



**Guide to Auditing and Certification Procedure using Risk Assessment Tool
under NCCF ToF Certification Scheme**

NCCF-GD-RAT-ToF01/2021

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Foreword

Network for Certification and Conservation of Forests (NCCF), a not for profit organization of India, was established in January 2015 and registered under the Societies Registration Act, 1860. NCCF is actively engaged in diverse conservation activities including development of globally benchmarked and India specific sustainability certification standards for various constituents of our natural resource base, viz; forests, trees outside forests, non-wood forest produce, protected areas and wetlands, quality planting material, ecotourism, biomass and biofuels, land degradation neutrality, *etc.*, as its core working areas, and also addressing the needs for policy advocacy in natural resource management, awareness raising, capacity building in and multi-stakeholders engagements.

NCCF has developed some first-of-its-kind certification standards in India, viz. NCCF Forest Management, NCCF Trees outside Forests (ToF) and also working for developing certification schemes for Protected Areas and Wetlands (PAWs), Non-Wood Forest Products (NWFP), Quality Planting Material (QPM), Ecotourism, Biofuel and Biomass, Carbon Registry, a platform for tracking and trading verified GHG emissions reductions and removal enhancement and Safeboards Certification Standards.

This document Guide to Auditing and Certification Procedure using Risk Assessment Tool under NCCF ToF Certification Scheme emphasize on laying out detailed procedural course for certification NCCF Trees Outside Forest Standard.

This guidance is designed to help the certification applicants, certification bodies and auditors to carry out independent third-party audits and provide certification to ToF applicants post the Risk Assessment exercise.

The guide aims to describe the requirements and give guidance on activities to be performed by a certification body and/or auditor to ensure achieve compliance before granting the NCCF ToF certificate to any applicant. This document, however, does not prescribe how systems and procedures should be designed to achieve compliance against ToF Standard requirements. All guidance in this document is hence indicative of the next and best possible approach.

Contents

Foreword.....	3
1. Scope.....	5
2. Normative References.....	5
3. Role of NCCF and Certification Bodies	5
4. About Risk Assessment Tool	5
5. Certification Options.....	6
6. Application for Certification.....	6
7. Option B: Risk Assessment Based Certification.....	6
7.1. Risk Assessment.....	6
7.2. Certification Process for Low Risk	7
7.3. Certification Process for Medium Risk.....	8
7.4. Certification Process for High Risk	8
8. Handling of ToF Certified Material	8
Annex 1: Risk Assessment Tool.....	9
Annex 2: Terms and Definitions.....	10
Annex 3: Self Declaration Template for Conformity	11

1. Scope

This document defines detailed procedural flow and steps for organization/s seeking NCCF Trees Outside Forests certification for regions which would use Risk Assessment Tool.

The ToF certification could be achieved through various steps as laid down in this document based on the type of application, requirement of organization applying, and the compliance level achieved by the organization at the preceding steps.

Risk Assessment Study shall be applicable in specified ToF areas within a state or UT with respect to the selected single tree species. When getting PEFC CoC Certification, wood and tree based material certified used RAT will be eligible to enter the supply chain as certified input material.

1. RAT applicable to all areas less than 0.1 ha and upto 5 ha area, of individual holding. (Refer Clause 5. 3)
2. For a single block with individual ownership, areas above 5 ha, regular ToF certification has to be followed. (Refer Clause 5. 1)

2. Normative References

- a. *NCCF ToF Certification Standard (NCCF-STD-ToF-01-2019)*
- b. *Chain of Custody of Forest and Tree Based Products –Requirements (PEFC ST 2002)*
- c. *NCCF Risk Assessment Tool*
- d. *Accreditation and Certification Requirements for CBs under NCCF ToF Certification Scheme (NCCF-STD-ACR-ToF 01 /2019)*
- e. *ISO/IEC 17050-1: Conformity assessment — Suppliers declaration of conformity (Part 1: General requirements)*
- f. *ISO/IEC 17065: Conformity assessment — Requirements for bodies certifying products, processes and services (as applicable)*
- g. *ISO/IEC 17021: Conformity assessment — Requirements for bodies providing audit and certification of management systems (as applicable)*

3. Role of NCCF and Certification Bodies

- 3.1. NCCF is a standard setting organisation which develops standards for certification of natural resources and/or natural resource based products. Risk Assessment Tool is developed and owned by NCCF.
- 3.2. All Risk Assessment Studies using RAT shall be done by a notified Certification Body.
- 3.3. Notified CBs while doing RAS will collect geographical coordinates of the polygons sites, provide to NCCF, which will be used by NCCF in creation of maps, including areas which will be excluded from scope of certification.

4. About Risk Assessment Tool

- 4.1. The Risk Assessment Tool (RAT) is developed with the objective of assessing the levels of risk (**low, medium, high**) for a selected region in order to assess the level of conformance in respect of the specified tree species grown in the region against NCCF Trees outside Forests certification standard.

The overall score obtained/found as a result of assessment against the RAT shall determine the certification process required to be followed for certification as per the NCCF ToF Standard.

The overall score obtained/found as a result of assessment against the RAT shall be valid for a period of 5 year unless NCCF decides to revise the risk assessment study due to:

- a) changes in administrative, social and environmental circumstances/parameters, or

- b) analyses of complaints received, or
- c) substantial change in client's scope

5. Certification Options

- 5.1. **Option A: Certification** without using RAT.
Under this option, regular certification process will be applicable using the ToF certification standard **(NCCF-STD-ToF-01/2019)**
- 5.2. Before exercising Option B, the applicant has to have a valid PEFC CoC certification. This will ensure that they can handle material coming out from certified areas.
- 5.3. **Option B: Risk Assessment Based Certification**
Under this option, an applicant sourcing wood from a single tree species in a specified region within a State or UT, can approach NCCF for assessing using the RAT and further certification process shall be guided by the overall risk designation for the geographical region and the tree species.
- 5.4. **Group Certification:** Where applicable shall be carried out as per the Group Certification Standard **(NCCF-STD-GM-ToF 01/2019)**

6. Application for Certification

- 6.1 In case of Option A, the applicant shall approach a notified Certification Body directly for the application and follow the certification process and procedure as directed by them.
- 6.2 In case of Option B, applicant shall write to NCCF for getting the Risk Assessment done of a defined geographical area within a state or UT. Risk Assessment request will serve as application for NCCF.
 - 6.2.1 Upon receipt of the proposal for the Risk Assessment, NCCF shall review it and initiate the process for Risk Assessment.
 - 6.2.2 NCCF will invite proposals from notified CBs for carrying out the Risk Assessment.
 - 6.2.3 Successful notified CBs shall be engaged by NCCF to carry out the Risk Assessment for the specified geographical region and species. Based on the result of assessment the area shall be categorised as low risk, medium risk, or high risk area.
 - 6.2.4 NCCF will inform applicant about its decision on risk Assessment.

7. Option B: Risk Assessment Based Certification

7.1. Risk Assessment

While assessing risk against NCCF ToF certification standard, the aim is to identify areas with high probability of non-conformances, when ToF standard will be implemented in ToF areas.

Risk can generally be defined based on factors such as magnitude (intensity) of the relevant activities, timescale, and level of impact on affected groups. Based on the understanding of these factors and previous similar studies/assessments done in the past, risk level identified shall determine the level of non-conformity an organization/applicant may face in the region. Higher level of risk identified will mean higher the chances of non-conformities against the NCCF ToF Certification Standard. Low level of risk identified will mean low chances of non-conformance or high chance of conformance against the NCCF ToF standard.

- 7.1.1. NCCF will conduct Risk Assessment (RA) of the applicant's procurement areas and species as determined from the applicant proposal and/or on request of the industry (organization).
- 7.1.2. NCCF will engage a notified certification body for conducting RA using **RA Tool (RAT): Annex 1.**

7.1.3. Based upon the results of RA the region will be categorised into three risk levels:

- a) Low risk
- b) Medium risk
- c) High risk

The categorisation will remain valid for a period of five years unless reassessment is done before that under special circumstances.

7.1.4. Special circumstances will include:

- a) changes in administrative, social and environmental circumstances/parameters, or
- b) analyses of complaints received, or
- c) substantial change in client's scope

7.2. Certification Process for Low Risk

Area declared as low risk in a Risk Assessment Study will be treated as deemed certified. Until the risk designation is changed.

Individuals/organisations procuring raw material from these areas will have to follow:

7.2.1. Document review for such applicant shall be done by NCCF by submission of details on via the NCCF Certification portal.

7.2.2. Applicant organisation shall provide self-declaration along with other relevant supporting purchase and material origin documents on the NCCF Certification portal. (Annex 3).

7.2.3. NCCF will examine the self-declaration and additional evidence for approval and inform the applicant via the portal.

7.2.4. Organisation(s) procuring from low risk areas need to mandatorily have PEFC CoC certification before they can start using PEFC ToF claim.

7.2.5. Organisation shall maintain all documents and records for a period of five years.

7.2.6. Batch Accounting

7.2.6.1. The CB will ensure material balance data from their clients on a monthly basis to be provided to NCCF.

7.2.6.2. For each supplier, the organisation shall undertake raw material accounting in batches, with a unique batch number.

7.2.6.3. Organisation shall assign separate batch numbers for each supply line e.g., separate batch numbers for different supplier, species, states/UTs.

7.2.6.4. Organisation shall ensure that the batch numbers are referenced to the incoming supplier invoices as well as to the outgoing product invoices. It should be possible to trace the record of all supplier invoices that have contributed raw material to a particular batch as well as each outbound product invoice.

7.2.7. Batch Approval

7.2.7.1. Following the batch accounting process, approval for each batch will be provided by NCCF.

7.2.7.2. Batches submitted to NCCF via the NCCF certification portal will be approved on a weekly basis.

Note: In case of secondary or tertiary sales, batch accounting and batch approval will not be required. In these cases batch will be traced from the primary organization/applicant generating the batch.

7.3. Certification Process for Medium Risk

In case of areas declared as medium risk based on Risk Assessment Study, the applicant shall be required to obtain NCCF ToF Certification following the process applicable for the ToF certification standard (**NCCF-STD-ToF-01/2019 by applying to a notified CB.**

7.3.1. Document Review by Certification Body

Applicant organisation procuring from region classified as “Medium risk” during RA (Section 7.1.3.) shall contact any any of the notified CB for certification. **Refer Section 5.1. needs discussion.**

7.3.2. Evaluation

To follow as per **NCCF-STD-ACR-ToF-01/2019.**

7.3.3. Certification Decision

To follow as per **NCCF-STD-ACR-ToF-01/2019.**

7.3.4. Batch Accounting

Refer Clause 7.2.6

7.3.5. Batch Approval

Refer Clause 7.2.7

7.3.6. Surveillance and Recertification

7.3.6.1. Organisation shall maintain all documents and records for a period of 5 years.

7.3.6.2. Third party certification audits shall be performed for 2nd and 4th year of surveillance to demonstrate continued compliance.

7.3.6.3. Third party certification audits shall be performed during 5th year of certification cycle to complete the process of recertification.

7.4. Certification Process for High Risk

In case of areas declared as high risk based on Risk Assessment Study the applicant shall be required to obtain a NCCF ToF Certification following the process applicable for the ToF certification standard (**NCCF-STD-ToF-01/2019 by applying to a notified CB.**

Same Certification Process shall be followed as for Option A. **Refer Section 5.1 as per NCCF-STD-ACR-ToF-01/2019.**

8. Handling of ToF Certified Material

PEFC Chain of Custody of Forest and Tree Based Products – Requirements Standard (ST 2002) includes trees outside forests or tree based raw material (as input material as ‘100% PEFC certified’) in the scope of CoC Certification. The processes for handling PEFC certified tree-based material is same as that for handling forest/wood products procured from PEFC certified forest area.

Organisation procuring such raw material, from PEFC-NCCF certified ToF areas, with or without using Risk Assessment Tool, shall be processed as equivalent to ‘100% PEFC Certified claim’ under Chain of Custody operations.

9. Mapping and Recording of ToF Areas

NCCF will be maintaining details of all results of Risk Assessment areas. Polygons of these areas will be available on NCCF certification portal with risk levels.

Annex 1: Risk Assessment Tool

(Annexes to this guide provide guidance on issues that are not enforced through the accreditation process.)

A. Initiation of any Risk Assessment using RAT shall include the following steps: (detailed process)

1. Call of an EoI/proposal/letter/email by NCCF on behalf of stakeholder(s) or suo-motu.
2. NCCF makes a public announcement for the Risk Assessment on its website.
3. Risk Assessment Request for Proposal will cover the required technical and non-technical details of the area to be assessed.
4. NCCF shall use the services of two Certification Bodies when carrying out Risk Assessment Study.
5. NCCF shall release a 30 days stakeholder announcement *via* NCCF website for the proposed area to undergo Risk Assessment. The stakeholder announcement shall invite stakeholders to meet with audit team, or to submit written submission if preferred.
6. Risk Assessment shall include Certification Bodies, representatives from NCCF and other stakeholders as Observers.
7. Field sampling will be based on proportional allocation according to the occurrence of plantation type (block, non-block covering linear, scattered, *etc.*)
8. When two notified CBs are involved in RAT, in case of conflict, higher risk result (of the two CBs) shall be considered final
9. Risk Assessment Report shall be peer reviewed before being publicly available.
10. Risk Assessment Report shall be a public document and available on NCCF website.
11. Risk Assessment Report shall be available within 120 days from the date of announcement of the stakeholder consultation on NCCF's website.

B. Using Risk Assessment Tool

1. Certification Bodies when required to carry out certification in a particular region can use the RAT to assess conformance before applying for ToF evaluation.
2. The results of risk assessment shall be made available to NCCF by the respective CB for publishing on its website/portal.
3. Risk assessment shall decide the type of auditing and certification process adopted by the CB.
4. Limits for using RAT:
 - a) Upper threshold: Entire State
 - b) Lower threshold: 5 ha
 - c) Number of divisions possible for a State: Equal to or less than the number of administrative units/districts
5. As per the facts, secondary data, reports, field verifications, areas maybe excluded or included as part of the RA.

C. Person Day Requirements when using RAT

1. When performing Risk Assessment, Certification Body may refer the below person day requirements. The same maybe used for doing audits for medium/high risk areas.

LMU Area	Number of days
< 1000 ha	2 to 3
1,001 – 5,000 ha	3 to 5
5,001- 10,000 ha	5 to 8
10,001 – 25,000 ha	8 to 12
25,001 – 75,000 ha	12 to 16
75,001- 1,00,000 ha	16 to 20
> 1,00,00 ha	20 to 24

Annex 2: Terms and Definitions

Annexes to this guide provide guidance on issues that are not enforced through the accreditation process.

Applicant: An organisation which makes a formal application for ToF certification or Risk Assessment Study.

Audit: Systematic, independent, documented process for obtaining records, statements of fact and other relevant information and assessing them objectively to determine the extent to which applicable requirements are fulfilled.

Auditor: A person competent to conduct an audit.

Audit team: It is made up of one or more auditors, one of whom is appointed to be the audit team leader. When necessary, audit teams are also supported by technical experts and/or further personnel (*e.g.* interpreter), who assist auditors but do not themselves act as auditors.

CB: Independent third-party certification body operating the certification scheme.

Certification: Third-party attestation related to products, processes, systems or persons.

Chain of Custody Standard: PEFC ST 2002: Chain of Custody of Forest and Tree Based Products – Requirements.

Client: Organization, including a multi-site organization, that is applying for or whose area has been certified.

Certificate: A document issued under the rules of a certification system, indicating that adequate confidence is provided that a duly identified product, process or service is in conformity with a specific standard or other normative document.

Group Certificate: A document confirming, compliance with the standard and other applicable requirements of the certification scheme for the group organisation.

Group Certification: Certification of the group organisation under one (group) certificate.

Risk: Possibility of undesired activities. It involves uncertainty about the effects/implications of an activity often focusing on negative, undesirable consequences.

Self declaration: It means that an organization issues a statement based on its own determination that upon review of its management system, it affirms to have met all the specified requirements. Rather than seeking external assistance to prove it, the organization is retaining the responsibility on itself. The burden of proof that the organization has met all the requirements of the respective standard remains on the organization.

Annex 3: Self Declaration Template for Conformity

Supplier's declaration of conformity (in accordance with ISO/IEC 17050-1)

1. S. No./Document No. (Unique Number)
2. Issuer's name:
3. Issuer's address:
4. Object of the declaration
5. The object of the declaration described above is in conformity with requirements of the following documents:

S. No.	Title	Edition/Date of Issue

6. Additional information:
7. Signature for and on behalf of (with place and date of issue):
8. Signature or equivalent authorized by the issuer (name, designation)
9. List of additional evidence:
 - a. Source of origin documentation
 - b. Sale invoice documents
 - c. Transit Documentation
 - d. Weighment bridge slip

This declaration of conformity is issued under the sole responsibility of the manufacturer or representative. It confirms compliance with the indicated Standards but implies no warranty of properties.

This declaration is in conformity with the International Standard ISO/IEC 17050-1 "Conformity assessment— Supplier's declaration of conformity — Part 1: General requirements".

This declaration is valid until further notice.

Note: The "Manufacturer's Declaration of Conformity with International Standards" is independent of other declarations of conformity.