



■ GUIDELINE ■

QUALIFOR COMPLAINTS & APPEALS PROCEDURES

BACKGROUND

The QUALIFOR Programme is the FSC-accredited programme of the SGS Group. SGS is an international company specialising in independent testing, inspection and certification. The Qualifor Programme head office is based at SGS South Africa Pty Ltd. Responsibility for maintaining and controlling the management system lies with this office.

Under the SGS QUALIFOR Programme, the following activities are carried out:

- ❑ Certification of forest management to the FSC standards,
- ❑ Certification of chain of custody for FSC and PEFC certified products.

The SGS QUALIFOR Programme maintains a complaints and appeals process which has the following objectives:

- ❑ To register and address complaints about clients of SGS QUALIFOR (i.e. QUALIFOR forest management and chain of custody certificate holders) from members of the public, i.e. stakeholders;
- ❑ To register and address complaints about SGS QUALIFOR by members of the public;
- ❑ To register complaints and appeals from clients and partners;
- ❑ To ensure that valid complaints and appeals are dealt with timely and appropriately.

IMPORTANT NOTES

- ❑ SGS can only become involved in dealing with complaints and appeals where they relate to the requirements of the SGS forest certification programme.
- ❑ SGS will not respond to anonymous complaints or appeals and all communication must be in writing
- ❑ Full implementation of actions and confirmation of implementation (e.g. correction and closing out of non-compliances that may have been identified as a result of the complaint) are completed in compliance with the requirements specified in FSC-STD-20-002 Structure and content of Forest Stewardship Standards, documented in the SGS Qualifor Management system.

CONTACT DETAILS

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THE COMPLAINTS PROCEDURE

Complaints against the performance of a certificate holder:

Step One: The first objective is to have the cause of the complaint addressed as quickly as possible. For this reason it is best to address the complaint directly to the certificate holder. All operations which have been certified by SGS's QUALIFOR programme, are required to have their own complaints system, for addressing complaints raised by stakeholders. To assist in this process, complaints should be substantiated with objective evidence as far as possible and accurate descriptions of locations, dates and people involved.

Step Two: If you do not receive any response or an inadequate response, send the complaint to the local SGS office and if the contact details of this are not known, send it to the Qualifor Programme Director at SGS South Africa Ltd - address provided on the 1st page.

Proceed to Step Three

Complaints against the performance and/or conduct of SGS staff and sub-contractors

Step One: Address the complaint to the local SGS office and if the contact details of this is not known, send it to the Qualifor Programme Director – address provided on the first page.

Step Two: To assist in this process, complaints must be substantiated with objective evidence as far as possible and accurate descriptions of locations, dates and people involved

Submitting the Complaint to SGS:

Step Three: A complaint must be submitted in writing, signed by the complainant and addressed to the relevant addressee. The note may be short and simple, but must include sufficient documented objective evidence to substantiate the complaint and identifying the basis for the complaint. Dissatisfaction without any justified reason or based on hearsay will not be considered as a complaint and should be rejected.

NOTE: *A complaint shall be considered "valid" only if related to issues under the authority of SGS.*

Processing of the Complaint

Step Four: The complaint will be forwarded to the Qualifor Programme Director.

Step Five: The Qualifor Programme Director will consider the complaint and decide if it is valid and whether it has been adequately addressed by the Certificate Holder. If the complaint is not considered valid, it will be referred back to the complainant explaining the reasons for the decision and requesting any additional information that may further support the validity of the complaint. The complainant is required to respond within 14 days with the required information. If the Programme Director considers that the complaint remains invalid, the complainant will be informed in writing. The notification will include an explanation for the rejection.

Step Six: SGS will confirm receipt of the complaint (within 4 weeks) and provide information on the expected process for dealing with the complaint and where possible, a target date for resolution thereof.

NOTE: *It would be important to understand that whereas SGS will provide as much information as possible, some details relating to the outcome may not be protected by the confidentiality clause in the SGS certification contracts.*

Step Seven: Where the complaint is accepted as valid a competent and impartial person(s) will be appointed to investigate the complaint or the Programme Director may decide to personally conduct the investigation.

NOTE: *Where necessary, contact may also be made with the complainant to determine the full nature and extent of the complaint, and to obtain any additional information.*

NOTE: *The complainant has an obligation to respond to correspondence and enquiries from SGS and failure to do so may lead to the complaint being closed*

NOTE: *The objective is to resolve the complaint within 60 days of receiving same.*

Final Decision

Step Eight: SGS will, subject to the rules of confidentiality, inform the complainant about the results of its investigation and any appropriate actions planned or implemented.

Step Nine: Within 60 days of receiving the final information, the complainant must inform SGS if they remain dissatisfied with the decision by SGS.

Appeal

Step Ten: Where the complainant is dissatisfied with decision by Qualifor, the complaint will be sent to the Advisory Board of the Qualifor programme for a final decision. The Advisory Board, an oversight body, comprises a group of experts entirely independent from any SGS operation.

Step Eleven: The complaint will be lodged at the next meeting of the Advisory Board and the complainant will be informed of this.

Step Twelve: The complainant will be informed of the decision by the Advisory Board, which is the final authority within the SGS procedure.

Step Thirteen: Should the complainant remain dissatisfied with the decision of the Qualifor Advisory Board, they should lodge their complaint to FSC at the address provided on the first page.

THE APPEALS PROCEDURE

What can be appealed?

Adverse decisions by SGS (Qualifor) that may be appealed include:

- refusal to accept an application;
- refusal to proceed with an assessment;
- corrective action requests;
- changes in certification scope;
- decisions to deny, suspend or withdraw certification; and
- any other action that impedes the attainment of certification.

General Notes

- Only a certificate holder can appeal against adverse certification decision.
- The appeal will be investigated and proposed actions specified in response to the appeal within 90 days of receiving same.
- The appeal shall not suspend the validity of the decision which is being appealed, unless otherwise decided by the duly convened Appeals Panel.
- The Programme Director shall ensure that all provisions of this procedure are closely followed without prejudice.
- The office of the Qualifor Programme Director will be responsible for processing all appeals.

Costs

- The cost of evaluating an appeal shall be determined by the Programme Director.
- The Appeals Panel (see below) takes the decision if the appellant has to pay all or a portion of the costs.
- The Appellant will be under obligation to pay the amount due to SGS within ten (10) days after date of the notification of the decision on the appeal.

Submission of the Appeal

Step One: All appeals must comply with the following:

- be submitted in writing whether by letter, facsimile or e-mail. It is the responsibility of the appellant to ensure that the letter of appeal has been successfully transmitted to the Programme Director;
- be submitted within 30 days of the decision the appeal is aimed at;
- signed by the appellant and addressed to the Qualifor Programme Director;
- include sufficient documented objective evidence to substantiate the appeal and identifying the basis thereof
- contain an agreement to pay the costs up to and including the full costs of the appeal process, as determined by the Programme Director and allocated by the Appeals Panel – see above.

Note: Dissatisfaction without any justified reason or based on hearsay will not be considered as an appeal and will be rejected.

Processing of the Appeal by Qualifor

- Step Two:** Receipt of the appeal at the office of the Qualifor Programme Director will be acknowledged within 10 days the appeal's recorded arrival. The acknowledgement shall include a copy of the Qualifor appeals procedure.
- Step Three:** Within ten (10) days of acknowledging receipt, the Programme Director shall decide on the validity of the appeal. If the issue cannot be considered an appeal as per Qualifor definition, the Programme Director shall inform the appellant to agree on other means of solving the issue. If no agreement can be reached, the appeal will be rejected.
- Step Four:** If the appeal does not fully comply with the formal requirements, the appellant will be given 10 days to establish full compliance of the appeal with the formal requirements.

The Appeals Panel

- Step Five:** Within 30 days of validating the appeal, the Programme Director will appoint an Appeals Panel of at least 1 impartial person. For appeals against a decisions to deny, suspend or withdraw a certificate, the Panel will consist of at least 3 impartial persons. The panel may include employees of SGS, but not any member of a certificate holder. The appellant has a right to object to the appointment of any member of the Appeals Panel and the Programme Director has the final decision on the validity of such objection.
- Step Six:** The Appeals Panel shall examine the appeal and report its decision to the Programme Director within 90 days after the appeal had been lodged. The Panel may seek the approval of the Programme Director for an extension of time which may be granted subject to a full explanation of the reasons for the extension of time being supplied to the appellant
- Step Seven:** The Programme Director shall inform the appellant of the decision of the Appeals Panel in writing, no later than ten (10) days after the date of the notification by the Programme Director. This decision will be final.

End