



Sustainable Forestry Initiative® Program

Washington State SFI Implementation Committee

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Inconsistent Practices Investigation Procedures

A process that openly investigates concerns and official complaints is an important component of any legitimate certification program. The transparency requirements of the Sustainable Forestry Initiative® (SFI) 2015-2019 Standard and supporting documents allow individuals and organizations to bring forward questions and concerns. Section 11 of the SFI® 2015-2019 Standard describes the processes for addressing public inquiries and official complaints regarding inconsistent practices.

Part A, Public Inquiries Regarding Inconsistent Practices, shall be used for general inquiries from the public and to promptly review and apply corrective actions, if warranted, in situations where isolated deficiencies in implementing the requirements of the SFI Forest Management, Fiber Sourcing, or Chain-of-Custody standards may have occurred. Inquiries that involve multiple or systemic instances of alleged nonconformity that challenge the validity of a certification shall be addressed using the process outlined in Part B, Official Complaints Questioning the Validity of a Certification.

An official complaint does not challenge the credibility or the content of the Standard requirements, rather it challenges the audit findings and the decision of the certification body to grant the certification, or events occurring since the audit that question the maintenance of the certification. In instances where there is disagreement on the process to be applied, SFI Inc. shall serve as the higher authority in determining which process is most appropriate.

A. Public Inquiries Regarding Inconsistent Practices

Any party with information or claims about a Program Participant's individual practices that may be in nonconformity with SFI 2015-2019 Forest Management or Fiber Sourcing Standards may seek to have those claims investigated in a process that is described here and illustrated in Figure 1.

1. The Complainant shall present specific claim(s) of inconsistent practice(s) in writing and in sufficient detail to the Program Participant.
2. Within 45 days of receipt of the claim of inconsistent practice, the Program Participant shall respond to the Complainant. The Program Participant shall forward a copy of the claim of inconsistent practice and its response to their Certification Body for review. The Certification Body shall investigate the validity of the inconsistent practice and the Program Participant's response and resolution of the claim at the time of the next scheduled surveillance or certification audit.

3. If the Complainant is satisfied with the Program Participant's response then the issue is resolved.
4. A Complainant who believes that the issue has not been satisfactorily resolved may provide its original documentation and the response from the Program Participant to the Washington State Implementation Committee (SIC), which will appoint an Inconsistent Practices Committee (IPC) to conduct an investigation.
5. The IPC shall investigate and respond to the claim of inconsistent practice within 45 days of receipt of documentation. The IPC shall provide copies of its findings and any recommended actions to both the Complainant and Program Participant. The Program Participant shall forward the results of the investigation to its Certification Body.

In the event litigation is involved between the external party and Program Participant, the investigation shall be suspended pending resolution of the litigation. It shall be re-started following resolution of the litigation if SFI nonconformity issues remain.

6. Inconsistent Practices Investigation Guidelines

When the Claimant is unsatisfied with the Participant's response and sends the documentation to the SIC, the IPC shall provide an objective review to determine whether the Program Participant's response was complete and reasonable. The IPC shall conduct an investigation under the following guidelines.

- a. IPC members shall declare whether there is an actual or perceived conflict of interest. In the event that a committee member must be recused, an alternate member will be appointed.
- b. The IPC shall investigate the Program Participant's response by seeking answers to the following questions:
 - 1) Did the Program Participant respond to the Complainant within 45 days?
 - 2) Did the Program Participant forward a copy of the claim and response to their Certification Body?
 - 3) Did the Program Participant engage appropriate agencies when needed?
 - 4) Did the Program Participant provide appropriate documentation? The IPC may need to request supporting documentation from the Program Participant.
 - 5) Did the Program Participant sufficiently address the Complainant's claim?
- c. At the conclusion of the investigation, the SIC Chair will provide the IPC findings and recommendations to the Complainant and Program Participant.

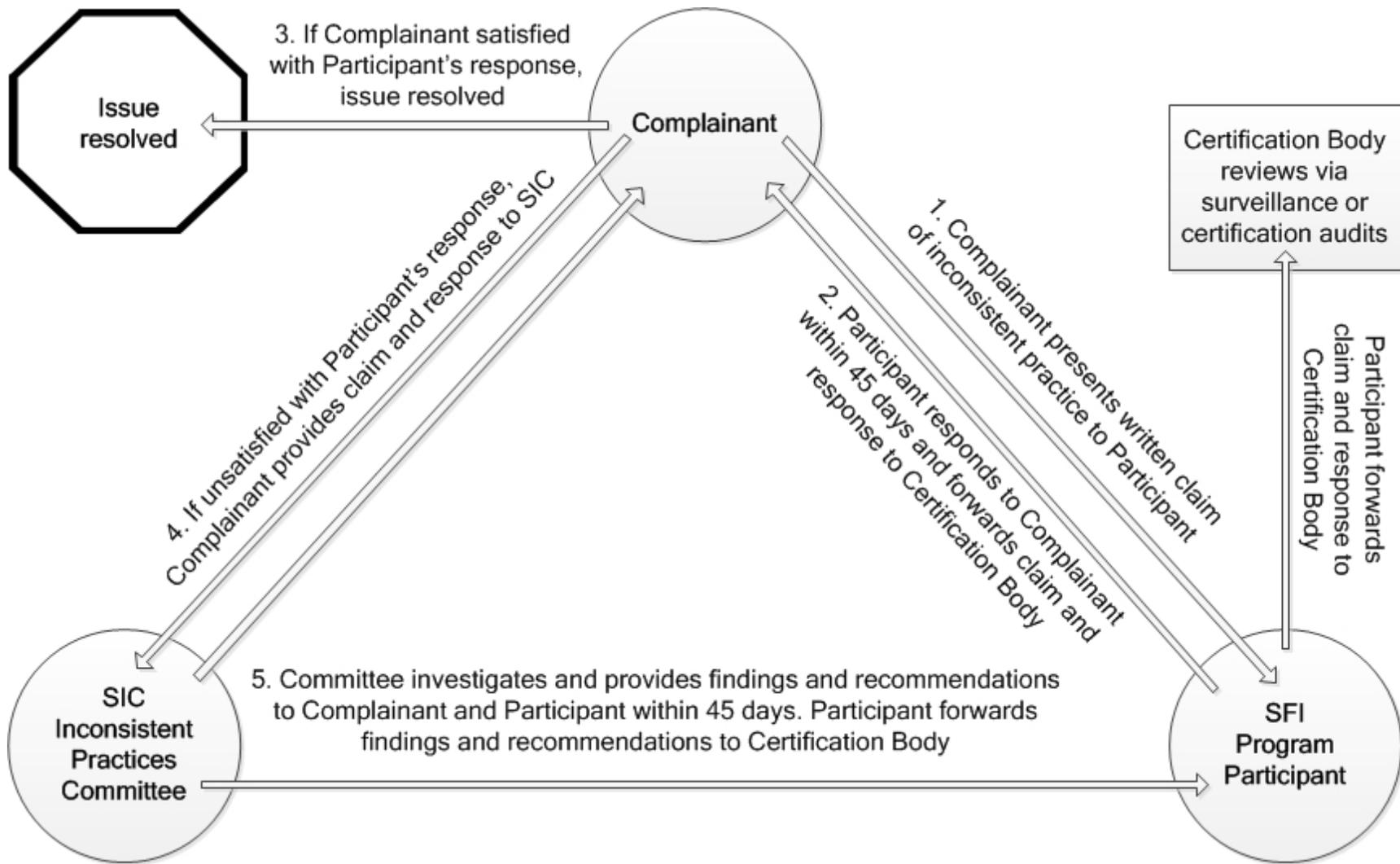


Figure 1. Process for Addressing Public Inquiries Regarding Inconsistent Practices. See text for detailed descriptions of the process.

d. Documentation related to the investigation shall be archived for three years, after which time the documents will be destroyed.

B. Official Complaints Questioning the Validity of a Certification to SFI 2015-2019 Forest Management or Fiber Sourcing Standards

The official complaint process is an important component of any legitimate certification program, including the SFI program. The official complaint process allows individuals or organizations to have their complaint regarding the validity of a certification openly and independently investigated. A complaint does not challenge the credibility or the content of the SFI 2015-2019 Forest Management or Fiber Sourcing Standards, rather it challenges the audit findings and the decision to grant the certification, or events that have happened since the last audit that questions the maintenance of the certification.

1. The complainant outlines their concerns in a letter to the Program Participant's certification body.
2. The certification body may request additional specifics associated with the concerns and will investigate the issue in accordance with their official complaint procedures that were approved by their accreditation body.
3. If the certification body finds a sound basis for the official complaint then it would require the Program Participant to take corrective action to address the complaint and advise the complainant accordingly.
4. If the certification body does not find a sound basis for the complaint and determines the certification was appropriately granted and Program Participant's performance has not changed since the certification, it would inform the complainant of this.
5. If the findings of the certification body do not satisfy the complainant then they can appeal to the accreditation body that accredited the certification body, which is ANSI-ASQ National Accreditation Body (www.anab.org). The accreditation body would then conduct its own investigation into the complaint as the highest authority.
6. In the event litigation is involved between the complainant and the Program Participant, the investigation shall be suspended pending resolution of the litigation. It shall be re-started following resolution of the litigation if SFI nonconformity issues remain.

C. Other Inquiries or Complaints

Section 11 of the SFI 2015-2019 Standard also describes the processes for addressing public inquiries regarding inconsistent practices and the ILO Core Conventions (87, 98, and 111) and challenges or complaints regarding SFI on-product label use (Section 5 of the Standard).