

**Procedure of Forest Certification LLC
for FSC certification audits
during the period of COVID-19**

May 2020

In order to limit the spread of a new coronavirus infection and minimize the negative consequences for the health of its employees and the clients' employees, Forest Certification LLC applies a risk-oriented approach to certification activities. As a source of information on the distribution of COVID-19, we focus on the statistics provided on the website

<https://coronavirus-monitor.ru/>

Certification body risk assessment

High risk

- ✓ Availability of official order of the government to restrict the enterprises activities.
- ✓ The enterprise suspended operations due to Covid-19.

Medium risk

- ✓ Availability of official order of the government to restrict the movement of population between regions and hotel bookings
- ✓ The enterprise introduced restrictions on visiting production sites and offices by unauthorized persons.

Low risk

- ✓ No official order of the government to restrict the movement of population between regions and hotel bookings
- ✓ The enterprise has no restrictions on visiting production sites and offices by unauthorized persons.

Actions of Forest Certification LLC for risk mitigation

High risk

✓ Main audits are not performed.

✓ Surveillance audits:

CoC assessments (including CW) shall be deferred for a period of no more than 6 months, exceeding the maximum period of 15 months from the date of previous audit, but within 2020.

FM/CoC assessments shall be deferred within 2020.

✓ Re-certification audits can not be performed. According to the requirement of cl. 1.4.4 FSC-STD-20-001 v4-0 the specified certificate validity period may be extended for six (6) months in exceptional cases.

Medium risk

Preliminary audits FM/COC	Preliminary audits can be performed remotely. When planning the audit, the auditor shall make sure that the applicant can provide all the information for a full assessment.
Main audits FM/COC	Main audits can not be performed remotely and shall be deferred.
Main audits CoC	Main audits may be performed remotely, subject to the following requirements: <ol style="list-style-type: none"> 1. Prior to the main assessment, information from the applicant shall be collected to conduct a risk assessment in accordance with Annex 1. 2. It is necessary to conduct a risk assessment of each applicant in accordance with the scenarios / factors specified in Annex 1 to determine the possibility of conducting a completely remote audit (low risk), remote audit in 2 stages (medium risk) or on-site audit (high risk). Risk assessment should be conducted at the site level, not at the certificate level. For certificates with multiple sites, a risk assessment should be performed for each participating site (or for each site selected by sampling). 3. If the applicant falls into more than one risk category, a prudent approach and the type of audit of a higher category should be applied.

	<p>4. Medium-risk applicants are subject to verification during a two-stage audit: stage 1 is an initial remote audit, followed by stage 2 (on-site), when the corresponding health risks are reduced and / or travel restrictions are no longer applied or at the first surveillance assessment (see cl. 5 below), whichever comes first. A certificate can be issued upon the successful completion of Stage 1.</p> <p>5. The first surveillance assessment after certification shall be carried out within twelve (12) months after the date of the remote audit. Failure leads to suspension of the certificate.</p> <p>6. Scenarios not described in Annex 1 are considered as “high risk” in accordance with FSC-DER-2020-005.</p>
<p>Surveillance audits COC, FM/COC</p>	<p>When planning surveillance audits, the options below can be applied separately, or both options sequentially, if necessary.</p> <p>1. Surveillance COC audits may be deferred for a period not exceeding six (6) months after the end of the maximum audit cycle for 15 months, but no later than the end of 2020. FM audits can be deferred over a calendar year.</p>

	<p>2. Surveillance COC, FM / COC audits can be carried out remotely, except for the presence of the following factors: a) open major nonconformities, b) availability of outsourcing for certified activities, c) complaints.</p> <p>Surveillance CoC (Multisite, Group***), CoC /CW, FM/CoC audits are performed in two stages:</p> <p>A. Remote (desk) audit (analysis of documentation, interviews of key client personnel and stakeholders).</p> <p>B. Onsite audit (visits to production sites, field inspection of suppliers, field inspection of forest management). If the surveillance audit cannot be carried out in accordance with the requirements of A and B, the certificate shall be suspended.</p> <p>*** - The exception is group certificates of traders.</p>
<p>Re-certification audits COC, FM/COC</p>	<p>If the certificate expires in 2020, it can be extended for up to twelve (12) months, if a surveillance audit has been carried out (which can be carried out remotely in accordance with this derogation).</p> <p>Prior to the expiration of the maximum extension period (12 months), a re-certification audit is carried out to issue a certificate for a new certification cycle.</p>

Audits for changing the scope of COC, FM/COC certificates	Changes to the scope of the certificate shall be made in accordance with the requirements of FSC and the CB's internal procedures. If an onsite audit is required to extend the scope of the certificate, the extension should be deferred until it becomes possible to conduct an onsite audit.
Transfer audits COC, FM/COC	FM: in the case of a certificate transfer, onsite audits cannot be replaced by remote ones. CoC: CoC: in case of certificate transfer for low-risk scenarios (Annex 1), on-site audits can be replaced by remote ones.

Low risk

Full audits are carried out in compliance with the following requirements:

- ✓ Observe personal hygiene.
- ✓ Avoid to engage auditors who require complex logistics to the audit site (preferably from the audit region or neighboring region), taking into account the expert opinion.
- ✓ Coordinate with the client the need to use special protective equipment during the audit.
- ✓ Limit the number of contacts with employees during the audit and give preference to the analysis of electronic documents instead of paper ones.

Desk audit methods

Desk or the first stage of remote audit:

- ✓ The auditor conducts an assessment using audio / video communications tools (skype, zoom, phone etc.).
- ✓ An audit includes assessment of documentation, public sources of information, remote interviews with employees and stakeholders.
- ✓ The auditor should ask the client to demonstrate compliance by video broadcasting from the production site.
- ✓ The auditor keeps evidence of remote auditing on the server in the client's folder (screenshots of the Skype conference or zoom conference; contact, date and time of the phone call; electronic versions of the evaluated documents).

Second stage of remote audit (if necessary):

- ✓ In addition, after a remote (desk) audit an onsite audit is performed, with an emphasis on certification requirements that could not be fully assessed during the remote audit.

**Risk determination for performing COC desk assessments
in accordance with the requirements of FSC-DER-2020-005**

Scenario	Low risk	Medium risk	High risk
Traders	<ul style="list-style-type: none"> • without physical possession • with physical possession but restricted to storage/trading in finished and labelled products 	<ul style="list-style-type: none"> • With physical possession and trading in unfinished/non-labelled products 	

<p>Primary and secondary processors / producers / printing and related services</p>	<ul style="list-style-type: none"> • Exclusively handling certified products made of single input material (e.g., whole site deals with FSC 100%) • All inputs to production are eligible inputs according to Table B in FSC-STD-40-004, and physical segregation is not required 	<ul style="list-style-type: none"> • Use of percentage or credit system with / without multiple product groups 	<ul style="list-style-type: none"> • High complexity with the management and use of all control systems.
--	---	---	---

<p>Non-eligible input material entering the supply chain</p>	<ul style="list-style-type: none"> • Risk mitigated by temporal separation of material 	<ul style="list-style-type: none"> • Risk mitigated by identification of material • Risk mitigated by physical separation of materials, if mitigation can be verified by real time video 	<ul style="list-style-type: none"> • Risk mitigated by physical separation of materials
<p>Contractors/outsourcing activities</p>	<ul style="list-style-type: none"> • Low risk contractors or High risk contractors with low risk categorization as per Clause 9.3 FSC-STD-20-011 	<ul style="list-style-type: none"> • Low risk contractors, but with identified risk of improper additions or mixing by the contractors at the contracting facility 	<ul style="list-style-type: none"> • High risk contractors, as defined in cl. 9.2 FSC-STD-20-011

Sourcing re-claimed materials	<ul style="list-style-type: none">• Supplier audit program performed by another FSC-accredited CB	<ul style="list-style-type: none">• Reclaimed material classification can be demonstrated by means of objective evidence upon receipt.	<ul style="list-style-type: none">• Supplier audit program undertaken by applicant organization and reclaimed material classification through objective evidence not possible.
--------------------------------------	---	--	--

Sourcing CW through implementation DDS as per requirements of FSC-STD-40-005 standard

- Low risk of origin, and
- Low risk of mixing

- Specified risk for origin (mitigation measures do not require field level verification) and
- Low risk of mixing

- Specified risk for origin (mitigation measures require field level verification)
- Specified risk of mixing can only be mitigated by physical separation.

<p>Group and multi-site certification (Central office requirements may be evaluated in the same manner as a single site)</p>	<ul style="list-style-type: none"> • Normal risk participating site *** <p>*** - FSC-STD-20-011 v4-0 cl. 7 and definition «Participating site» in glossary FSC-STD-20-011 v4-0.</p>	<ul style="list-style-type: none"> • High risk participating site* which meets remote audit requirements for reclaimed materials sourcing, CW sourcing and for contractors <p>*** - FSC-STD-20-011 v4-0 cl. 7 and definition «Participating site» in glossary FSC-STD-20-011 v4-0.</p>	<ul style="list-style-type: none"> • High risk participating site *** <p>*** - FSC-STD-20-011 v4-0 cl. 7 and definition «Participating site» in glossary FSC-STD-20-011 v4-0.</p>
<p>Other risk factors</p>		<ul style="list-style-type: none"> • Custom-made products with individual transfer factors • Project certification 	<ul style="list-style-type: none"> • Unresolved complaints / disputes regarding the organization compliance to the FSC standards requirements