

Addressing Allegations of SFI[®] Program Non-Compliance (Inconsistent Practices)

PROCESS

- SFI Implementation Committees (SICs) have primary responsibility for receiving SFI complaints, determining if complaints are frivolous or merit investigation, and ensuring a credible response; actual resolution (if warranted) is the responsibility of the SFI participant.
- Each SIC process must include 5 elements: 1) Respond to SFI-specific complaints, 2) Notify affected parties, 3) Follow-up with complaint registrant, 4) Assure local-level legal review of the process, and 5) Maintain records/limit access to identifying information.
- All complaints received at the national level are referred to the AF&PA SFI SIC Manager for referral to the appropriate SIC.
- Complaints may also be received nationally by the External Review Panel Executive Secretary, through the ERP website; this is intended to provide a confidential firewall before complaints are referred to SICs.
- SICs may refer especially difficult complaints back to AF&PA; AF&PA asks for a response from the SFI participant and communication is at the Vice-President level. If the complaint involves a certified participant, AF&PA may ask the auditing firm to initiate their dispute resolution process.
- If a complaint cannot be resolved to the satisfaction of the SIC, AF&PA, and ERP, complaint facts may be referred to the Sustainable Forestry Board (SFB) with feedback provided back to the SFI participant.
- The SFI participant may appeal to the AF&PA Board of Directors through the AF&PA Forestry Executive Committee. The AF&PA Board may consult with the SFB in designating an expert panel to conduct a field visit. AF&PA Board action may result in suspension or termination of AF&PA membership. SFB action may result in suspension of SFI certification.

RESOLUTION

- AF&PA, the External Review Panel, and the SICs facilitate communications and provide guidance to ensure credible follow-up for all SFI complaints. Corrective actions, if necessary, are the responsibility of SFI participants based upon internal organization policy.
- No resolution is a legitimate outcome: this means that complaints that are not violations of the SFI Standard may not be resolved to the satisfaction of the complaint registrant.
- Compliance is assessed based upon the SFI Standard.

COMMUNICATION AND REPORTING

- SFI participants should be notified of complaints and complaint registrants should be notified of results. The party who receives a complaint should communicate back to the complainant within 45 days and every 30 days thereafter until the complaint is resolved and closed.
- Both SIC and national processes should limit access to identifying information and protect the identity of the SFI participant. At all stages of review, only the level of detail necessary to move the process forward should be provided.
- SICs should provide an annual, aggregate report to AF&PA and AF&PA should provide an annual aggregate report to the External Review Panel.
- SICs should alert AF&PA and AF&PA should alert the External Review Panel to all public, high-profile complaints.
- Accurate record-keeping that includes a well-defined record-retention policy is essential at both the national and local levels.