

American Tree Farm System®

2021 Independently Managed Group (IMG) Certification Standards V2.1

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1 Introduction

The 2021 **American Tree Farm System® (ATFS) Independently Managed Group (IMG)** Certification Standards replaces the 2015-2020 IMG Standard Operating Procedures. In addition to these **ATFS IMG** Certification Standards, there are a number of other ATFS standards, polices and guidelines that should be followed to effectively achieve independent certification and conform to overall ATFS requirements. These standards, polices and guidelines are listed below as reference documents.

1.1 Purpose and Scope

The **American Tree Farm System® (ATFS) Independently Managed Group (IMG)** Certification Standards 2021 contain the requirements for the implementation by, and independent certification of, **Independently Managed Groups (IMG)** and associated **Group Members**. These standards apply specifically and exclusively to **IMGs** as a type of **Group Organization**, and do not apply to State Tree Farm programs, ATFS third-party certificate holders, or to **Forest Management Units** enrolled in the Small Lands Module developed in cooperation with the Sustainable Forestry Initiative (SFI).

Group Organizations are comprised of multiple **Group Members** and represented by a **Group Entity**. **Group Member** properties are organized under one centrally administered **Group Management System** and included in a single **Group Certificate**. The **Group Entity** holds the **Group Certificate** on behalf of the **Group Members and represents the Group Organization**. This process is referred to throughout the document as “**Group Certification**.”

Generally, the **Group Entity** has overall responsibility for ensuring conformance with the **AFF Standards of Sustainability** and the IMG Certification Standards. The **Group Entity** designates a **Group Manager** who is responsible for the day to day administration of the **Group Management System** and coordinates certain activities, such as:

- Internal and external communication
- ensuring conformance to the **AFF Standards of Sustainability** and the IMG Certification Standards,
- administering entry and departure of **Group Members**,
- maintaining records and reporting,
- conducting ongoing **Internal Monitoring, Internal Audits, and Internal Management Reviews**
- implementation of a dispute resolution process,
- managing the **Group Certification** process.

1.2 ATFS Eligibility Requirements

To qualify for enrollment in a **Group Certification** under the **ATFS IMG** Certification Standards, prospective **Group Members** and their **Forest Management Units** shall meet the eligibility requirements stipulated in the **ATFS** Eligibility Requirements and Guidance for Certification. Contiguous properties up to 20,000 acres in size are eligible for enrollment in **IMGs**.

Group member conformance with **AFF Standards of Sustainability** is a fundamental requirement for participation in ATFS IMG Group Certification.

ATFS reserves the right to refuse certification to landowners whose documented actions or values are, in the judgment of **ATFS**, in conflict with the values and mission of the **American Forest Foundation (AFF)**.

1.3 Use of the Standard

All aspects of this standard are applicable to **Group Organizations** seeking certification under the **American Tree Farm System®**. The Standards are designed to accommodate the range and diversity of **Group Members** and **Forest Management Units** eligible to participate in the **ATFS** under the IMG Certification Standard. As such, the IMG Certification Standards should be utilized adaptively and as appropriate for the size, scale and intensity of the woodlands and operations.

Use of the word “shall” indicates standard elements required for certification under the American Tree Farm System®. The word “should” indicates elements that are encouraged but allow for user discretion and provides latitude in implementation to the greatest practical extent in given circumstances. In all instances, overall implementation of the standard shall be found justifiable in an **External Certification Audit**.

Bold type throughout this document denotes words or phrases defined in the Terms and Definitions section.

1.4 Effective Date

The 2021 ATFS IMG Standards were originally enacted on January 1, 2021 and amended to V 2.0 on March 10, 2022. Group Organizations with 2021 ATFS IMG Group Certificates shall have June 1, 2022 to May 31st, 2023 as the implementation period for amended Standards, during which they will make modifications to bring IMGs into conformance with the requirements contained herein. The next regularly scheduled surveillance audit after May 31, 2023, shall conform to the 2021 ATFS IMG Standards V 2.0.

2 Reference Documents

The following documents are relevant to the application of the American Tree Farm System 2021 Independently Managed Group (IMG) Certification Standards, and conformance with related requirements of the American Tree Farm System®.

American Forest Foundation 2021 Standards of Sustainability V2.0, March 10, 2022.

American Tree Farm System® Eligibility Requirements and Guidance for Certification V2.0, March 10, 2022.

American Forest Foundation Disputes and Appeals Procedures. May 20, 2021.

American Forest Foundation Guidance on IMG Transfers. October 18, 2016.

IMG Reporting Guidance for ATFS Data Integration. January 2022.

American Tree Farm System® Group Certification Process, 2022 Annual Reporting Form

American Tree Farm System® Inspecting Forester Compliance Policy. October 18, 2016.

American Tree Farm System® Tree Farm Inspection Record, ATFS Form 021. January 2021.

Rules For Use of AFF's American Tree Farm System® Owned Logo Registered Marks. 2014

3 Terms and Definitions

For the purposes of this document, the terms and definitions in the **American Forest Foundation Standards of Sustainability** and the **American Tree Farm System® Eligibility Requirements** and Guidance for Certification apply together with the following definitions.

Accreditation Body: An independent third-party entity approved by the International Accreditation Forum (IAF) to assess and confirm specified requirements related to **Certification Bodies** have been met. Accreditation is the process of evaluating the competence of a **Certification Body**.

Affected Stakeholder: A stakeholder who might experience a direct change in living and/or working conditions caused by activities of the **Group Organization**. *Note: Examples of affected stakeholders include neighboring communities, indigenous people, **Group Members**, workers, etc. In the United States, an extensive framework of state and federal laws and regulations pertaining to fair labor practices, environmental impact, tribal sovereignty, and private property rights, is designed to prevent harmful changes in living and/or working conditions for individuals and communities adjacent to lands where forest management occurs.*

American Forest Foundation (AFF): A US-based national nonprofit organization focused on promoting sustainable stewardship of America's woodlands.

AFF Standards of Sustainability: A set of standards based on international sustainability metrics and North American guidelines for sustainable forest management that serve as the normative basis for the **American Tree Farm System® (ATFS)** certification program. All components of each standard apply to every property certified under the ATFS. The AFF Standards for Sustainability is owned by the American Forest Foundation.

American Tree Farm System® (ATFS): ATFS is a forest certification system operated by the **American Forest Foundation (AFF)** in the United States. It is internationally recognized by the **Programme for the Endorsement of Forest Certification** and meets strict third-party certification standards. ATFS certification is predicated upon conformance with the **AFF Standards of Sustainability**. ATFS specializes in certifying private forests, primarily those held by individuals and families.

ANSI National Accreditation Board (ANAB): A non-governmental organization recognized by the International Accreditation Forum (IAF) that provides accreditation services for **Certification Bodies** approved to evaluate conformance to the **AFF Standards of Sustainability**.

ATFS Eligibility Requirements: A set of formally established requirements developed to ensure that **ATFS** certification remains consistent with the **AFF** mission of outreach to family landowners and to positively affect the management of their lands. Eligibility requirements are stipulated for landowners and associated forest lands to participate in the **ATFS** and are documented in “**American Tree Farm System**® Eligibility Requirements and Guidance for Certification.”

ATFS Inspecting Forester: A qualified natural resource professional who has completed **ATFS**-required training for certifying forested properties and is eligible to inspect properties on behalf of **ATFS**. **ATFS** requires all trained inspectors meet approved eligibility requirements. Also referred to as “ATFS Inspector”.

Certification Body (CB): A third party entity whose role is to provide independent assurance of conformance to established standards. CBs are evaluated and approved by a recognized **Accreditation Body** to ensure the impartiality and competence of the CB. CBs accredited by **ANAB** are recognized by **AFF** as trained and approved for third-party auditing to the **AFF Standards of Sustainability**.

Certified Area: The forest area covered by an **ATFS** certificate. In the context of **IMG** certification, the certified area is the sum of forest areas of the **Group Members** and covered by a **Group Certificate**.

Document Confirming Participation in the Group: A document issued to a **Group Member** that refers to the **IMG Group Certificate** and confirms the **Group Member** is being covered by the scope of the group forest certification.

Documented Information: Information required to be recorded, controlled, and maintained by an **IMG** using any format and media, from any source.

External Certification Audit: A formal, independent audit of a **Group Organization** conducted by an accredited **Certification Body** to assess conformance with the **AFF Standards of Sustainability**, the **ATFS IMG Certification Standards**, and related requirements.

Forestry Contractor: A person or organization with appropriate experience and qualifications who is hired by contract or similar agreement to provide discrete forestry services to **Group Organizations** or **Group Members**. Forestry contractors may include foresters, ecologists, biologists, loggers, or other technically trained specialists in related forest management functions.

Forest Management Unit: Contiguous forested parcels under the legal tenure or ownership of one entity. Non-forest areas may be deducted from the total area of the parcel for the purpose of determining eligibility for participation in the **American Tree Farm System**®.

Group Certificate: A formal document issued to a **Group Entity** confirming that the **Group Organization** complies with the requirements of the **ATFS IMG Certification Standards** and other applicable requirements of the **ATFS** forest certification system.

Group Certification: Certification of the **Group Organization** under one **ATFS Group Certificate**, consistent with the requirements of the **ATFS IMG Certification Standards**.

Group Entity: A legal entity competent to sign agreements with **Group Members** and to enter into binding contracts with **Certification Bodies** and other outside entities. The Group Entity represents the

Group Members, with overall responsibility for ensuring the conformity of forest management in the **Certified Area** to the **AFF Standards of Sustainability** and other applicable requirements of the forest certification system, including the IMG Certification Standards. The structure of the group entity should align with the scale and complexity of the group organization. *Note: Group Entity was previously referred to as "group organization" in the American Tree Farm System "2015-2020 IMG Standard Operating Procedures."*

Group Manager: The individual(s) designated by an **IMG Group Organization** to manage the administrative elements of the **Group Organization**, including implementation of the Group Management System and conformance with the **American Tree Farm System® IMG Certification Standards**.

Group Member: A forest owner or manager covered by the **Group Certificate**, who has the ability to implement the requirements of the **AFF Standards of Sustainability** in a Certified Area. **Group Members** shall have a long-term legal right, tenure right or traditional or customary tenure rights to manage the forest. Short-term **Forestry Contractors** are not eligible to participate as Group Members. *Note: Group Member is equivalent to "participant" as defined in the PEFC Group Forest Management standard (PEFC ST 1002:2018).*

Group Management Plan: Documented Information specifying objectives, **Group Management Policies**, actions and control arrangements for the operation and management of a Group Organization. It incorporates planned changes of the **Group Management System** and requirements of the **AFF Standards of Sustainability** that are addressed at the group level.

Group Management Policy: Intentions and direction of a **Group Organization**, as formally expressed by the **Group Entity**.

Group Management System: Set of interrelated or interacting elements of a **Group Organization** to achieve the objectives and outcomes of the **AFF Standards of Sustainability** and the **ATFS IMG Certification Standard** requirements.

Group Organization: A collection of **Group Members** represented by the **Group Entity** for the purposes of implementation of the **AFF Standards for Sustainability** and its certification under the **ATFS IMG Certification Standards**. A binding written agreement shall be established between a **Group Member** and the **Group Entity**. *Note: The term "Group Organization" is synonymous with "IMG" in the context of the American Tree Farm System IMG Certification Standards. See below.*

Independently Managed Group (IMG): Synonymous with Group Organization. The IMG supports **Group Members** in the stewardship of **Forest Management Units** under a single, centrally administered **Group Certification**.

Internal Monitoring Plan: A document that describes the frequency, actions and methods employed through the **Internal Monitoring Program**.

Internal Monitoring: An organized and integrated set of activities undertaken by the **Group Entity** to evaluate the performance of the **Group Organization** in implementing the **group management system** to maintain ongoing conformance with the **AFF Standards for Sustainability**. Internal monitoring includes ongoing observation and assessment of forest operations and associated activities. Internal

monitoring is typically conducted by individuals who are familiar with, and directly or indirectly involved in, the processes being monitored. Internal monitoring occurs on an ongoing basis throughout each year subject to the frequency of activities being monitored.

Internal Audit: Systematic, independent, documented process undertaken by the **Group Organization** (first party audit) for obtaining objective evidence to assess conformance with the **AFF Standards of Sustainability**, the **ATFS IMG** Certification Standard, and the requirements of the **Group Management System**. Internal audits are conducted by individuals who are independent of the processes being evaluated and occur on an annual basis.

Internal Auditor: Individuals that conduct first-party audits and report results on behalf of the Group Entity. They may be internal staff or external contractors; however, they shall be independent of the processes and activities being audited. Internal auditors shall provide an impartial, unbiased assessment and avoid any conflict of interest. Internal auditors should have knowledge and experience in forestry and with applicable certification standards.

Internal Management Review: A formal, annual review conducted by the **Group Entity** to determine the effectiveness of the **Group Organization** in achieving objectives and maintaining conformance with the **AFF Standards of Sustainability** and the **ATFS IMG** Certification Standards. The management review includes review of changes to the operating environment as well as results and actions related to internal monitoring, internal audits, external certification audits, previous management reviews, and opportunities for improvement.

Umbrella Forest Management Plan: Forest management plans that may be utilized in the management of multiple parcels and **Forest Management Units**.

Programme for the Endorsement of Forest Certification (PEFC) International: An international non-profit organization dedicated to endorsing national forest certification systems such as **ATFS** that have been developed through multi-stakeholder processes and tailored to local priorities and conditions.

4 Group Organization Structure

4.1 Scope and Context of the Group

- 4.1.1 The **Group Entity** shall be a legal entity competent to sign agreements with **Group Members** and to enter into binding contracts with **certification bodies** and other outside entities.
- 4.1.2 The **Group Organization** shall adhere to **ATFS Eligibility Requirements** and may further define membership parameters, if desired.

4.2 Entry and Departure from the Group

- 4.2.1 The **Group Entity** shall define and administer a procedure for admitting **Group Members**. Conformance with **ATFS Eligibility Requirements** and **AFF Standards of Sustainability** shall be determined prior to **FMU** enrollment in the **group certificate**.
- 4.2.2 The **Group Entity** shall define and administer a procedure for expelling **Group Members** if they do not meet the requirements of the **AFF Standards of Sustainability** and **ATFS IMG Standards** and are not willing or able to take appropriate corrective action.
- 4.2.3 **Group Members** that have been expelled from any **Group Certificate** shall be internally audited by the **Group Entity** prior to admittance or re-admittance in the **Group Certificate**. The internal audit shall not take place sooner than 12 months after the **Group Member** was removed from the previous **Group Certificate**.

4.3 Roles and Responsibilities

4.3.1 Competency Requirements

- 4.3.1.1 All persons contributing to the **IMG Group Management System** shall possess sufficient qualifications and knowledge necessary to fully perform assigned roles. Minimum competency requirements shall be established and verified by the **Group Entity** prior to engaging the services of contributing individuals and entities, including **Internal Auditors** and **Forestry Contractors**.
- 4.3.1.2 Inspectors of the **Group Organization** conducting **Internal Monitoring** shall have completed the current **ATFS** Tree Farm Inspector training course.

4.3.2 Group Entity

The following functions and responsibilities shall be specified for the **Group Entity**:

- 4.3.2.1 The **Group Entity** shall describe roles and responsibilities of the **Group Entity**, **Group Manager** and **Group Members** with respect to forest management decisions and associated activities (e.g. plan development, harvesting, monitoring, etc.) as well as with implementation of the **AFF Standards of Sustainability** and the **ATFS IMG** Certification Standards.
- 4.3.2.2 The **Group Entity** shall designate a **Group Manager(s)** who is responsible for overseeing the administrative details of **Group Certification** and for ensuring compliance with all applicable requirements.
- 4.3.2.3 The **Group Entity** shall provide a written commitment that minimally includes the following elements. This commitment may be included in a **Group Management Policy** and shall be made publicly available upon request.
 - a. to operate an integrated **Group Management System** for maintaining conformance to the **AFF Standards of Sustainability**, the **ATFS IMG Standards** and other requirements of **ATFS** certification.

- b. to continuously improve the **Group Management System** and support the improvement of sustainable forest management on **Forest Management Units** enrolled in the **Group Organization's Group Certification**.
- 4.3.2.4 The **Group Entity** shall have a binding written agreement with each **Group Member** to minimally include the following elements:
 - a. a commitment by the **Group Member** to maintain conformance with the **AFF Standards of Sustainability**
 - b. the right of the **Group Entity** to ensure applicable corrective actions and preventive measures are implemented
 - c. the right of the **Group Entity** to initiate removal of **Group Members** from the **Group Certification** in the event of non-conformity with applicable standards.
- 4.3.2.5 The **Group Entity** shall implement and maintain a documented **Group Management System** to include a description of boundaries, applicability, and roles and responsibilities of all participants in the **Group Organization**. A description of the scope of the group management system shall be publicly available upon request.
- 4.3.2.6 The **Group Entity** shall develop and implement internal performance evaluation activities that collectively provide for the assessment of **Group Organization (Group Members and Group Entity)** conformity with the **Group Management System** and ATFS certification requirements. These internal assessment activities shall include the following elements:
 - a. Ongoing internal monitoring of conformance of the **Group Organization's** forest operations with the **AFF Standards of Sustainability** (Refer to Section 6.2)
 - b. Annual **Internal Audit** of the **Group Organization's** conformance with the **Group Management System**, inclusive of the **AFF Standards of Sustainability** (Refer to Section 6.3)
 - c. Annual **Internal Management Review** of the **Group Certification**, inclusive of internal and external monitoring and audit results, and actions taken as appropriate in response to the results of the management review (Refer to Section 6.4)
- 4.3.2.7 The **Group Entity** shall inform **Group Members** of any and all fees associated with administration of the **Group Certification**, if any, when they join the **Group Organization**.
- 4.3.2.8 The **Group Entity** shall hold the ATFS **Group Certificate** on behalf of the **Group Members** and represents the **Group Organization** in the certification process.
- 4.3.2.9 The **Group Entity** shall ensure that **Group Members** are notified that they are subject to all of the requirements and privileges of membership in the **American Tree Farm System®**.
- 4.3.2.10 The **Group Entity** shall make the **AFF Standards of Sustainability** accessible to **Group Members**.
- 4.3.2.11 The **Group Entity** shall issue a document to each **Group Member** that confirms the **Group Member** participation and coverage by the scope of the third-party certificate.
- 4.3.2.12 The **Group Entity** shall follow the ATFS logo use guidelines and ensure proper use of promotional claims about the **Group Certification**.
- 4.3.2.13 The **Group Entity** shall coordinate the independent audit procedure to ensure the **Certification Body** has access to sufficient information and **Group Member** properties to determine conformance to the **AFF Standards of Sustainability** and ATFS IMG Certification Standard.
- 4.3.2.14 The **Group Entity** shall verify if **Forest Management Unit** proposed for the **Group Certificate** are currently, or were previously, included in another **Group Certificate**. The **Group Entity** shall request **Group Members** to provide relevant information regarding participation in other group certificates, including the name and location of the group, as well as any identified nonconformities.

- 4.3.2.15 The **Group Entity** shall agree to provide full co-operation and assistance in responding effectively to all requests from the **Certification Body, Accreditation Body, PEFC International** or the **American Forest Foundation** for relevant data, documentation or other information; allowing access to the **Forest Management Units** enrolled in the **IMG Group Certification**, whether in connection with formal audits or reviews or otherwise related to the **Group Management System**.

4.3.3 Group Members

The following functions and responsibilities shall be specified for **Group Members**:

- 4.3.3.1 **Group Members** shall provide a written commitment to practice sustainable forestry, adhere to the requirements of the **Group Management System** and to meet all applicable requirements of the AFF Standards of Sustainability and related **ATFS** certification requirements on their **Forest Management Units** enrolled in **Certified Area** of the **Group Certification**.
- 4.3.3.2 **Group Members** shall agree to implement corrective and preventative actions established by the **Group Entity**.
- 4.3.3.3 **Group members** shall provide full co-operation and assistance in responding effectively to all requests from the **Group Entity**, or **Certification Body** for relevant data, documentation, or other information, and shall allow access to **Forest Management Units** included in the **Group Certification**, whether in connection with formal audits or reviews or otherwise related to the **Group Management System**.

4.4 Group Level Conformance

- 4.4.1 All **AFF Standards of Sustainability** apply to every **Forest Management Unit** included in an **Group Certificate**, however conformance to some requirements may be demonstrated at the group level. Specifically, at the discretion of the **Group Organization**, and as noted in the Guidance for Performance Measure 1.1 of the **AFF Standards of Sustainability, Umbrella Management Plans** may be used in the management of multiple **forest management units**.
- 4.4.2 If a **Group Organization** elects to fulfill any requirements of the **AFF Standards of Sustainability** at the group level as opposed to the individual **Forest Management Unit** level, these requirements shall be recorded in the **Group Management Plan**.
- 4.4.3 The **Group Entity** shall ensure that each **Forest Management Unit** included in the **Certified Area** either has an individual forest management plan or is covered by an **Umbrella Management Plan**.

5 Group Management System

5.1 Planning and Operation

- 5.1.1 Resources needed for the establishment, implementation, maintenance, ongoing conformance, and continual improvement of the **Group Management System** shall be determined and provided.
- 5.1.2 **Group Organizations** shall plan, implement, and control processes needed to maintain conformance with the requirements of the **AFF Standards of Sustainability** and the IMG Certification Standards. These processes shall be included in the **Group Management System** and described in the **Group Management Plan**.
- 5.1.3 Criteria shall be established for processes defined in the **Group Management System**, and these processes shall be implemented in accordance with established criteria. **Documented**

information shall be retained to the extent necessary to demonstrate processes have been properly implemented.

- 5.1.4 The **Group Entity** shall have a procedures for periodically assessing, planning and implementing any changes in **Group Organization** structure or the **Group Management System** needed for ongoing conformance and continual improvement. Any such planned changes shall be recorded in the **Group Management Plan** prior to implementation.

5.2 Internal and External Communication

- 5.2.1 Internal and external communication activities relevant to the **Group Management System** shall be implemented according to established protocols addressing purpose, subject matter, methods, frequency, and recipients.
- 5.2.2 Communication processes shall be defined and regularly implemented to ensure **Group Members** remain informed of key aspects for participation in the IMG **Group Certificate** to include, at a minimum, the following:
- Group Management Policy**
 - Requirements of the AFF Standards of Sustainability**
 - Roles and responsibilities for maintaining effectiveness of the **Group Management System**, including sustainable forest management and continual improvement of **Group Organization** performance
 - Dispute resolution procedures
 - Implications of non-conformance with the requirements of the **Group Management System**
- 5.2.3 **Affected Stakeholders** that are relevant for the **Group Management System** shall be identified along with the relevant expectations of these **Affected Stakeholders**. **Affected Stakeholders** include **Group Members** as well as external individuals and entities directly affected by **Group Organization** activities included in the scope of the **Group Certification**. See [Appendix A: Affected Stakeholder Identification and Communications](#).

5.3 Dispute Resolution

- 5.3.1 The **Group Organization** shall have a procedure for addressing and resolving disputes regarding conformance with the **AFF Standards of Sustainability** between and among the Group Members and the **Group Organization** pertaining to ATFS certification.
- 5.3.2 The **Group Organization** shall follow and conform to the **AFF Disputes and Appeals Procedures** and assist **ATFS** in resolving any such complaints.

5.4 Record Keeping and Reporting

- 5.4.1 **Documented information** relevant to the **Group Management System** and the conformance with the requirements of the **AFF Standards of Sustainability** is adequately protected against loss of confidentiality, improper use, or loss of integrity.
- 5.4.2 The **Group Entity** shall maintain current internal **Group Member** records and provide updated information on a regular basis to the **ATFS** database to reflect entries and departures of **Group Members** from the **Group Organization**. **Group Member** records shall minimally include contact details, size and location of enrolled **Forest Management Units** and corresponding **Certified Area**, and conformance with applicable **ATFS** certification requirements.
- 5.4.3 The **Group Organization** shall adhere to the annual reporting requirements as defined by **ATFS** IMG Reporting Guidance for **ATFS** Data Integration (January 2022) and maintain copies of past annual reports.

- 5.4.4 The **Group Entity** shall submit a copy of the **IMG Group Certificate** and a summary of the audit report that is appropriate for public distribution to **ATFS**.

5.5 Chain of Custody

- 5.5.1 Chain of custody systems track certified wood fiber from the forest through the supply chain to an end user. The **ATFS** certification system does not operate a chain of custody system. However, as a **PEFC**-endorsed forest certification system, wood harvested from **Forest Management Units** included within the **Certified Area** of an **IMG Group Certificate** are eligible to be included under **PEFC**, Canadian Standards Association (CSA) and the Sustainable Forestry Initiative's (SFI) chain of custody systems. Each of these certification systems has developed standards outlining the requirements for their respective chain-of-custody systems.

6 Performance Evaluation

- 6.1 All **Group Members** shall be subject to ongoing Internal Monitoring and the **Internal Audit** program.

6.2 Internal Monitoring Program

- 6.2.1 An ongoing **internal monitoring** program shall be established and implemented by the **Group Entity** to assess the effectiveness of the **Group Organization** in implementing the **Group Management System** to maintain conformance with the **AFF Standards of Sustainability**. The **internal monitoring** program shall at minimum define the following:
- Values, processes, and corresponding criteria to be monitored
 - methodology used to ensure valid monitoring results
 - when monitoring and measuring are conducted
 - when monitoring results are analyzed and evaluated
 - documented monitoring information available as evidence for internal and external audits

6.3 Internal Audit Program

6.3.1 Internal Audit Structure and Content

- 6.3.1.1 An **Internal Audit** shall be conducted annually to determine if the **Group Management System** is effectively implemented and maintained. **Internal audits** shall include an evaluation of whether the **Group Management System** meets the requirements of the **AFF Standards of Sustainability, ATFS IMG Certification Standard** as well as the criteria established by the **Group Organization** for processes defined in the **Group Management System**.
- 6.3.1.2 The **Internal Audit** program shall include procedures for the following:
- planning and implementing internal audits including timing, methods, responsibilities, reporting, risk assessment, and consideration of results from previous audits.
 - definition of the audit criteria and scope for each audit;
 - selection of auditors and conducting of audits to ensure objectivity and impartiality of the audit process
 - ensuring that the audit results are reported to relevant group management;
 - retention of documented audit results as evidence for subsequent performance evaluation activities.

6.4 Internal Audit Sampling

- 6.4.1 All **Group Members** and the **Group Entity** shall be subject to **Internal Audits** sufficient to ensure conformance with the **AFF Standards of Sustainability** at the **Group Member** level. **Group Members** may be audited on a sample basis; however, the **Group Entity** shall be audited each year.
- 6.4.2 The **Group Entity** shall define and implement an annual internal audit sampling protocol for **Group Members** to determine the sample size, use of sample categories, allocation of the sample to categories, and selection of **Group Members** to be audited.
- 6.4.3 The **Internal Audit** sample size for **Group Members** shall be calculated based on the number of **Group Members** in accordance with the following:
- The size of the sample should generally be the square root of the number of **Group Members**, rounded up to the upper whole number.
 - Twenty-five percent of the sample should be selected at random.
 - The size of the sample may be adapted up or down by taking into account any one or more of the following:
 - results of a risk assessment
 - results of **Internal Audits** or **External Certification Audits**
 - quality/level of confidence of **Internal Monitoring**
 - use of technologies allowing gathering of information for specific requirements
 - based on other means of gathering information about activities on the ground
- 6.4.4 The **Group Entity** shall define additional sampling requirements in the case of **Group Members** participation in pre-existing organizations or groups.
- 6.4.5 If sample categories are used to amend the standard sample size for **Internal Audits** of **Group Members**, the categories shall be established based on the results of a risk assessment. The sample shall be allocated to the categories according to the results of the risk assessment.
- 6.4.6 Indicators used in a risk assessment for determination of **Group Member** sample categories shall reflect the **AFF Standards of Sustainability**. For each risk indicator used, the conditions for determining risk level (low, medium, high), and the respective consequences for of the up or down adjustments to the **Internal Audit** sampling, shall be defined. The following is a non-exhaustive list of indicators that may be used in the risk assessment.
- Ownership type
 - Size of **Forest Management Unit**
 - Operation, processes, and products of potential group members
 - Deforestation and forest conversion
 - Rotation timelines
 - Biological diversity
 - Recreation
 - Ecosystem services of the forest
 - Dependence and interaction with local communities and indigenous people
 - Available resources for administration, operations, training, and research
 - Governance and law enforcement
- 6.4.7 A risk-based procedure for the selection of specific **Group Members** to be included in the **Internal Audit** sample shall be specified.

6.5 Internal Management Review

- 6.5.1 The **Group Entity** shall conduct an annual **Internal Management Review** to include at least the following:

- a. the status of actions from previous management reviews;
 - b. changes in external and internal issues relevant to the **Group Management System**;
 - c. current status and trends of conformity with the **AFF Standards of Sustainability** and the **Group Management System**, including results of **internal monitoring, internal audits, and external Certification Audits**;
 - d. opportunities for continual improvement.
- 6.5.2 The **Internal Management Review** shall include decisions related to continual improvement opportunities and any need for changes to the **Group Management System**.
- 6.5.3 The **Group Organization** shall retain **Documented Information** as evidence of the results of management reviews.

6.6 External Certification Audits

- 6.6.1 The **Group Entity** shall contract with an accredited **Certification Body** to conduct the independent certification. The accredited **Certification Body** is required to conduct the audit according to accreditation rule #27 under **ANSI American National Accreditation Body**.

6.7 Conformance and Continuous Improvement

- 6.7.1 When an **External Certification Audit** results in a nonconformity, the **Group Organization** shall conduct an analysis to determine its root cause, determine if similar non-conformities exist or could potentially occur elsewhere, and determine the need for corrective or preventative action to eliminate the causes of the nonconformity such that it does not recur or occur elsewhere.
- 6.7.2 In the case that corrective actions are required to address identified non-conformities, the **Group Entity** shall work with the **Group Members** and other appropriate parties to ensure timely implementation of the corrective action and monitor its effectiveness in maintaining conformity.
- 6.7.3 The **Group Entity** shall address any non-conformities reported by **Group Members** that were identified under other **PEFC**-endorsed certificates prior to enrolling in the **IMG Group Certificate**.
- 6.7.4 **Documented information** shall be retained describing identified non-conformities, implementation of corrective actions, and corresponding results of those actions.
- 6.7.5 The **Group Entity** shall keep the **Group Organization's Group Management System** up-to-date, and make changes as needed to maintain ongoing conformance with the **AFF Standards of Sustainability** and the **ATFS IMG Certification Standards**.
- 6.7.6 **Group Organizations** shall identify and implement measures for the continual improvement of the effectiveness of the **Group Management System** and the sustainable management of **Group Member Forest Management Units** included in the **certified area**.

Appendix A: Affected Stakeholder Identification and Communications

Introduction

In the United States, an extensive framework of state and federal laws and regulations pertaining to fair labor practices, environmental impact, tribal sovereignty, and private property rights, is designed to prevent harmful changes in living and/or working conditions for individuals and communities adjacent to lands where forest management occurs. For this reason, the population of **Affected Stakeholders** relevant to **IMG** activities is judged to be minimal. Nevertheless, out of an abundance of prudence, AFF has developed an approach for communicating with potential **Affected Stakeholders** on behalf of all **Group Entities** holding Certificates under **ATFS**. Although **PEFC** requires that only **Affected Stakeholders** are consulted, AFF's approach consults with a much broader population, including individuals and entities that could be identified as interested parties as well as those that are neither interested, nor affected, and therefore may not qualify as stakeholders at all. In this way, AFF ensures the widest possible consideration of individuals and communities with potential to be impacted by **Group Organization** activities through an approach that conforms to **PEFC** requirements while being appropriate for the scale and scope of management activities on family forest lands and forest management context in the United States.

Approach

1. In April of each year, following completion of the previous year's IMG reporting cycle, AFF will conduct an electronic stakeholder consultation outreach using email marketing automation software to all geographies where **IMGs** operate. A sample communication is copied at the end of this document. This shall be distributed to a list including but not limited to:
 - Indigenous tribes and nations
 - Currently enrolled IMG members
 - Individual and communities, not included in the previous bullets, identified as affected stakeholders by IMGs during each annual reporting cycle
2. Any responses received from potentially affected stakeholders will be forwarded to the relevant IMG. AFF will work with the IMG to determine if the individual/community meets the definition of an affected stakeholder.
3. IMGs shall follow up with affected stakeholders within 90 days of receiving notification from AFF.
4. IMGs shall report the date, time, and outcome of follow-up with affected stakeholders in that year's annual report to AFF.
5. Stakeholder information is strictly confidential. Access will be restricted to only necessary members of ATFS staff and relevant IMG staff.

Sample IMG Stakeholder Consultation Letter Template

[Date]

Greetings!

You are being contacted as part of a periodic process to identify and solicit feedback from stakeholders who may be directly affected by sustainable management activities conducted on forest lands certified to the American Forest Foundation's (AFF) American Tree Farm System (ATFS). This consultation is specific to activities occurring on lands included in "[Independently Managed Groups \(IMGs\)](#)."

Stakeholder consultation is a fundamental component of ATFS certification for IMGs. You are receiving this consultation because one or more IMGs manages privately held, certified forest lands in your state.

ATFS is a program of the American Forest Foundation (AFF), a US-based national nonprofit whose mission is to empower family forest owners to achieve meaningful conservation impact. Lands owned by individuals, families, and communities in this system must demonstrate conformance with the [AFF Standards of Sustainability](#) through independent auditing processes to be eligible for ATFS certification. These standards require compliance with all applicable laws governing forestry as well as a range of conservation practices for the protection of wildlife, biodiversity, and landscapes of exceptional ecological, social, cultural, or biological values.

Affected stakeholders are described as individuals or communities who might experience a direct change in living or working conditions caused directly by activities occurring on forest lands enrolled in ATFS-certified IMGs. The overwhelming majority of these lands participate in intermittent, low intensity forestry activities. Examples of such activities that may occur on IMG member properties could include one or more of the following:

- Timber harvest adhering to Standards of Sustainability
- Prescribed burning for wildlife habitat improvement
- Hunting or other types of recreational access/leases
- Targeted control of undesirable vegetation or harmful pests for wildfire prevention and silviculture
- On-the-ground monitoring to ensure forest health and vigor
- Activities which sequester carbon or otherwise mitigate the impacts of climate change, including but not limited to tree planting, extended harvest rotations, and commercial or pre-commercial thinning.

This consultation applies only to IMG member properties. If you believe you or your community is directly affected by forestry activities occurring on one or more IMG member properties, please respond to [online survey] by providing a description of the tax parcel id, name of the property owner, nearest incorporated community to the property in question, county, activities occurring, and how these activities directly affect your living or working conditions. Responses omitting any of the required information cannot be processed. Alternatively, please let us know if you believe you have been contacted in error, or otherwise wish to be removed from our consultation list. The identity of all affected stakeholders will remain confidential except for access by ATFS staff and IMG staff directly responsible for providing follow-up, or unless otherwise specified in writing by the stakeholder.

Thank you for your time and consideration.

Best Regards,

Angela Wells
Director, American Tree Farm System
American Forest Foundation
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Ste 550
Washington, DC 20036