



Forest Stewardship Council®
FSC® Sweden

FSC's complaints procedure crucial for credibility - A case study in Sweden with proposals for change

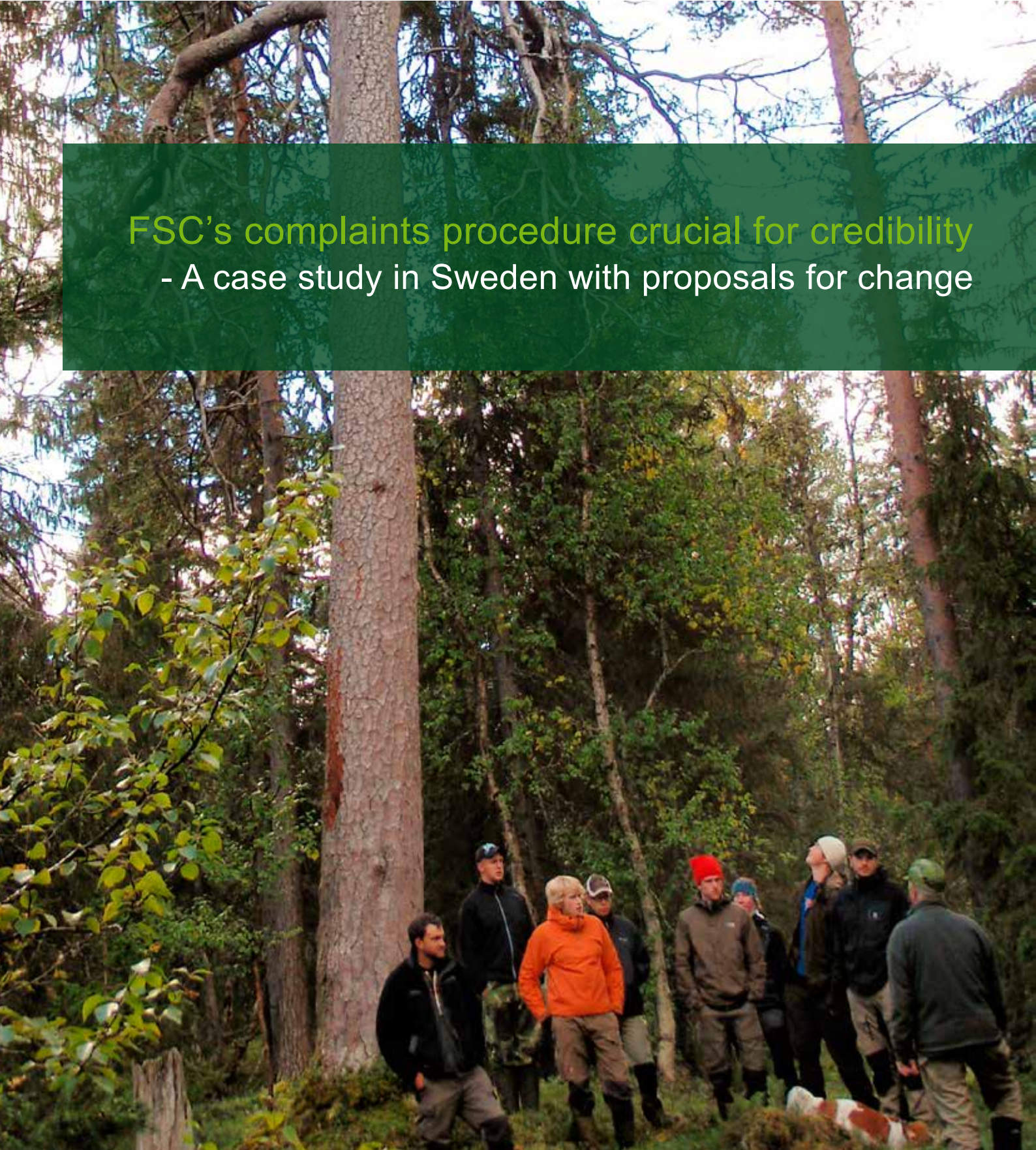


Table of contents

FSC's complaints procedure crucial for credibility - A case study in Sweden with proposals for change

Preface	4
Summary	5
Introduction	6
Complaints	6
Method	7
Case studies of complaints	8
Case 1	8
The complainant's experience [Case 1]	8
The certificate holder's experience [Case 1]	8
The certification body's experience [Case 1]	8
Case 2	9
The complainant's experience [Case 2]	9
The certificate holder's experience [Case 2]	9
The certification body's experience [Case 2]	9
Case 3	10
The complainant's experience [Case 3]	10
The certificate holder's experience [Case 3]	10
The certification body's experience [Case 3]	11
General views of the parties	12
The complainants' general views	12
The certificate holders' general views	12
The certification bodies' views	12
Discussion	13
The complaints procedure takes up considerable resources	13
Different methods of complaints processing by certification bodies	14
Credibility and trust—Lynchpins	15
Complaints procedure and conflict resolution	16
Frustrations	16
Complaints about FSC standards—A complicated patchwork	17
Effects of the complaints procedure	18
Positive effects	18
Risks and negative aspects	18
Measures suggested to improve the FSC complaints process	19
What can the National Office do?	19

What can FSC International do?	19
What can ASI do?	20
What can the certification bodies do?	20
What can the certificate holders do?	20
What can the complainants do?	21
Acknowledgments	22
Figure 1	23
Annex 1: FSC documents about the complaints procedure	24
Annex 2: Glossary	26

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Photo front page: Biodiversity-value tree of Scots pine in northern Sweden.

Photo Henrik von Stedingk / FSC Sweden



Our Vision

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

Our Mission

The Forest Stewardship Council shall promote environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

Preface

More than half of the forests in Sweden are FSC-certified. FSC is based on a democratic dialogue among stakeholders representing social, environmental, and economic interests. Our FSC members decide on the forest-management standard which the certified forest companies are required to follow; this is the foundation of FSC. Equally important is the ability to make complaints. FSC has a unique system in which an individual person or organisation can bring forward a complaint on a certified forest company's activities. In the public-certification reports, it is also possible to monitor the result of the audit of a certified company. The complaints system is also an important tool in the development of the FSC system. Used in the right way, it can improve our system. FSC was established in Sweden 20 years ago. Through our huge certified forest area and active environmental organisations, we have acquired extensive experience in the use of the entire range of FSC's complaints system, from the local to the international level. In this report, you can read how the system works in practice from the perspective of the various actors in complaint cases. The report also contains our recommendations for improvements to the complaints system.

We would like to thank everyone who participated in the interviews and shared their experiences.

Lina Bergström
Director FSC Sweden



Summary

FSC's complaints system is an important link between forestry and its various stakeholders. An effective and fair complaints procedure is important for the credibility of the entire FSC system. For this report, we have investigated how the complaints procedure works in Sweden, highlighted the effects of FSC's complaints system, and put forward proposals for improvements. We followed up on three cases of complaints on forest-management activities from an environmental organisation in the form of interviews with the complainants, certificate holders, and certification bodies.

Our study shows that the complaints procedure works. Complaints are dealt with and the complainants receive a reply. The complaints lead to action being taken by the certificate holders. One force that has led to improvements in the way complaints are handled in recent years has been the increased volume of complaints from environmental organisations. It has led to an increase in experience and produced better procedures. The study also highlights shortcomings in the system, such as a lack of clarity about how the complainant should proceed, ambiguities among the various standards governing the handling of complaints, and the fact that the certification bodies' procedures for handling complaints vary. A positive effect of the complaints procedure is that it gives parties the possibility to influence FSC-certified forestry. The process also has increased the forestry companies' sensitivity to other stakeholders' opinions. Complaints cases also help to keep a check on standards, the practical fulfilment of the standards, and the functioning of the certification system. But the complaints system is associated with high costs for all the parties involved. Moreover, handling complaints can be very time-consuming. There have also been cases of employees in forestry companies who have felt pressure as a result of the complaints.

Further improvements in the handling of complaints can be implemented within the current system. The FSC National Office could help to improve transparency in the complaints procedure. One activity of the National Office is to guide and advise individuals and organisations on how and where to make a complaint.

The revision of the Swedish Forest Management standard could include the type of information certificate holders should present on their Web sites about the complaints system and demonstrate transparency. While this report was in the making, its findings were used for comments to FSC International on the development of the FSC dispute-resolution system.

Coordination by the certification bodies of how complaints are processed could increase clarity. The certificate holders could help by making their procedures more efficient, getting their staff to see complaints as opportunities for development rather than obstacles, and preventing staff from being detrimentally affected in the process. For the complainants, it is important to find out about the process and which possibilities and limitations the complaints procedure offers, so they may have reasonable expectations. The complainants should also refrain from public action until they have received a response and not put extra pressure on the parties involved and thus risk undermining trust. For the complaints system to work, it is necessary that the parties trust each other to a certain degree. If handled appropriately, the complaints procedure may increase trust, but if the system works badly, there is a risk of undermining the public's trust in the entire FSC system.



Introduction

The Forest Stewardship Council (FSC) is a certification scheme for responsible forest management. It means that FSC-certified forest companies operate economically viable forestry taking social and environmental considerations. Stakeholders opinions about FSC-certified forestry can be communicated in dialogue with certificate holders prior to a forestry operation, or in the form of a complaint. The fact that the complaints procedure works is an important factor in the openness that FSC advocates and important for the credibility of the FSC system as a whole (ISEAL Credibility Principles, #11). A simple and transparent complaints procedure could increase commitment among stakeholders and help to ensure that certified companies become more sensitive to the views of the parties concerned. An evaluation of how the complaints procedure works is important

and can provide information about the effects of the procedure and how the complaints processing can be developed. Of the complaints that reached the office of FSC Sweden between 2009 and 2011, 80% concerned indicators under Principle 6, which deals with environmental impact. Two environmental organisations were responsible for 70% of all the complaints. This report is a case study based on interviews and a follow-up to three complaints against FSC-certified forestry operations. One environmental NGO was interviewed as well as representatives from three certificate holders and three certification bodies. The aim was to evaluate the effectiveness of the complaints procedure, describe the effects of FSC's complaints procedure, and provide suggestions for improvement.

Complaints

In this context, a complaint is an expression of dissatisfaction related to activities within the FSC system to which a response is expected (FSC-STD-20-001 V3-0, p. 6; FSC-PRO-01-008 V2-0, p. 6). Complaints may come from individuals or organisations. The complaints procedure within the FSC is governed by various standards and procedures (Appendix 1) and can be divided into various levels, depending on the type of complaint: complaints handled by the certificate holder, by the certification body, by ASI (Accreditation Services International), and by FSC International. There are procedures that describe the handling of complaints (FSC-PRO-01-008 V2-0 and FSC-PRO-01-009 V3-0) at the level of FSC International. A different procedure is used to handle appeals (FSC-PRO-01-005 V3-0), while ASI uses its own complaints procedure (ASI-PRO-20-104). Certification bodies have complaints procedures based on the requirements defined in the accreditation requirements (FSC-STD-20-001). The FSC National Offices do not have any formal role in the complaints system.

As a matter of principle, disputes about a certificate holder's actions (i.e., forestry operations) should be addressed to the certificate holder (FSC-PRO-01-008 V2-0, 1.2). The certificate holder processes and replies to complaints

relating to their activities.

Such a complaint should be answered within a reasonable period of time, but the period is not regulated for certificate holders. In the standard for Control Wood, a time limit of two months is set. Both the certificate holder (FSC-STD-20-007 V3-0, Annex 2m; Swedish FSC Standard for Forest Certification including SLIMF indicators V2-1, 4.4.2, 4.5.2) and the certification body (FSC-STD-2-001 V3-0, 6.1, 10.1k; FSC-STD-20-006 V3-0, 5.1) must have procedures in place to record and handle complaints. If the dispute or complaint cannot be settled by the certificate holder, the complainant may choose to file a complaint with the certification body. Another option is to submit complaints or comments directly to the certification body, but the preferred course of action is to start with the certificate holder.

Within two weeks after receiving a complaint, the certification body shall provide an initial response including an outline on how the complaint will be processed (FSC-STD-20-001 V3-0, 14.2.2). The complainant must be kept informed of the on-going procedure. The certification body has to reply within three months, stating the proposed actions in response to the complaint (FSC-STD-20-001 V3-0, 14.2.2). The certification bodies must provide infor-



mation on their homepage in the local language plus one of the official FSC languages (English or Spanish) on how to proceed with filing a complaint. By request, they are obligated to forward such information as hard copy (FSC-STD-20-001 V3-0, 14.1). Complaints about a certificate holder will be listed systematically in the public summary report, including corresponding follow-up actions and conclusions from the certification body (FSC-STD-2-007aV1-0, Box 2, 3.4; FSC-STD-20-007b V1-0, Box 1, 4.1.3). The public summary report is the certification body's presentation of the annual audit of the certificate holder. When the certification body receives a complaint, it has to determine

whether the complaint indicates non-conformance with a certification requirement and act accordingly. If complainants are not satisfied with the response or actions taken by the certification body, they may choose to send the complaint to ASI, the organisation that accredits the certifying companies. Ultimately, stakeholders may file complaints to FSC International if they are dissatisfied with ASI's handling of their complaint, or if they are dissatisfied with the normative framework of FSC or the performance of FSC International or the FSC network. Complaints that reach the top level are often more related to fundamental issues.

Method

This study is based on interviews with representatives of the various parties in the complaints procedure. The report focuses on complaints submitted to certificate holders or certification bodies concerning the environmental impact on FSC-certified forests. Three complaints were followed up in detail, including three different. This is complemented by the experiences of the complainant, certificate holder, and certification body, respectively, on the basis of the interviews. The certification bodies' Web site was also visited to find information on the complaints procedure. All the complainants, certificate holders, and certification bodies were anonymised. In 2012, the first version of the report was drafted, but the report was left unfinished. Since then, some of the rules were modified and the text was updated accordingly.

Forest facts

Forests cover 70 % of the total land area of Sweden. The productive forest land is 22.5 million hectares. The ownership is 80 % private and 20 % is public. 50 % is owned by 330 000 individual forest owners and 25 % is owned by a few private sector corporations. Half of the productive forest land is FSC certified.

Most of the Swedish forests are part of the boreal zone and the two dominant species Norway spruce and Scots pine make up 80 % of the standing volume, the remaining 20 % is broad-leaved trees. The dominating forestry practice is clear cutting with some tree retention.

Case studies of complaints

Below, we report on the complaint cases studied. A flow chart shows the correspondence between the various parties in the case studies (Figure 1) on page 23 .

Case 1

A Scots pine forest was selected for final felling. The NGO had registered a number of red-listed species and found lots of dead wood while visiting the site prior to the harvesting, so they informed the certificate holder. After the forest was logged, a complaint was sent to the certificate holder concerning non-conformance related to the

1. logging of woodland key habitat (6.2.1b)
2. lack of measures taken to protect known occurrences of red-listed species (6.2.4)
3. retention of dead wood (6.3.4).

In the response, the certificate holder recognised that older dead wood had been affected by machinery, chiefly by soil scarification, but that the debris had not been coarse. The certificate holder judged that the consideration for the dead wood had been sufficient. They found that more groups of living trees should have been retained, but thought that the quantity of dead wood was too little for the area to be classified as a woodland key habitat. As a response to this and other complaints, the certificate holder carried out a training programme introducing new instructions and procedures for their field planners and machine contractors. The complainant sent the complaint on to the certification body. After some correspondence between the certification body and the complainant, the certification body visited the site with an external expert and, later on, with the certificate holder as part of the annual audit. This resulted in two Corrective Action Requests or CARs to the certificate holder concerning the insufficient consideration of dead wood in various stages of decay (6.3.4) and of a logged woodland key habitat (6.2.1b).

THE COMPLAINANT'S EXPERIENCE [CASE 1]

The fact that various complaints for various sites were addressed in one reply was confusing to the complainant. They found it difficult to find out which part of the reply related to which complaint. The complainant found that the reply from

the certificate holder was unclear and unsatisfactory and sent a complaint to the certification body. Then, according to the complainant, things started to get really confusing. They had to send a reminder to the certification body. The complainant was then asked to await the reply from the certificate holder. The complainant had the impression that the certification body did not know which complaint they were replying to. Moreover, the complainant thought the whole process took far too long (15 months; see Figure 1).

THE CERTIFICATE HOLDER'S EXPERIENCE [CASE 1]

The certificate holder had not established procedures for handling comments on planned forestry operations at the time they received the information about the conservation values from the environmental organisation. So the information received on observations of red-listed species was not included in the planning. That would no longer happen since they now have implemented proper procedures. Instead, they would now revisit the area and include that information in the logging planning. Now, in similar situations with observed red-listed species, they usually leave at least 15% of the area intact.

THE CERTIFICATION BODY'S EXPERIENCE [CASE 1]

The certification body found that this case led to an interesting discussion about standards interpretation related to considerations of woody debris created by a previous felling operation. The case also seemed to have caused some misunderstanding on the part of the complainant. The certification body had introduced a system to settle complaints at a basic level, so they wanted to give the certificate holder another opportunity to reply before they would take the process any further. One reason for the delay was that they tried to access the site together with the complainant, but could not decide on a convenient date. The external expert from the Swedish Forestry Agency also withdrew just before a planned site visit, so a university expert was consulted instead.



Case 2

The complainant stated that biodiversity-value trees had been logged at several stands in a Scots pine forest area. They had found fresh stumps with open-fire scars and growth rings of up to 200 years. In the part of the forest that was planned for logging, there were biodiversity-value trees that were not marked. The complainant considered that insufficient attention had been paid to red-listed species and dead wood. The complainant stated that the certificate holder had not complied with the requirement that

1. prohibits the logging of biodiversity-value trees (6.3.18)
2. appropriate measures are taken after reports in the audit of the previous year (6.3.20).

The on-going logging operation was suspended so the complainant and certificate holder could visit the site together. The certificate holder noted in the reply to the complainant that trees with fire scars had been felled. This was subsequently taken up with the contractors who had done the felling. Logs with and without fire scars were taken from the piles of cut wood and returned to the cleared site as dead wood, to make up for the harvested biodiversity-value trees. About 10 hectares of immediately adjacent areas were incorporated in the ecological landscape planning as a voluntary set-aside (6.4). The complainant submitted three complaints to the certification body, one for each felling area. They referred to two more possible non-conformities concerning logged woodland key habitats (6.2.1b) and insufficient retention of dead wood (6.3.4). The certification body, after consulting with the Swedish Forest Agency, reported that no woodland key habitat had been logged and that the consideration for dead wood had been sufficient. The certification body regarded the felled biodiversity-value trees were an exception. In so doing, they referred to their random sampling during the surveillance audit and the internal records from the certificate holder. The certification body concluded that the certificate holder had taken sufficient action after a previous Corrective Action Request (CAR). Therefore, no new CAR was issued in this case.

THE COMPLAINANT'S EXPERIENCE [CASE 2]

The complainant found that the certificate holder had dealt with communication in an exemplary fashion, but was not satisfied with the content of the reply. The complainant was dissatisfied with the fact that the certificate holder had com-

bined several felling operations in a single reply. Therefore, the complaint had been forwarded to the certification body as three separate complaints, one for each felling operation. The complainant was not satisfied with the reply from the certification body and felt that the certification body had underestimated the certificate holder's mistakes. The complainant had experienced that the certification body had ceased replying by email or telephone after this case. Instead, they were referred to the international head office of the certification body, which they felt was unnecessarily complicated. The complainant was considering making a complaint to the accreditation body, ASI.

THE CERTIFICATE HOLDER'S EXPERIENCE [CASE 2]

The complaint was handled in accordance with the procedures recently developed by the certificate holder. The certificate holder agreed that they had made mistakes with regard to the felling of biodiversity-value trees. They had tried to rectify this as best they could by replacing the biodiversity-value trees on the harvested site with dead wood and by discussing the incident with the contractors. The certificate holder considered the case to be an isolated incident that was not representative of the huge annual volume of felling. They felt that they had taken sufficient action, but that the improvements had been overlooked. Instead, they had resorted to making the old mistakes again and they had been dragged up once more. They thought that the purpose of a complaint should be to make suggestions for improvements in future forest operations.

THE CERTIFICATION BODY'S EXPERIENCE [CASE 2]

The complainant submitted three complaints regarding three felling sites where, they found, standards had not been met. All in all, the complaints related to four standard requirements. To determine whether the certificate holder had complied with each requirement of the standard, the certification body found it would be more rational to focus on each indicator rather than respond on a site-by-site basis. The reply was based both on the monitoring of the three sites and on the results of their own randomised site audits. Stakeholders are generally well-aware of the requirements of the standard, but not of how certification works. The fact that the complaint was forwarded to the certification body and was not settled with the certificate holder, even though the certificate holder and the complainant had come to a similar understanding of the felled biodiversity-value trees, was seen by the certification body as a way for the complainant to test whether the certification system had



fulfilled their expectations. To ensure systematic handling, all complaints sent to the certification body were handled by the foreign main office of the certification body.

Case 3

A Norway spruce forest was logged. The complainant found that trees with high conservation value and red-listed species of trees had been logged, and he also commented on soil damage caused by the machinery. Some of the logged forest was considered by the complainant to have conservation qualities similar to an adjacent woodland key habitat. The biodiversity-value trees that, according to the complainant, had been logged included spruce of unusual appearance. They also noted several fresh stumps with more than 190 growth rings. On the day the complainant submitted the complaint to the certificate holder, they issued a press release stating that yet another valuable natural forest had been felled. The complaint contained remarks on

1. non-conformance with the Swedish Forest Act concerning soil damage by forest machinery (1.1)
2. logging of a woodland key habitat (6.2.1b)
3. logging of biodiversity-value trees (6.3.18).

The certificate holder replied that the Swedish Forest Agency determines whether they follow the forestry legislation. The Swedish Forest Agency was consulted and found that the felling was acceptable within the terms of the Swedish Forestry Act. The certificate holder felt that they had taken good environmental care. They were sorry that a few isolated trees valuable for biodiversity reasons had been felled, but felt that it was unreasonable to expect them to identify all biodiversity-value trees. The certificate holder and the Swedish Forest Agency did not find that any woodland key habitat had been logged. After the logging, they noted how difficult it was to assess whether an area had been a woodland key habitat. The complainant sent a fresh complaint to the certification body whereupon they visited the site together with the certificate holder. The certificate holder obtained a CAR for soil damage in wetland areas (indicators 6.5.4 and 6.3.2).

THE COMPLAINANT'S EXPERIENCE [CASE 3]

The complainant was not satisfied with the handling of the complaints. Three months after the complaint was submitted, they had to send a reminder to the certificate holder.

The reply from the certificate holder arrived as an email text, without any indication that it was a formal reply. The complaint had been submitted as a formal letter in an attachment to an email. The complainant also found that parts of the reply had been written in a jocular tone. They were not satisfied with the reply from the certificate holder and forwarded a complaint to the certification body. The complainant quickly received confirmation and a notice of the on-going procedure from the certification body. However, the process did not continue in line with the time-frame. As a result, the complainant did not know when they would obtain a more precise ruling on the issue. Finally, the certification body replied with an ordinary email four months after the complaint had been submitted. The complainant found it strange that the certification body claimed that the felled biodiversity-value trees could not be identified after they had received the coordinates of the stumps with 190 growth rings. The complainant was not content with the way the case was handled and considered taking it to ASI.

THE CERTIFICATE HOLDER'S EXPERIENCE [CASE 3]

Although the formal reply took a long time, the reply had been preceded by several telephone conversations with the complainant. The certificate holder had started to deal with the complaint immediately, but since the complainant had approached the media, the certificate holder had become extra careful with their reply, with several persons involved in order to ensure an accurate and appropriate response. The internal handling of the case actually broke down and the field staff was repeatedly asked to inform other staff about the case. The certificate holder felt that the complaint lacked substance. They regarded the area as easy to assess from a conservation point of view compared to a lot of other felling plans that had required far more complicated conservation assessments. For similar felling operations, the same complainant had previously submitted complaints to the certificate holder and they had not resulted in CARs. At the same time, an additional complaint about another felling operation that had attracted a lot of media attention had been submitted. With two cases with press involvement, the certificate holder was inclined to think that the complaint was part of a plan to draw attention to flaws in the operations of the certificate holder and Swedish forestry in general, and that the individual harvesting operation was not the main focus. The soil damage the complaint referred to concerned main haulage roads cleared of stones. The CARs issued to the certificate holder for soil damage were for driving through a wetland.

THE CERTIFICATION BODY'S EXPERIENCE [CASE 3]

The case was taken up as part of an audit and revealed non-conformance related to soil damage. The certification body pointed out that handling complaints generally takes a long time. This complaint involved correspondence comprising 26 emails, a lot of telephone calls, and efforts to find an external expert. The certification body processes and responds to all complaints that reach them.



A typical managed boreal forest landscape in Sweden, with lakes, mires, forest roads and clear cuts. Note the buffer zones with trees left adjacent to lakes and watercourses as well as tree retention on the clear cuts, dispersed or in groups, requirements from the Swedish Forest Management standard. Photo Henrik von Stedingk / FSC Sweden

General views of the parties

Below, you will find a summary of the general views of the parties involved in the complaints procedure.

The complainants' general views

Submitting a complaint is the only tool a complainant has to influence the forestry company's handling of conservation issues in individual felling operations. However, the complainant found the procedure unnecessarily complicated, unpredictable, and slow. Individual members asked the central office of the NGO to submit their complaints. The instructions from the certification bodies were difficult to understand while the information sheet from the FSC was easier to understand. The unpredictability of the response from the certification bodies to complaints was a big problem for the complainant. Various certification bodies had handled the complaints in very different ways. Also, the complainant felt that some replies were a bit jocular in tone. The replies sometimes dealt with several complaints at once, which was confusing. Sometimes, the complainant needed to send a reminder in order to obtain an answer. The capacity to deal with complaints varied between different certificate holders. Occasionally, the complainant had to spend time explaining the FSC complaints procedure to certificate-holder staff. The complainant could see that the complaints and the FSC certification scheme had resulted in training of forestry staff, new procedures, and the appointment of forestry ecologists. They also applauded one company that they felt had been exemplary in its communication about complaints processing. However, in spite of these efforts they had not seen any great difference in the performance on the ground. They found that woodland key habitats, biodiversity-value trees, and sites with threatened species continued to be harvested.

The certificate holders' general views

According to the certificate holders, the many complaints from environmental organisations had contributed to the development of procedures for handling complaints. The staff had gained experience in handling complaints, which in the longer term had resulted in changes of attitude towards stakeholders' views of their forestry management. There were, however, some ambiguities in the complaints system. This sometimes created uncertainty about who should handle the complaint (the certificate holder or the certifica-

tion body). The certificate holders found it important that the complaint should directly reach the appropriate level for swifter processing. The complaints processing sometimes had a negative influence on the working atmosphere. Field staff tended to take complaints more personally. Complaints that had attracted media attention had caused unpleasantness and stress. Senior staff, on the other hand, were more inclined to seeing complaints as one task among many and thought that the procedures generally worked well. Dealing with complaints had taken up a lot of time: many people and various bodies had to scrutinise the replies before they were sent out. The companies saw a potential for greater efficiency here. Complaints from some environmental organisations had sometimes been seen as being more concerned with ideology than actual facts. These complaints had required a lot of effort and energy.

The certification bodies' views

All the certification bodies emphasised how important the handling of complaints was for an open and transparent FSC system. Each certification body had its own procedure for processing the complaints sent to them, while their audits of the certificate holders' handling of the complaints were done in a similar way. Dealing with complaints had taken up a lot of time and was a costly process, one that involved many persons and a lot of correspondence and telephone calls plus on-site inspections. Also, it could take time to get hold of an independent expert. One certification body felt that the complainants' expectations of the FSC system and the complaints procedure had not always been in line with what the system could provide. Another certification body discussed the challenge for the FSC in trying to communicate what forestry implies to the increasing number of individuals who mainly see the recreational value of the forest, but have little understanding of forestry. Finally, a third certification body had to balance its own random samples in the field audit of the certificate holder with the areas visited in relation to a complaint.



Discussion

This study shows that the FSC complaints system works; the complainant receives a response to their concerns, considerable resources are invested in handling complaints, and routines are changed and training initiatives are implemented. In two of the three cases studied, the complaints led to CARs for the certificate holder. As such, the complaints function as an additional quality control of the certificate holder's operation and complement the work of the certification bodies. The increased volume of complaints from environmental organisations has been an

important driving force in the development of complaints processing within FSC-certified companies and certification bodies in Sweden. The complaints have raised staff's level of experience in complaints processing and have put procedures to test. However, many components of the complaints system still need to be improved. A series of proposals for improvement can be found in a later chapter of this report. Below, you will find some aspects that came up in the interviews.

The complaints procedure takes up considerable resources

The complaints procedure is time-consuming for all the parties involved. In addition to the time spent on emails and telephone calls, the certificate holders and the certification bodies have to log all communications. The complainant documents the case through inventories and photos, writes the reason for the complaint, and waits for a response. The certificate holder and the certification body often need to make site visits for their own follow-up of and with the annual audit.

Good communications and decision-making at the various operating levels of the certificate holder or certification body are required to prepare the response. This may delay the process, but a well-integrated response is crucial for all organisations. It is important for the certificate holder and the certification body to communicate with the complainant about the status of the case, especially if the response is delayed. In several cases, the complainant was not informed about the delay and the progress, which left the complainant unsure about the action being undertaken.

Different methods of complaints processing by certification bodies

The complainant found problematic the unpredictability in the processing of complaints by various certification bodies. The fact that processing methods vary was confirmed in interviews with the certification bodies. Some things that the complainant found confusing were explained using various procedures of the certification bodies. One certification body had replied directly to a complaint that had been made to the certificate holder, but with a cc to the certification body. The certification body explained that, in accordance with the requirements in the accreditation standard, they replied to and processed all the complaints they learned of, regardless of how the complaints had reached them. In another case, the complainant was urged by the certification body to contact the certificate holder again. The complainant found both these situations confusing. The second situation involved a notification that was part of the certification body's policy of trying to settle complaints at the certificate holders' level. Another example was when complaints relating to various harvesting operations were addressed in one reply. According to one certification body, combining several cases was more in line with how they audited. The complainant had expected one reply to each complaint. In one case, the complainant was not happy

about being referred to the international office of the certification body instead of having contact with the local auditor. The certification body had introduced a procedure according to which the complaints were not to be handled locally, but managed by the international office to ensure uniform and effective complaints processing.

The differences in the processing of complaints between certification bodies may not be seen as a problem for a complainant who sends a complaint to one certification body. The differences in the procedures became apparent when the environmental organisation included in this study sent several complaints to various certification bodies. The complainant considered that the differences in complaints processing by the certification bodies had created additional work and could deteriorate the faith in the system. It is apparent that there had been miscommunication between complainants and certification bodies about the complaints process. This could have been avoided either by improving the communication of certification bodies on their procedures or by improving coordination among the certification bodies. For the purpose of communication, it would be better if the certification bodies were well aware of how their procedures differ from other certification bodies.



*Concentration of dead wood in a woodland key habitat. The polypore fungi on page 15 was growing on these logs.
Photo Henrik von Stedingk / FSC Sweden*

Credibility and trust—Lynchpins

Credibility and trust are lynchpins for a socially and environmentally responsible certification system such as FSC. In the complaints procedure, these concepts are central. To generate credibility and trust in the entire FSC system, stakeholders need to feel that they can take part in the FSC process and that their views are taken seriously. However, a non-functioning complaints procedure may erode credibility and trust. The complainant's organisation pointed out that the unpredictability of the certification bodies' handling of complaints contributed to a loss of trust. It was also important that a complaints system be simple and transparent for the stakeholders. One certification body pointed out that the success of the complaints system depended entirely on the complainants having faith in the system and confidence in the parties that make up the system. Without trust, there is a risk that the complainants would not be satisfied regardless of how their complaint were handled. If the certificate holder does not trust the complainant, they tend to only see the complaints processing as additional work. If the certificate holder feels that the complaint is mainly

part of a strategy to influence Swedish forestry at the policy level, then there is a risk that distrust will increase among certificate holders who have to investigate and deal with the complaint.

The attitude towards complaints among the staff is something that the certificate holders need to work on. It may be just an issue in the working environment, but, primarily, the certificate holders need to create an effective and fair system. At the same time, it is essential for all the parties involved in the complaints procedure to be understanding and patient. The complainant also has a responsibility not to undermine trust. One important component of the complainant's responsibility is to refrain from making public statements about an on-going complaint prior to a reply being issued. That would only increase the pressure on the certificate holder and their staff. Such public action also fans the feeling that the complaints procedure is used as a tool to influence political decision-making. That may sap motivation in the handling of the complaint.



*The polypore fungi *Fomitopsis rosea* lives on coarse logs of dead wood in old uneven aged spruce forests. The fungi is listed as near threatened (NT) on the Swedish redlist and used as an indicator for forest continuity and signals a high probability to find other redlisted wood living fungi. It is negatively affected by forestry since forest management leads to a decrease of old and dead trees and changes the microclimate. Photo Henrik von Stedingk / FSC Sweden*



Complaints procedure and conflict resolution

There has been a long-running conflict in Sweden between nature-conservation organisations and forestry companies. It started long before the FSC system was created. The respondents were asked whether the FSC complaints procedure had in any way helped to soften the conflict. The views of those interviewed varied somewhat. Some thought that dialogue had been improved because they focused on an individual incident and that relations had become more professional. When there are procedures to follow, a certain

distance can be kept and matters become less personal. The tone of the handling then becomes more factual, which also improves communication. Some respondents thought that the complaints procedure had just moved the conflict to a new arena. One respondent pointed out that the FSC complaints procedure relies on trust between the parties. If that trust does not exist, the complaints will not really lead to any reconciliation between the parties.

Frustrations

Several parties expressed frustration about parts of the complaints procedure; the fact that the complaints did not lead to anything, that they created extra work, that complaints sometimes created uncomfortably stressful situations for individual staff members or that the complainants did not understand how a standard was established. One source of frustration may have been a lack of procedures or a non-transparent process. Another source of frustration may have been that the complaints procedure actually draws people into situations where they are forced to think differently. This may apply to the complainants, certificate holders, or certification bodies. Frustration can be part of adjusting to FSC's manner of taking the views of the various stakeholders into account. Trust is an important piece of the puzzle in reducing frustration in the system, both trust in the system and trust among the various parties.

It is a challenge to generate reasonable expectations among the various parties about what the complaints system can handle and provide. A more friction-free system with less frustration among the parties requires certain technical changes, plus improved procedures, better information, and clearer processing. But finding ways to achieve the softer values, together with reasonable expectations about the process as well as trust among the parties and the will to understand how other stakeholders think, are just as important in getting the system to work. Such changes take time and are part of a maturation process, both for the system as such and for all the parties involved.

Complaints about FSC standards—A complicated patchwork

At first glance, FSC's complaints process seems to be fairly simple and straightforward. But when one tries to get to the core, it gets more complicated because various standards govern the complaints process.

The overarching FSC document contains a series of principles such as the fact that the complaint should initially be submitted to the certificate holder (FSC-PRO-01-008 V2-0, 1.2) or that the parties involved in a complaints procedure should avoid making public comments on the case until a decision is made (FSC-PRO-01-008 V2-0, 3.6). These overarching principles are only set out in documents that deal with the FSC International level. Therefore, strictly speaking, they do not apply to the parts that the certificate holder and certification body play in the complaints procedure.

The FSC National Offices have no formal role in the complaints system. They can inform about the complaints procedures and guide the complainant. It is stated in the new dispute-resolution system that FSC International shall inform the national office if they have received a complaint

affecting stakeholders in that country (FSC-PRO-01-008 V2-0, 1.4). However, since the national offices are the natural initial contact for national stakeholders, interested parties, and media, they could play a more active role in the complaints system.

The difference between complaints and comments can also be confusing to stakeholders. Complaints are handled using standards and procedures for complaints (FSC-PRO-01-008 V2-0; FSC-STD-20-001 V3-0) while the standard that governs the consultation with stakeholders is applied to comments (FSC-STD-20-006 V3-0, 7.3). Comments are positive or negative opinions put forward; they do not require an answer from the certificate holder or certification body. Nevertheless, a comment will be recorded and evaluated with the following audit of a certificate holder. If the comment indicates that there may be a major non-conformance, the certification body immediately has to initiate an investigation. It is important that the difference between complaints and comments are communicated clearly.



A managed mature Scots pine forest in Northern Sweden. Photo Henrik von Stedingk / FSC Sweden

Effects of the complaints procedure

Positive effects

- **Option to raise concerns.** If there is a concern about the FSC standard, the certification system, or the implementation of the system, there is the option to file a complaint that is guaranteed to be processed.
- **Influence option.** A submitted complaint may lead to action being taken by the certificate holders or certification body.
- **Openness, transparency, and credibility.** This demonstrates that stakeholders' comments are taken seriously in the FSC system.
- **New attitudes.** Complaints have contributed to a broadening of the attitudes among all the parties involved in the system. In turn, the parties have become more open to see the consequences for others. This is a continuing process and part of the development of FSC-certified forestry.
- **Increased professionalism.** The certificate holders and the certification bodies have developed procedures to handle complaints and thus improved their capacity to handle external standpoints.
- **Improved communications.** The complaints procedure helps to formalise current conflicts and gives the conflict parties the possibility to meet and handle individual cases. This had led to improvements in the communication among certificate holders and environmental organisations.
- **Pointing out topics for improvement.** Complaints may point out weaknesses in the system or indicators. They may lead to changes in the FSC system or may be used to revise the national forest-management standard.
- **Testing standard interpretations.** Various parties may interpret the standard differently. The complaints process may highlight and clarify this.

Risks and negative aspects

- **Lack of trust if procedures do not work.** A system that invites stakeholders to hold different views creates expectations. If the complaints procedure does not live up to these expectations, is poorly managed, or unpredictable, the credibility of the entire FSC may be affected.
- **Expensive and time-consuming process.** Complaints processing is an expensive process due to the time invested by the various parties in preparing, investigating, and responding to complaints. Many individuals are involved, site visits have to be made, and each complaint involves a lot of communication.
- **Both parties are seldom right about complaints.** It may be hard for both parties investing time and effort into a complaints case to learn that it is the other party that is deemed to be right.
- **Working environment and stress.** Individual staff members may feel questioned and offended. There is a risk that complaints have a negative effect on their working situation.
- **Using complaints to influence policy.** If the complaints procedure is used to influence political policy issues rather than focus on shortcomings in an individual case, there is a risk that the parties will talk past each other. This makes it harder to find a solution within the current process.

Measures suggested to improve the FSC complaints process

Below, you will find suggestions to improve complaints handling. The suggestions are directed to the various parties in a complaints process. Since some improvements require cooperation among the parties, some topics may come up more than once.

What can the National Office do?

- **National Offices as coordinator.** The national office can take a more specific role in dealing with complaints by coordinating and clarifying the complaints process at the national and international level.
- **National offices as entry point.** Stakeholders who want to submit a complaint can obtain information about the complaints process.
- **Support and service.** Supporting stakeholders directly on how to properly proceed with making a complaint and managing the expectations of stakeholders.
- **Information.** Preparing descriptions of the complaints process and explaining key concepts. Preparing instructions for the complainant on how to proceed and what to expect from the process.
- **Developing portal for complaints.** Administered by the FSC national office, a portal for complaints could increase the transparency and credibility of the system. A portal may include an online tracking system to provide the complainants with information about the process status of their particular complaint. Such a portal may also support the monitoring database.
- **Database creation, monitoring, and follow-up.** A database comprising all complaints may be established. This requires access to the complaints records from certificate holders and certification bodies. Procedures for continuous follow-up of complaints may include surveys sent annually to the complainants. The database may be used to calculate ratios such as proportion of complainants satisfied with the treatment or results, the number of times the complainant has taken the matter further, what action the complaint has led to, whether the response time was acceptable, etc. Customer-satisfaction surveys from other fields may be instructive here.
- **Clarifying requirements of national forest-management standards.** A revision of the national forest-

management standard could include a specification of an obligatory response time for certificate holders, a demand for a contact address, or the type of complaints-related information should be published. To publish information on received complaints would increase transparency and complement the public summary reports that are often seen as inaccessible.

- **Revising national forest-management standards.** Complaints may highlight ambiguities related to forest management that may be improved in a standards revision.
- **Seminars.** Giving seminars on complaints procedure would be a good opportunity to present complaints-monitoring results. All the parties, stakeholders, certificate holders, and certification bodies, should be invited.
- **Highlighting good practices.** Finding opportunities for certificate holders with successful complaints procedures to share their experiences.
- **Training/education.** Giving training to certificate holders in processing complaints and the purpose of the complaints procedure.
- **Dialoguing with certification bodies.** Improving the dialogue with and among certification bodies at the annual certification-body forum and elsewhere.
- **Calibration.** Giving calibration workshops for certification bodies on various topics.

What can FSC International do?

- **Clarifying standards.** Various standards apply to the complaints procedure, which makes it complicated to find out which party is responsible for which part.
- **Clarifying terms.** There are important terms whose meaning tends to be unclear, at least to the public. One such example is the difference between complaints and stakeholder comments.
- **Overriding policy.** An overriding policy for handling complaints that apply at all levels in the FSC system may facilitate the creation of national procedures.
- **Giving a mandate to National Offices to coordinate complaints.** As a matter of course, the complainant turns to the FSC national office in case of a complaint. A clearer mandate of and instructions to the national



offices may improve the functionality of the system.

- **Developing a portal for complaints.** A portal for complaints may increase the clarity of and credibility in the system. A portal may include an online tracking system where the complainants may find information about the process status of their specific complaint. Such a portal may also support the monitoring database.
- **Common guidelines for certification bodies.** There are differences in how complaints are processed by the certification bodies. Clear common standards or guidelines may increase the standardisation of the complaints and publishing processes of the certification bodies.
- **Communicating with National Offices about high-level complaints.** The new dispute-resolution system says that the FSC national offices will be informed if stakeholders in the national office countries are involved in a dispute handled by FSC International.

What can ASI do?

- **Creating equivalent procedures among certification bodies.** The ASI may contribute to creating common guidelines for the certification bodies.
- **Developing a complaints portal.** A portal for complaints may increase the clarity of and credibility in the system. A portal may include an online tracking system where the complainants can obtain information about the process status of their particular complaint. Such a portal may also support the monitoring database.
- **Communicating with National Offices** about complaints concerning actors in the country where the National Office is located.

What can the certification bodies do?

- **Communicating procedures.** Communicating their complaints procedures to the complainant in an accessible way. It is important that the certification body be aware of how their procedures differ from the other certification bodies.
- **Consensus between certification bodies.** Seeking to harmonise complaints processing.
- **Clarifying the effects of complaints in Public Summary Reports.** It should be made clearer how individual complaints relate to non-conformities. This may increase the credibility of the complaints process when

it is public as well as increase clarity when a complaint has contributed to a CAR.

- **Homepage information.** Simplifying the information about the complaints procedure and increasing accessibility, making sure there are instructions in each national language, and having a link to the FSC national office homepage with information about the complaints procedure.
- **Feedback.** Getting better at responding to the complainant and the certificate holder about the complaints processing, especially if the process is delayed.
- **Dialoguing.** Improving the dialogue with and among certification bodies at the annual CB forum and elsewhere, including at the FSC national office.
- **Sharing experiences.** Finding ways of sharing positive experiences relating to the complaints processing among various certification bodies.
- **Contributing to standards development.** Giving feedback to FSC, both internationally and nationally, on ambiguities and gaps in the various standards, both the standards that govern the complaints procedure and the national forest-management standard.
- **Media training.** Understanding that complaints and the outcome of a complaint may have a political impact and may be of interest to the media, preparing staff through media training.
- **Attitude toward complaints.** Working to change the attitude, both internally and vis-à-vis certificate holders, towards complaints, so they are seen as business development rather than as an obstacle.

What can the certificate holders do?

- **Homepage information.** Post clear information for the complainants about how they should act and whom they should contact for comments and complaints.
- **Simplifying procedures.** All certificate holders should develop simple and transparent procedures for complaints processing. It is important that these procedures extend to all levels of the organisation.
- **Feedback.** Making sure that the complainant is informed about the on-going process, especially if the case is delayed.
- **Attitude to complaints.** If the complaints are seen as an obstacle, make sure you have a strategy to change that attitude, so complaints come to be seen as business development. Complaints should not be seen



as personal criticism, but as input from concerned persons that has to be handled seriously.

- **Training staff.** It is important to train all relevant (new) staff members on the complaints system and procedures. It is also important to give media training to all relevant staff members.
- **Contributing to monitoring.** Only the certificate holders have an overview of the complaints filed on their activities. To monitor the complaints, procedures for sharing the information with the FSC national office need to be developed.
- **Communicating actions taken after complaints.** To demonstrate the effect that complaints may have, certificate holders should routinely communicate when they have taken key action as a result of a complaint.
- **Sharing experiences.** Finding ways of sharing positive experiences with complaints processing among various certificate holders.
- **Mitigating negative impact on staff.** Preventing the risk of staff members becoming badly affected by complaints about their activities.

What can the complainants do?

- **Learning about complaints procedure.** Reading available materials and information about the complaints procedure on the relevant homepages (national or international, FSC, or certification bodies).
- **Addressing the appropriate levels.** If the complaint directly reaches the appropriate party (certificate holder, certification body, FSC International, or ASI) and appropriate person, the procedure will be more efficient and quicker.
- **Avoiding public statements in on-going cases.** With on-going complaints cases, the complainant should wait for a reply before making public statements to not risk jeopardising the process. Going public before a reply has been received puts extra pressure on the certificate holder or certification body.
- **Reasonable expectations.** If the expectations surrounding the complaints procedure are too great or involve questions that are outside the scope of the complaints procedure, there is a risk that the complainant will not be satisfied regardless of the processing or reply.
- **Trust.** An important element in the functioning of the complaints procedure is that the various parties in the FSC should trust one another and the system. If the complainant lacks faith in the FSC system, there is a risk that the complainant will not be satisfied regardless of how the complaint is processed.

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A planted young Norway spruce stand.

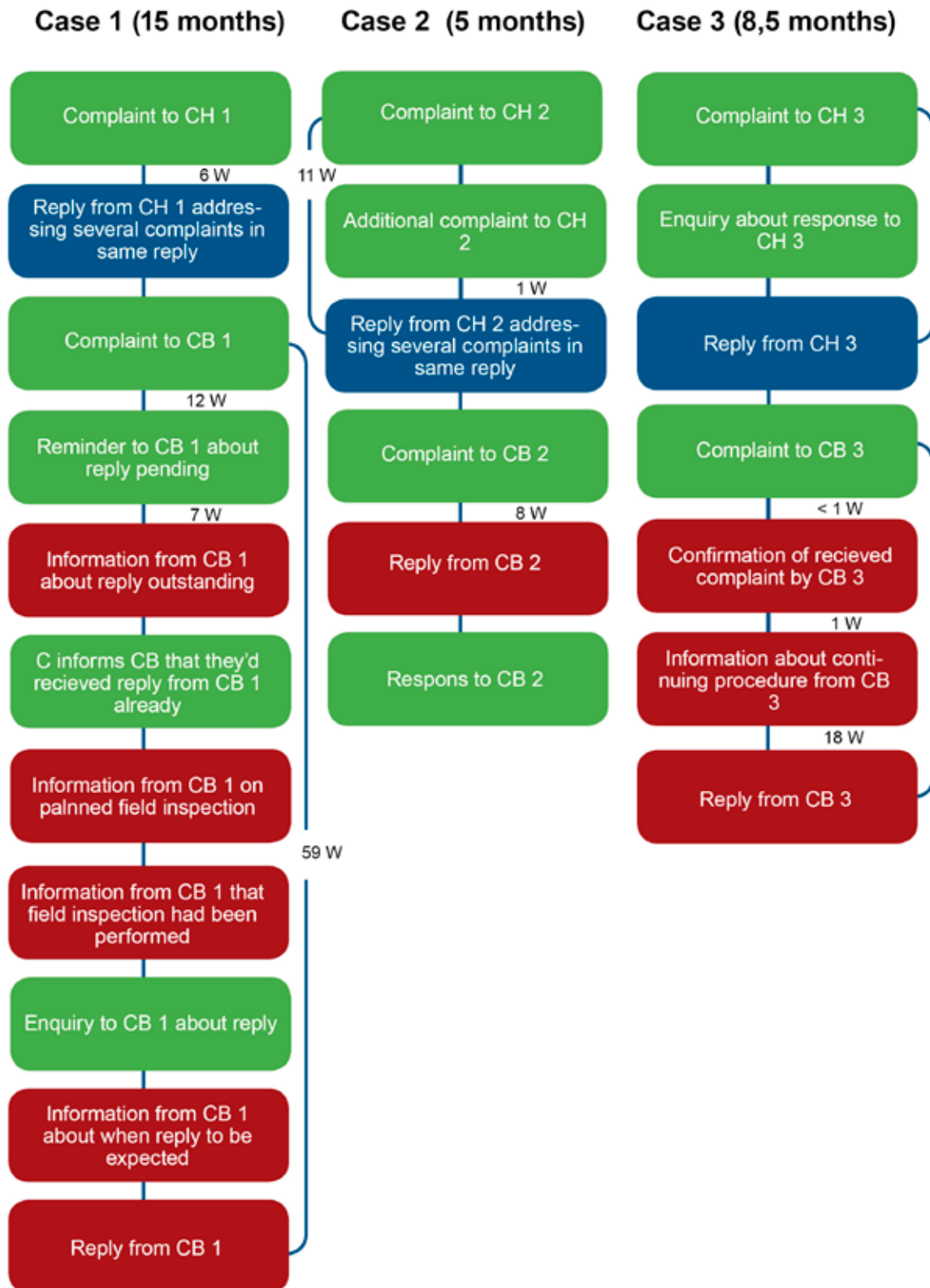


Figure 1. Flow chart showing correspondences between complaints for cases 1, 2, and 3 from the complainant (C, green), certificate holder (CH, blue), and certification body (CB, red). The total time for each case is shown in months, from the submission of the complaint to the certificate holder to the receipt of the reply from the certification body. The time between the submission of the complaint and the reply is shown in weeks (w). Some correspondence and telephone conversations between the parties are not shown in the chart.



Annex 1: FSC documents about the complaints procedure

Name of official document, what it covers, e.g., connection to complaints	Document	Section
<p>Stakeholder Consultation for Forest Evaluations A standard that governs how and what information the certification bodies are to collect from various stakeholders for the auditing of certificate holders with forestry certificates. <i>This governs what information has to be registered, how replies to complaints are to be reported, and when the certification body needs to act on a complaint.</i></p>	FSC-STD-20-006 V3-0	2.6h 2.9 4.1-1 5.1 6.1 6.3, 7.3
<p>General requirements for FSC Accredited Certification Bodies—Application of ISO/IEC Guide 65:1996 A standard that describes FSC’s additional requirements and interpretations of the ISO/IEC Guide 65:1996; a guidance document for certification. <i>This sets out the time requirements for handling replies to complaints and the fact that the certification bodies must have information available about the complaints process.</i></p>	FSC-STD-20-001 V3-0	3.8f 6.1m 8.3 10.1k 14.1-3
<p>Forest Management Evaluations A standard that governs the certification body’s evaluation of certificate holders with forestry certificates. <i>This governs what the certification body should investigate with regard to complaints about the evaluation of the forestry unit.</i></p>	FSC-STD-20-007 V3-0	6.2.1c 6.3.2-3 6.3.7b A 1: 1.2 A2
<p>Forest management evaluations addendum – Forest certification public summary reports A standard for certification bodies that governs what should be contained in the public summary report. <i>This sets out how comments on the certificate holder and the certification body’s observations in relation to complaints should be presented in the public summary report.</i></p>	FSC-STD-20-007a V1-0 FSC-STD-20-007b VI-0	Box 2: 3.4 Box 2: 4.1.3
<p>Swedish FSC Standard for Forest Certification including SLIMF indicators A national standard that governs forest management. <i>This sets out that the forest manager will handle comments and complaints in a systematic manner and seek assistance from a neutral party in case of disputes.</i></p>	V2-010	4.4.2 4.4.5 4.5.2



<p>Processing Complaints in the FSC Certification Scheme</p> <p>A standard that governs how to resolve disputes in the entire FSC system with focus on disputes that affect the FSC in the complaints process.</p> <p><i>This sets out the basic principles for resolving disputes within FSC: that disputes will be addressed by the certificate holder first, how exchanges of information are to take place in dispute resolution, and the importance of a fair process for all parties.</i></p>	FSC-PRO-01-008 V2-0	1
<p>Policy for the Association of Organisations with FSC</p> <p>A policy that describes what the FSC considers acceptable activities for organisations associated with the FSC and mechanisms for exclusion.</p> <p><i>This only applies to the FSC/ASI in the complaints procedure.</i></p>	FSC-POL-01-004 V2-0	4.1 4.2
<p>Processing Policy for Association Complaints in the FSC Certification Scheme</p> <p>A document that describes the processing procedure for the FSC handling complaints against organisations associated with the FSC</p>	FSC-PRO-01-009 V3-0	
<p>Processing Appeals</p> <p>A document that helps to ensure a transparent process in terms of the receipt, evaluation, and decisions on appeals against decisions taken by FSC.</p> <p><i>This only applies to the FSC/ASI level in the complaints procedure.</i></p>	FSC-PRO-01-005 V3-1	
<p>ASI Complaints Procedure</p> <p>A document handling complaints to ASI about ASIs activities, a certification body, or a certificate holder.</p>	ASI-PRO-20-104	
<p>ASI SGS Appeals Panel Report</p> <p>Reply from the appeals panel after the appeal against ASI's review of SGS.</p> <p>This reply emphasises that the certification body should process all the complaints they learn of and deal with them on the basis of an assessment of their degree of seriousness.</p>	V2011-11-27	3.4e

FSC documents can be found at www.fsc.org and ASI documents at www.acreditation-services.com. The Swedish Forest Management standard can be found at www.se.fsc.org and www.fsc.org



Annex 2: Glossary

ASI, Accreditation Services International: organisation that implements the FSC Accreditation Program. This includes approving certification bodies working with FSCs standards.

Audit: evaluation of the performance of an entity in relation to standard requirements. It is a systematic and documented process to obtain records, statements of fact, or other relevant information. It assesses them objectively to determine the extent to which the specified requirements are fulfilled.

Biodiversity-value trees: trees with high biodiversity value such as particularly large or old trees, large trees with a notably wide girth and thick-branched or flat crowns, large or tree-formed deciduous trees in stands dominated by conifers, trees with distinct open-bole fire scars, hollow trees, and trees with stick nests of birds of prey, etc. All biodiversity-value trees shall be retained in any forest operation according to the Swedish Forest Management standard.

Certification: system that is used by a certification body to determine and confirm the conformity of products, services, etc. to applicable standards.

Certification Body (CB): organisation that undertakes evaluations of applicants for the FSC Certification Scheme and audits of certified Forest Management Enterprises and Forest Product Enterprises against FSC standards and Certification Requirements.

Certificate holder (CH): person or entity holding or applying for certification, and therefore responsible for demonstrating compliance with the requirements for FSC certification.

Complainant: person or organisation filing a complaint.

Complaint: expression of dissatisfaction by any person or organisation when a response is expected, presented as a complaint to a certificate holder, a certification body, ASI or FSC International,

Corrective action request (CAR): when the certification body has identified a non-conformity with the standards, they can issue a CAR. This means that the certificate holder will take action to meet the given requirements. Those actions include identification of the cause as well as implementation of effective actions to handle the problems and ensure that they do not occur in the future. There are minor and major CARs. Major CARs shall be corrected within 3

months and minor CARs within 12 months.

FSC National Office (NO): National FSC Network Partner: organisation promoting and representing FSC International in a specific country. The NO develops the National Forest Management standards.

FSC International: international and centralised organisation of FSC including all international units and regional offices.

Machine contractors: entrepreneurs contracted for forest-management operations such as harvesting, skidding, or soil scarification.

Non-conformity: non-fulfilment of a standard requirement.

Observation: area of concern, process, document, or activity that is currently in conformity, but which may result in a non-conformance if no preventive action is taken.

Public summary report: report from the certification body on the audit of certificate holders' forest management. The report is published officially on the FSC website.

Red-listed species: species in a country that are classified as threatened or showing a high rate of decline in recent years. The development of the national red list follows requirements set up by the International Union for Conservation of Nature (IUCN). Species are divided into nine groups, using criteria such as rate of decline, population size, area of geographic distribution, and degree of population and distribution fragmentation.

Stakeholder: any individual or group with an interest or claim that has the potential of being impacted by or having an impact on the activities of the certificate holder.

Woodland Key Habitat (WKH): forest area with high biodiversity values, including structures and habitats important for the survival of rare and threatened species in the forest landscape. All WKHs need to be set aside from commercial harvesting following the requirements of the Swedish Forest Management Standard. According to the Swedish Forest Agency's WKH register, however, many WKHs have not yet been identified or registered.



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