

Complaints and appeals process

1 Scope and purpose

Parties that rely on certification/validation/verification expect to have complaints investigated and, if these are found to be valid, should have confidence that these complaints will be appropriately addressed and that a reasonable effort will be made by the certification body to resolve them. Effective responsiveness to complaints is an important means of protection for the certification body, its clients and other users of certification/validation/verification against errors, omissions or unreasonable behaviour. Confidence in certification/validation/verification activities is safeguarded when complaints are processed appropriately.

This document describes the process for handling complaints and appeals.

2 Terms and definitions

A complaint – Expression of dissatisfaction relating to BM Certification activities, personnel, certification activities, validation or verification activities, certification decisions, certified products, processes, services, or any other matter within the scope of BM Certification activities.

Complaints can be submitted by:

- BM Certification client or any third party involved regarding services provided by BM Certification;
- Any third-party regarding products or services provided by BM Certification client.

A complaint shall be submitted in writing. The complaint must contain the Complainant name and contact information. Complaint shall be accompanied with objective evidence to support each element or aspect of the complaint. Anonymous complaints will be reviewed but no feedback will be provided.

Complainant – person making a complaint.

An appeal - A Clients request to reevaluate the auditor's conclusion/ recommendation/ nonconformity, clarification request, corrective action request or BM Certification statement/decision.

An appeal must be submitted in writing, identifying submitter and subject of the decision/statement, clear description of the appeal and contact information. Appeal shall be accompanied with objective evidence to support each element or aspect of the appeal.

Appellant - person making an appeal.

Applicant (for GMP+ only) - A GMP+ certified company or Certification Body who initiates the Dispute Procedure.

Dispute Committee (for GMP+ only) - the committee appointed for each dispute between a GMP+ certified company and a BM Certification. The committee includes the relevant Certification Manager and the GMP+ coordinator.

GMP+ Dispute Committee (for GMP+ only) - the committee appointed by GMP + International in each dispute between a GMP+ certified company and a Certification Body.

3 Complaints handling process

Complaint is assigned to relevant Certification manager and acknowledgement of receipt is sent within 1 working day. If the relevant Certification manager is involved in the complaint, it's assigned to another Certification manager or Executive director.

Once complaint is assigned, following steps must be taken by assignee:

- Register complaint in Complaint Register and notify Executive director;
- Decide whether the complaint relates to scope of BM Certification activities and, if so, proceed with following steps. If the scope does not relate to BM Certification activities, notify the Complainant.
- Provide an initial response, including an outline of proposed course of action to follow up on the complaint within 10 working days of receiving the complaint;
- BM Certification client in question should be asked to provide any comments on the issues identified in the Complaint and provide any relevant evidences;
- Investigate the issue and gather all required evidences. If necessary, organize an audit to verify the evidences or check the issue during the next planned audit; If follow-up audit organized to investigate complaint – different auditor shall perform it to ensure objectivity;
- Review the evidences gathered and decide on necessary actions. If necessary, an independent committee may be organized for the review. Examination of the complaint shall consider the effectiveness of the certified management system;
- Keep the Complainant informed of the progress in evaluating the complaint, if the process is taking over 20 working days;
- Investigate the allegations and specify all its proposed actions in conclusion to the complaint within three (3) months of receiving the complaint;
- Acknowledge in writing the Complainant when the complaint is deemed closed. Inform about the results of the process, where possible;
- Retain all evidences of actions performed and information received while handling the complaint and update Complaint register;
- Together with the certified/ validated/ verified client and the complainant (if applicable) determine, whether and, if so to what extent, the subject of the complaint and its resolution shall be made public.
- The responses to submitter shall be provided in the same language that is used in the public summary, or the language used shall be agreed with the submitter.

Anonymity of the Complainant in relation to Client shall be retained, where possible. Confidentiality of the BM Certification client information must be preserved, where possible.

Person who has been involved in the auditing relevant BM Certification client shall not be involved in the complaint handling for three years after the audit. Decision resolving the complaint shall be made by or reviewed and approved by person(s) not involved in certification activities related to complaint.

3.1 Complaints relating to ENplus® certified companies

Where a complaint relates to an ENplus® certified company and its conformity with the certification requirements:

- BM Certification shall refer the complainant to the ENplus® certified company as the first instance responsible for addressing the complaint and, with the complainant's permission, forward the complaint to the certified company.
- If the complainant is not satisfied with the outcome of the complaint process of the certified company, BM Certification shall investigate the complaint in accordance with this procedure.
- Received complaints and the results of the complaint process of the certified company shall be considered during surveillance and recertification activities, as applicable.

Where a complaint includes information indicating possible fraudulent, misleading, or other activities inappropriate to the company's certification or the use of the ENplus® trademarks, BM Certification shall investigate the complaint directly without referring it to the certified company as the first instance. Where appropriate, the identity of the complainant and the complaint information shall be treated as confidential.

4 Appeals handling process

Appeal is assigned to relevant Certification manager within 1 working day if the appeal is about auditors'/validators/verifiers conclusion/recommendation/nonconformity/clarification request/ corrective action request. Acknowledgement of receipt is sent within 1 working day. Appeal is assigned to another Certification manager or Executive director if the appeal is about Certification managers decision.

Once appeal is assigned, following steps must be followed:

- Register the appeal in Complaint Register and notify Executive director;
- Decide whether the appeal relates to scope of BM Certification activities and, if so, proceed with following steps. If the scope does not relate to BM Certification activities, notify the Appellant.
- Provide an initial response, including an outline of proposed course of action to follow up on the appeal within 10 working days of receiving the appeal;
- Auditor or Certification manager involved in the subject of the appeal should be asked to provide any comments on the appeal and provide any relevant evidences;
- Investigate the appeal and gather all the required evidences;
- Review the evidences gathered and decide on necessary actions. If necessary, an independent committee may be organized for the review. Make a decision to amend the auditors' conclusion/recommendation/nonconformity/clarification request/ corrective action request or Certification managers decision or to leave it unchanged. If follow-up audit organized to investigate appeal – different auditor shall perform it to ensure objectivity;
- Investigate the allegations and specify all its proposed actions in conclusion to the appeal within three (3) months of receiving the appeal;
- Notify the appellant on the results of the appeals process;
- Retain all evidences of actions performed and information received while handling the appeal and update Complaint register;

4.1 PEFC

If disputes relating to PEFC Forest Management and PEFC Chain of Custody of Forest-Based Products certification cannot be resolved between the certification applicant/holder of certificate and the certification organisation, information about it along with other relevant information shall be submitted to the Association "PEFC Latvian Council". The Chairman of the Board of the Association "PEFC Latvian Council" shall assign a dispute settlement committee of three persons, who shall adopt a decision suitable for all parties involved. When dealing with PEFC RED III related complaints, BM Certification follow the procedure described under PEFC RED III GD 5005 - *PEFC Council complaint procedure for the PEFC RED III scheme*, BM Certification registers on the PEFC RED III database a summary of each complaint handled by Certification Body, together with all documents related to the complaint and its handling process, including any declaration of conflict of interests.

In regards to Latvia PEFC Forest contractor certification, BM Certification ensure that the association "PEFC Latvia" is informed of all complaints and appeals related to the PEFC certification accreditation process that the Certification Organization has submitted to the accreditation office.

4.2 FSC

If the complaint cannot resolve through BM Certification existing procedures or if the submitter disagrees or is dissatisfied with the conclusion or the way complaint has been handled by BM Certification, submitter can refer complaint to ASI, or ultimate to FSC.

For FSC complaints and appeals, the following additional requirements apply:

4.2.1 The aggrieved party shall be given the opportunity to present the complaint or appeal to a person, group or committee that is under BM Certification's contractual or organizational control. Complaints and appeals shall include a clear description of the matter, objective evidence supporting each element or aspect, and the submitter's name and contact information.

4.2.2 All FSC complaints shall be registered in the FSC complaints management system. If the FSC complaints management system is unavailable, BM Certification shall prepare an annual overview of complaints received using the template provided by FSC and submit it to FSC once per calendar year, during the first quarter of the following calendar year, at dispute.resolution@fsc.org.

4.2.3 Responses to FSC complaints and appeals shall be provided in the language used in the public summary certification report, unless another language is agreed with the complainant or appellant. Where requested by the complainant, BM Certification shall retain the complainant's anonymity in relation to the certified organization.

4.2.4 Anonymous complaints and expressions of dissatisfaction that do not meet the requirements for a substantiated complaint shall be recorded as stakeholder comments and addressed during the next evaluation of the relevant organization.

4.2.5 BM Certification shall acknowledge receipt of FSC complaints and appeals, provide an initial response describing the proposed course of action within two (2) weeks of receipt, keep the complainant or appellant informed of progress, and investigate the allegations and specify the proposed actions in conclusion within three (3) months of receipt.

4.2.6 A complaint shall only be considered closed after BM Certification has gathered and verified the necessary information, investigated the allegations, taken a decision on the

complaint and responded to the complainant. The complainant shall be notified when the complaint is considered closed.

4.2.7 If a complaint or appeal has not been resolved through full implementation of BM Certification's procedure, or if the complainant or appellant disagrees with the conclusions or is dissatisfied with the way the complaint or appeal was handled, BM Certification shall inform them of the opportunity to refer the matter to ASI. As the ultimate step, the matter may be referred to FSC.

4.3 RSPO

If the complaint cannot resolve through BM Certification existing procedures or if the submitter disagrees or is dissatisfied with the conclusion or the way complaint has been handled by BM Certification, submitter can refer complaint to RSPO.

4.4 GMP+

If disputes relating GMP+ certification cannot be solved between applicant organization/GMP+ Certified Company and BM Certification based on the BM Certification procedure, then the dispute can be handled in accordance with the GMP+ Document F0.5 *Dispute procedure*.

A dispute can be initiated by Applicant organization/GMP+ Certified Company or BM Certification by submitting the Application in sixfold by registered mail to the GMP+ International Secretary. The address details of the Secretary are published on the website of GMP + International (www.gmpplus.org).

Detailed procedure for the submission, receipt, and review of Application; handling of disputes and activities of the GMP+ Disputes Committee; deposit payment; respondent responsibilities; hearings; issuance and correction of Binding Advice; and the costs of the Disputes Procedure described in GMP+ Document F0.5 *Dispute Procedure*.

4.5 VVB

Same complaints handling process will be followed for the dispute handling related to validation and verification body.

5 Results

If as a result of processing appeals or complaints, errors and mistakes in the actions of BM Certification are identified, without undue delay the causes of the detected non-conformities shall be investigated, and necessary corrections and corrective actions shall be taken. Results shall be documented in Complaint Register by Certification Manager responsible for investigation of appeal or complaint.

BM Certification shall communicate the results of the complaint's resolution to the relevant ENplus® scheme management.

6 Final provisions

BM Certification when signing the contract on certification/validation/verification service provision, shall inform the Client in writing about the order of appeal submission and conflict resolution.

BM Certification shall ensure that decisions on complaints and appeals do not result in any discriminatory actions against the submitter. Moreover, BM Certification will retain the anonymity of the submitter in relation to the client, if this is requested by the complainant.

7 Change history:

Version	Summary of Changes	Issue date
V1	Review of all requirements	Mar 2023
V2	Added GMP+, ENplus® requirements	Apr 2023
V3	Added result registration, auditor rotation for investigation	May 2023
V4	Added information on possibility to complain to RSPO	Aug 2024
V5	Reference to PEFC RED II complaint procedure Added information on VVB dispute process	Feb 2025
V6	Added RED III Defined the members of the Dispute committee (GMP +)	June 2025
V7	Added ENplus® scheme specific complaint handling requirements. Formatting changes.	Aug 2026
V8	Aligned FSC complaints and appeals requirements with FSC-STD-20-001 V5-0 Clause 7.13.	Sep 2026