



**FOREST STEWARDSHIP COUNCIL
UNITED STATES**

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US Forest Service Adaptation of Certification Body Auditing

Draft 1.0

-- For First Public Consultation --

Consultation Period: February 23 - April 22, 2016

Overview

This document provides a draft set of supplementary requirements that Certification Bodies (CBs) would follow when auditing US Forest Service (USFS) lands for FSC certification. These build off the existing CB policies, standards and procedures required for auditing *large-scale and complex operations*, including requirements related to: transparency; the pre-evaluation and evaluation process; the number of auditor days (team days and number of auditors on the team) and composition; auditor qualifications; robust stakeholder consultation; and peer review.

For more information on existing requirements for auditors, please see:

- FSC-STD-20-001 *General requirements for FSC accredited certification bodies*
- FSC-STD-20-007 *Forest management evaluations*
- FSC-STD-20-006 *Stakeholder consultation for forest evaluations*

As a package, the additional US Forest Service requirements for certification include these proposed audit procedures as well as the additional requirements to the FSC US forest management standard. Both are included in this first public consultation. Additional information, along with a comment form, can be found on the FSC US website [hotlinked]. Thank you for participating in this consultation process!

Draft Additional Certification Body Auditing Procedures for US Forest Service lands (*in chronological order as they arise in the audit process*)

1. CB submission of proposal to USFS

- Request that USFS will only accept proposals from CBs that agree to follow the USFS-specific auditing protocols

2. Establishment of audit team

- In accordance with the existing CB accreditation standard, ensure that establishment of the audit team takes into account the special/unique nature of US Forest Service management (in general) and the scale, intensity and risk of the specific National Forest(s) pursuing certification. This includes:
 - Size of team (following the considerations and guidance in the accreditation standard)
 - Audit days (for both pre- and main assessment)
 - Auditor qualifications, with technical competence in USFS laws and regulations, social issues, recreation management, tribal relations, and others as identified.

3. Public notice

- To facilitate meaningful and constructive stakeholder engagement, public outreach and education should be done early in the process. This primarily falls on the US Forest Service (and FSC US). On the part of the CB, the following is being considered:
 - Extended notice to 60 days (from 45 days)
 - Required use of a National Forest-specific stakeholder distribution list (provided by FSC US and USFS)
 - Submission of public note to the Federal Registry

4. Pre-assessment

- Under the existing CB accreditation standard, a pre-assessment would be required for USFS lands, which, among other requirements, includes stakeholder consultation. Additional requirements being considered include:
 - The notice of the pre-assessment and the summary of the findings are made public
 - Stakeholder consultation includes an in-person public meeting (to effectively describe the process and receive input) and a more broadly distributed survey instrument
 - The ability for observers to participate in the field visits (in accordance with FSC requirements for observers)

5. Full evaluation

- Under the existing CB accreditation standard (and the related standard for stakeholder consultation), the requirements for large scale operations include a public notice and consultation with local and national stakeholders (particularly around issues related to Principles 6 and 9). In addition, the following is being considered:
 - Stakeholder consultation includes an in-person public meeting(s), to take place prior to the field visits, and to involve the entire audit team.
 - Opportunities for observers to participate in the field visits.
 - Invitation for Accreditation Service International (ASI - the accreditation body for FSC that oversees the certification bodies) to participate
 - Site visits to restoration sites and other areas emphasized by stakeholders.

6. Audit report

- Under the existing CB accreditation standard, the audit report must have at least 2 peer reviewers with technical knowledge on the forest-related issues. In addition, the following is being considered:
 - Include peer review comments and CB responses in the public summary
 - Release draft findings for public comment
 - Final report is made public

7. Annual audits

- These would generally follow the same requirements as specified in the full evaluation. In addition to the current CB requirement to publicly report NCRs when they are closed, USFS is encouraged on an ongoing basis to report publicly on actions taken to address non-conformances.

8. ASI witness assessment

- Consider requiring that ASI participate in a witness assessment.