

**Policy**

**MFCC G1 CBR**

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## **Certification Body Requirements Additional Guidance**

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MYANMAR FOREST CERTIFICATION COMMITTEE



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## Contents

Contents.....	3
1 Background .....	4
1.1 Introduction .....	4
1.2 Scope.....	4
1.3 Normative References .....	4
1.4 Definitions .....	4
2 General Guidance .....	5
2.1 Background.....	5
2.2 Guidance.....	5
2.3 Review .....	5
2.4 Internal Office Order .....	6
2.4.1 Introduction .....	6
2.4.2 Scope and Application.....	6
2.4.3 Audits .....	6
2.4.4 Availability .....	6
3 Document History .....	7

# 1 Background

## 1.1 Introduction

This additional information supplements MTLAS P 2 CBR: Certification Body Requirements.

The aim is to offer further guidance to Certification Bodies when dealing with Non-Conformities and making certification decisions.

## 1.2 Scope

This document provides guidance on the certification decision of the requirements of MTLAS P 2 CBR: Certification Body Requirements. Specifically the guidance relates to decision making with regards.

This policy is applicable to MFCC employees for evaluation and monitoring purposes, and to existing and potential Certification Bodies.

## 1.3 Normative References

MTLAS P 2 CBR: Certification Body Requirements

## 1.4 Definitions

For the purposes of this guidance, the relevant definitions given in MTLAS P 2 CBR: Certification Body Requirements will apply.

In addition:

Internal Office Order	An order (regulation) issued by Myanmar Forest Department or Myanmar Timber Enterprise, in response to and to close a corrective action request.
OHS	Occupational Health and Safety
Retrospective	A past event or situation.
Trial shipments	A series of shipments during the initial phases of MTLAS to audit sawmill and forestry compliance against all MTLAS principles (1 – 6). A critical aspect of the trial shipments is to test the system, and to make subsequent refinements.

## 2 General Guidance

### 2.1 Background

During the initial phase of MTLAS implementation, MFCC is conducting a series of trial shipments.

Certification bodies may encounter partial/minor non-conformances that for a range of possible reasons are impossible to correct. Moreover, in some cases retrospective verification is no longer a realistic option.

MFCC recognises these types of scenarios could conflict with MFCC policy which states that where there are non-conformances a client will either receive a recommendation for certification (or recertification) by the certification body upon acceptable review of proposed corrective actions and closure schedule(s) or a re-audit is conducted.

As illustration and example:

- 1) the entity has changed location and thus rehoused records. Records requested by the certification body are unavailable (misplaced in the process);
- 2) MTLAS criteria concerning health and safety requires that a forest entity conduct OHS trainings, supply adequate safety equipment and retain related records.

In a forest extraction scenario from previous years, the extraction team will have dispersed. An entity may be able to demonstrate compliance to OHS requirements for current operations, or respond to CARs for future compliance.

However, it may be that historical records of OHS, for whatever reason, is unavailable. In addition, interviews (of previous extraction teams) as an additional means of verification are not viable (because teams not available).

### 2.2 Guidance

In such scenarios where non-conformances may have been issued, it is at the discretion of the certification body as to whether certification can be granted.

This temporary guidance relates to partial/minor non-conformances only, and the certification body will be confident that:

- 1) the situation is genuine and legitimate to warrant an exception;
- 2) there are no realistic other options to verify a claimed compliance;
- 3) the entity and/or related authorities are committed to, and able to demonstrate, taking steps to remedy the non-conformance for future operations.

In all instances where a waiver is granted, a certification body will provide, within the audit report, a written explanation and rationale.

Failure to implement agreed commitments by the time of future audits will automatically result in a major non-conformance. In relation to this please refer to 2.4 Internal Office Order.

### 2.3 Review

This guidance and exception will be reviewed following the end of the current trial shipment.

## 2.4 *Internal Office Order*

### 2.4.1 Introduction

In response to corrective action requests (CARs) issued by certification bodies, the relevant body, Myanmar Forest Department or Myanma Timber Enterprise, formulate a management and action plan in response to the CARs.

Once agreed the plan and related requirements are disseminated as an “internal office order” (IOO) to state/regional levels for further internal circulation, and execution.

### 2.4.2 Scope and Application

An internal office order can cover more than one corrective action.

Critically, the required action(s) contained in internal office orders will be applicable beyond the location or entity of a given forest audit.

As illustration, a certification body may raise a corrective action request following a limited audit of one forest management unit. However, the resulting corrective action, issued through an internal office order, will be applicable, in terms of official requirements, to all forest units specified (often nationwide).

### 2.4.3 Audits

Certification bodies will need to check compliance to internal office orders following their release in all applicable entities.

### 2.4.4 Availability

MFCC maintains a register of internal office orders. Prior to a forest audit the certification body will ensure they have all applicable internal office orders.

### 3 Document History

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