-017 V1-1 EN



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**PARTICIPATION OF EXTERNAL OBSERVERS IN ON-SITE FSC CERTIFICATION
AUDITS AND / OR ASI ASSESSMENTS
FSC-PRO-01-017 V1-1 EN**

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

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

INTRODUCTION

Requests to observe FSC certification audits conducted by FSC-accredited certification bodies and/ or assessments conducted by ASI may come from a variety of people, including FSC members, stakeholders, journalists, etc. FSC welcomes this level of interest in the FSC system and recognizes the value of spreading an understanding of FSC's practical work in the field. Therefore, FSC endeavors to meet all reasonable requests while safeguarding the integrity and effective management of audits/ assessments and protecting business confidentiality. Requests may be declined due to any possible conflicts that could jeopardize the objectivity of the whole exercise.

VERSION HISTORY

- V1-0 Initial version; developed in response to GA 2005: Policy Motion # 14; approved 11 May 2009 by the FSC Executive Director (published as Advice Note FSC-ADV-01-007).
- V1-1 Revised by decision of the FSC Executive Director to incorporate comments received from ASI, CBs and stakeholders; transition from an Advice Note to a procedure and recoded to make it a stand-alone element of the FSC Normative Framework.

A Objective

The objective of this procedure is to establish the general principles regarding the participation of external observers in on-site FSC certification audits (hereinafter 'audits') and/ or in ASI accreditation assessments (hereinafter 'assessments'). This is essential for ensuring transparency and learning opportunities while at the same time addressing issues around confidential information, avoiding situations where there may be cases of losses or damages, and other situations that may arise during the audit/assessment.

B Scope

This procedure shall be binding for ASI, FSC accredited certification bodies (incl. their assessment and audit teams), the auditee, and observers participating in audits or assessments.

C Effective and validity dates

Approval date	12 November 2013
Publication date	06 March 2014
Effective date	01 April 2014
Period of validity	Until 31 December 2018 (or until replaced or withdrawn)

D References

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

FSC-STD-01-005 Dispute Resolution System

E Terms and definitions

For the purpose of this procedure, the terms and definitions given in *FSC-STD-01-002 FSC Glossary of Terms*, and the following apply:

Assessment	Process undertaken by ASI to assess the competence of an FSC accredited certification body, based on particular standard(s) and/or other normative documents and for a defined scope of accreditation (adapted from ISO/IEC 17011:2004 (E))
Assessor	Person assigned by ASI to perform, alone or as part of an assessment team, an assessment of a CAB (adapted from ISO/IEC 17011:2004).
Audit	Systematic, independent and documented process conducted by an FSC accredited certification body for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled. This includes main and surveillance audits (adapted from ISO 19011:2002 (E)).
Auditee	The Organization that is being audited. Organizations include companies, corporations, enterprises, firms, charities, associations, and institutions (or some combination of these) as well as private individuals, families or communities. With regards to FSC certification, the auditee is either an applicant for

	certification or a certificate holder.
Auditor	Person with the competence to conduct an audit (adapted from ISO 19011:2002 (E)).
Lead assessor	Assessor who is given the overall responsibility for specified assessment activities (adapted from ISO/IEC 17011:2004 (E)).
Lead auditor	An auditor designated to manage an audit (often also to lead the audit team).
Observer	Person who accompanies the assessment or audit team but does not assess or audit. Observers are recognized as interested parties, but shall respect the code of conduct outlined in this document.

NOTE 1: An observer is not a part of the audit team and shall not influence or interfere with the audit.

NOTE 2 An observer can be from a regulator or other interested party who witnesses the audit.

Verbal forms for the expression of provisions

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

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

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

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

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

1 Request for participation

1.1 External observers shall only be allowed to participate in on-site audits with prior written approval from the auditee and the certification body. Additional approval is required from ASI for participation in ASI assessments.

1.2 The request to participate in an audit/assessment as an observer should be submitted as a written application to the relevant certification body and, if applicable, to ASI at least four (4) weeks prior to the scheduled start of the on-site audit / assessment. The accommodation of late applications is at the discretion of the auditee and the certification body.

NOTE: Participation in the audit may be delayed for twelve (12) months or more depending upon the ability of the auditee, certification body and/or ASI to accommodate the request in the planning and logistics of an upcoming audit/assessment.

1.3 The application shall include:

- a) The applicant's name and contact information (address, phone, email);
- b) The applicant's Organization/Affiliation (if applicable);
- c) The applicant's FSC membership status (No member/ member incl. chamber/ supporter);
- d) A brief description of the applicant's background (profession, expertise, certification experience);
- e) A short explanation of the reason for requesting to observe the audit/assessment;
- f) A statement regarding cost absorption;
- g) A commitment to adhere to this procedure and the Observer Code of Conduct (ref. Annex 1).

NOTE: The applicant may add a CV to the application.

1.4 The certification body shall forward the application to the auditee together with a copy of this procedure and a request for a timely response.

1.5 The auditee shall have the opportunity to reject the application based on substantiated concerns related to the request. The certification body shall evaluate the concerns; unsubstantiated rejections shall not be accepted.

1.6 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;
- c) A track record of audit misconduct;
- d) Evidence of an intended disruption of the audit.

NOTE: That an observer has been publicly critical of the operation in the past shall not be used as grounds for rejection.

1.7 The result of the application shall be communicated to the applicant observer within a timeframe that should not prevent the observer from participating in the audit/assessment. Any rejection of an application, by either the auditee, the certification body or ASI, shall be accompanied by a justification specifying the reason for the objection.

NOTE: as a transparent certification scheme, FSC has a positive attitude towards the participation of observers in audits and assessments and therefore expects certification bodies and auditees to exercise a similar kind of attitude when deciding on applications from observers.

2 Roles and responsibilities of observers

- 2.1 Observers are not part of the audit/ assessment team, though they shall be 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/ assessment team within the scope of the evaluation and unless restricted access is justified by Clause 2.3 below.
- 2.2 Observers shall be allowed to witness the work of audit/ assessment teams in the field in order to contribute to the transparency of the process but shall not interfere with the audit/ assessment.
- 2.3 The auditee may limit the access to sites, documents or other sources of information to observers if classified as confidential or dangerous. This should already be addressed in the opening meeting.
- 2.4 The team leader may exclude the observer from an audit/ assessment for justified reasons, particularly in cases of repeated interference with the audit/ assessment, insult or threat against the audit team or the auditee, or ignorance regarding health and safety instructions.
- 2.5 For the period of the audit, the observer will recuse 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.

3 Confidentiality

- 3.1 A formal Non-Disclosure and Confidentiality Agreement shall be signed between observers and Certification Bodies prior to audits, and with ASI prior to assessments.
- 3.2 On request, a Non-Disclosure and Confidentiality Agreement shall also be signed with the auditee.

4 Expenses

- 4.1 Unless agreed otherwise in advance, observers shall be responsible for their arrangements and costs of travel, lodging, and meals.

5 Liability

- 5.1 The auditee, the certification body, FSC and ASI are not liable for any loss or damage of any sort suffered or incurred by the observer during an audit/ assessment.

6 Complaints

- 6.1 Complaints shall be addressed through the FSC Dispute Resolution System.

Annex 1 Code of conduct for observers on audits/ assessments

Observers shall commit to the following code of conduct:

- a) Observers should ask for a briefing by the team leader responsible for the audit/ assessment prior to or at the beginning of the audit/ assessment;
- b) Observers are encouraged to send any comments to the responsible team leader beforehand, in order to ensure adequate preparation of the team in clarifying any issues regarding conformity with FSC requirements;
- c) Observers may request a copy of the audit report¹, the applicable standard or the audit checklist and agenda in advance;
- d) Observers shall not interfere with the audit/ assessment in any way;
- e) Observers shall always follow the assigned team and shall not perform their own independent evaluation;
- f) Observers may, at the invitation of the assessor, auditor or auditee, ask questions for clarification;
- g) Observers shall avoid placing demands upon the assessor, auditor or auditee;
- h) Observers shall not use cameras or any other electronic recording device during the audit / assessment without prior permission;
- i) Observers shall follow all instructions regarding health and safety during the audit / assessment at all time.

¹ Certification Bodies shall take a case by case decision due to confidentiality aspects.