

FSC Certification Auditing Procedures Adaptation for US Forest Service Audits

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Overview

This document provides a draft set of supplementary requirements for certification bodies (CBs) to follow when auditing lands managed by the US Forest Service (USFS; National Forest) for possible FSC certification. These supplementary requirements 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.

Reflecting the unique role of the federal forest estate, these supplemental requirements are designed to enhance the transparency and consultative content of the audit process when applied to a National Forest.

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 Forest Service requirements for certification include these proposed audit procedures as well as the supplementary language incorporated into the FSC US Forest Management (FM) Standard.

Terminology: National Forest refers to both the ‘forest management unit’ (FMU) and the ‘forest management entity’ managed by the USDA Forest Service.

Supplementary Certification Body Auditing Procedures for National Forests (*in chronological order as they arise in the audit process*)

1. CB submission of proposal to the National Forest

- The National Forest shall be requested to consider proposals only from CBs that agree to follow these National Forest-specific supplemental auditing procedures.

2. Establishment of audit team

NOTE: The FSC accreditation standard for the performance of CBs takes into account size and complexity of the forest management enterprise pursuing certification when determining size of audit team, auditor days (number of auditors times the number of field audit days) and auditor qualifications.

Supplementary requirements for evaluating National Forests:

- For the full assessment, the audit team shall consist of a minimum of four people, and one each with the following disciplines: forestry, social auditing, biology/ecology, and public lands expertise. The pre-assessment and annual surveillance audit may consist of fewer team members if deemed to be sufficient to meet the requirements of the accreditation standard.

3. Public notice

To facilitate meaningful and constructive stakeholder engagement, the CB shall conduct public outreach and education early in the process. This includes:

- Public notice is required for all audit types (pre-assessment, full evaluation and annual audits)
- Extension of the notice period to 60 days (from 45 days).
- Use of a National Forest-specific stakeholder distribution list (provided by FSC US and National Forest)
- Coordination of submission of public notice, for example, in the Federal Register, the Newspaper of Record, social media, etc. The public notice includes an invitation to stakeholders to suggest field sites for consideration by the audit team when developing the field itinerary.

4. Pre-assessment

NOTE: The FSC accreditation standard for the performance of CBs requires that a pre-assessment be conducted for any FMU over 123,000 acres (50,000 hectares); this means that a pre-assessment is required for most National Forests. Though there may be a few National Forests that are below the threshold, a pre-assessment is required for any National Forest, regardless of size.

The FSC procedure for allowing external observers of an audit (FSC-PRO-01-017 V1-1) applies to any type of FSC audit. Per the FSC procedure, both the certification applicant and the CB must agree to a request to observe an audit; specific grounds for denying a request are provided in the procedure. It is expected that both the Forest Service and the CB conducting a National Forest audit allow external observers, per the terms of the FSC procedure.

Supplementary requirements for National Forests:

- A pre-assessment is required for all National Forests that undergo the certification process.
- Public notice is provided at a minimum of 60 days in advance (in line with the requirements of Section 3, above).
- Stakeholder consultation by the CB includes an in-person public meeting and a broadly distributed survey instrument¹ in order to effectively describe the process and to solicit stakeholder input.
- A public summary of the pre-assessment report (with confidential information removed) is prepared by the CB and made publicly available by the Forest Service. Though FSC rules do not require that either the full pre-assessment report or a summary thereof be made publicly available, it is noted that most public agencies engaging in the certification process are accountable to their own set of requirements regarding release of documents such as a full pre-assessment report. Release of a full pre-assessment report or a public summary by the certification applicant does not violate FSC rules.

5. Full evaluation (including audit report)

NOTE: The existing CB accreditation standard along with the related standard for stakeholder consultation require, for large-scale operations, public notice and consultation with both local and national stakeholders as part of the full evaluation. Additionally, the draft audit report must be submitted to at least two peer reviewers with technical knowledge on issues related to the forest management unit seeking certification.

Supplementary requirements for National Forests:

¹ A survey template will be developed by FSC US, and an instrument such as 'Survey Monkey' can be used to administer it.

- Public notice is provided at a minimum of 60 days in advance (in line with the requirements of Section 3, above)
- Stakeholder consultation includes, at a minimum, one in-person public meeting, to take place prior to the field visits, and to involve the entire audit team.
- Site visits by the audit team include areas that are emphasized in the FSC US Forest Management supplementary requirements for National Forests and that are identified during the public notice and stakeholder consultation.
- Peer reviews (with confidential and sensitive information removed) and CB responses are included in the final public summary report, in the event that a certificate is issued.
- Regardless of whether or not an award of certification is the outcome of the full evaluation process, a public summary of the evaluation report (with confidential information removed) will be prepared by the CB and made publicly available by the National Forest. Though FSC rules do not require that the full audit report be made publicly available, it is noted that most public agencies engaging in the certification process are accountable to their own set of requirements regarding release of documents such as the full audit report. Release of a full evaluation report by the certification applicant does not violate FSC rules.

6. Annual surveillance audits (and audit report), if certification is awarded

Supplementary requirements for National Forests:

- Public notice is provided at a minimum of 60 days in advance (in line with the requirements of Section 3, above).
- Stakeholder consultation includes, at minimum, one in-person public meeting, to take place prior to or during the field component of the audit. At minimum, the FSC lead auditor must participate in the public meeting.
- The final public summary report (with confidential information removed) is made publicly available by the National Forest. As with the full evaluation report (Section 5, above), it is noted that most public agencies engaging in the certification process are accountable to their own set of requirements regarding release of documents such as the annual surveillance audit report. Release of an annual surveillance audit report by the certificate holder does not violate FSC rules.