Social and Environmental Aspects of the Forest Management Certification Process

A discussion of social assessment components in South Africa

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Instruments for sustainable private sector forestry, South Africa

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About this report: This report is one of a series prepared as part of a collaborative research project on instruments for sustainable private sector forestry in South Africa. The reports in this series are listed below.

Instruments for sustainable private sector forestry, South Africa – report series

Overview and synthesis

- Mayers, J., Evans, J. and Foy, T. 2001. *Raising the stakes: impacts of privatisation, certification and partnerships in South African forestry*. This report draws on all the studies below and widespread consultation in South Africa. It analyses the impacts to date of privatisation, certification, outgrower schemes and company-community partnerships and presents conclusions and a set of options and next steps for all the main stakeholder groups.

Redistribution of opportunities and assets in forestry

- Khosa, M. 2000. *Forestry contracting in South Africa*. This study of trends in outsourcing and contracting in the South African forest industry seeks to deepen understanding of the national context within which contracting is an increasing practice, and examines possible options for outsourcing.

- Heyl, L., von Maltitz, G., Evans, J. and Segoale, R. 2000. *Issues and opportunities for small-scale sawmilling in South Africa: an Eastern Cape case study*. This report describes the scale, structure and market niche of the small sawmilling subsector, with a focus on the Eastern Cape Province.

- Horn, J. 2000. *The role of small-scale sawmilling in household and community livelihoods: case studies in the Eastern Cape*. This study focuses on the livelihoods of small-scale sawmillers in the Eastern Cape, using a case study approach.

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- Scott, D. 2000. *Environmental aspects of the forest management certification process*. This report by a member of FSC certification audit teams examines the audit inspection instrument and provides commentary on how it is used.

- Clarke, J. 2000. *Social and environmental aspects of the forest management certification process: a discussion of social assessment components in South Africa*. This report, drawing on audit experience, tackles the ability of FSC certification and the certification process to improve the wellbeing of workers and communities dependent on plantations.

- Hamman, J. 2000. *Forestry certification: social aspects*. Also by a member of FSC inspection teams, this report analyses the composition and focus of the audit teams and highlights issues which can compromise the positive impact of certification.

- Dunne, N 2000. *The Impact of Environmental Certification on the South African Forest Products Supply Chain.* This study traces the route of FSC certified timber from mill to market, seeking to understand the impact of certification on traders and retailers in South Africa and the UK.

- von Maltitz, G. 2000. *The impacts of the ISO 14000 management system on sustainable forest management in South Africa*. This is a study focussing on one company's decision to adopt ISO accreditation, comparing the impacts of the ISO system with those of FSC certification.

- Crawford Cousins, C. 2000. *The impacts of stakeholder consultation in the FSC certification process on sustainable forest management in South Africa.* Focussing on the Stakeholder consultation process within FSC certification, this report highlights key assumptions about the efficacy of consultation.

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- Ojwang, A. 2000. *Community-company Partnerships in forestry in South Africa: an examination of trends*. This is a broad overview of types of partnerships in Southern Africa, with comparisons between forestry and other sectors.

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- Sisitka, L. 2000. *Private sector community forestry partnerships in the Eastern Cape: the Lambazi case study.* This case study examines the relationships between stakeholders and actors in a corporate-initiated scheme

- Cocks, M., Matsiliza, B. and Fabricius, C. 2000. *Private sector community forestry partnerships in the Eastern Cape: the Longweni woodlot case study*. This report examines community preferences and options for the use of a woodlot in the context of opportunities provided in the forest restructuring process.

- Sisitka, L. 2000. *Private sector community forestry partnerships in the Eastern Cape: the Umzimkulu case study*. This is a study of a corporate-community joint venture project in a part of the province that has good afforestation potential.

- Cocks, M., Matsiliza, B. and Fabricius, C. 2000. *Private sector community forestry partnerships in the Eastern Cape: the Manubi woodlot case study*. This study examines issues around partnerships and joint forest management around a state-conserved indigenous forest

- Ham, C. 2000. *The importance of woodlots to local communities, small scale entrepreneurs and indigenous forest conservation*. Comparing issues and opportunities arising around two woodlots, this study highlights the relative importance of government-planted woodlots to different community interest groups.

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1. Introduction

This paper is a review and analysis of my experiences with FSC certification auditing in South Africa over the past three years. I was contracted as a "social specialist" by SGS-Forestry for 4 Main Assessments (all except one were for large forestry companies) and one surveillance visit.

The paper begins with an overview of the learning process I went through in developing an approach and methodology to use during assessments. The constraints and difficulties I faced are highlighted. In the next section of the paper, I analyse these experiences through examining FSC certification in the context of an overall process aimed at ensuring adequate social standards are met and maintained within a forestry enterprise. I then look at my experiences under four main themes that are central to the overall study of which this is a part. Key issues pertaining to each are highlighted, and recommendations made.

2. Overview of my approach to assessment of social issues in FSC certification

When I first became involved with FSC certification, I interpreted my role as social specialist as being to identify key social issues in the company, and feed this insight to the Lead Auditor who had the auditing skills and the in-depth knowledge of the Qualifor checklist. Thus, I focused on the identification of key issues, rather than on the direct auditing of compliance against the Qualifor checklist. Over the period of assessments, I developed and refined an approach to the identification of key social issues and concerns prior to and during the main assessment.

Firstly, I developed a simple classification of "social stakeholders": own employees; contractors; tenants; neighbouring communities (some individuals may be in more than one category, for example a tenant could also be an employee). From my prior knowledge of the Industry, as well as from a summary of the main relevant legislative requirements, I then developed a checklist of important topics/potential issues/key requirements to investigate for each of these main stakeholder groupings. This checklist provided a guide for investigation and questioning during the assessment.

Prior to each Main Assessment I identified people/organisations who would be in a position to represent the views of these stakeholders on the issues identified, as well as raise other issues. These included Union organisers, worker representatives, NGOs working with rural communities and rural community representatives etc. These groups would be contacted by phone, interviewed, and where appropriate, appointments were made for the week of the main assessment (this process is discussed further in section 4.2 on stakeholder consultation). During the main assessment I would meet with these key stakeholder representatives, review company reports and other documents, and hold discussions with key members of staff. By the eve of the last day I would usually have a clear idea of what was going on in the company under the various headings, and what the key social issues were.

I then had to translate these key issues into a set of single sentence Corrective Action Requirements (CARs) in preparation for the Closing Meeting the next day. CARs have to be formulated in terms of the criteria and indicators in the Qualifor checklist. The challenge was to find a requirement either in the checklist or national legislation[1] that could be used to adequately express the issues identified, in the form of a CAR. This was always a very challenging and difficult task, as the indicators and standards in the Qualifor checklist (levels 3 and 4) are global, and have not been formulated with the South African situation in mind. Likewise the structure

[1] Criterion 1.1. in the Qualifor checklist covers the need to adhere to National Statutes

and logic of the Qualifor checklist was completely different to the way in which I had structured my investigation. The other problem with approaching the audit in this way was that some of the requirements of the Qualifor checklist were not, in the initial assessments at least, adequately investigated. A consequence of this was that inconsistencies could arise in CARs given to companies, a certain issue might be picked up one main assessment and not in another, because it was not investigated directly, and did not emerge in the course of identifying issues.

Over the course of a few Main Assessments, I gradually modified and improved my methodology, by a) aiming to find a way to better link the South African issues with the Qualifor checklist, and b) ensuring everything in the checklist was covered during an assessment. The SGS staff, particularly Neil Judd, were supportive, and at one point commissioned me to refine and write up the draft checklist I had been developing so that it could be used by SGS as the basis for auditing social aspects in future. Later on, when Johann Hamman began to work on FSC assessments as a social specialist, he assisted to further refine this checklist, particularly on the land and labour legislation.

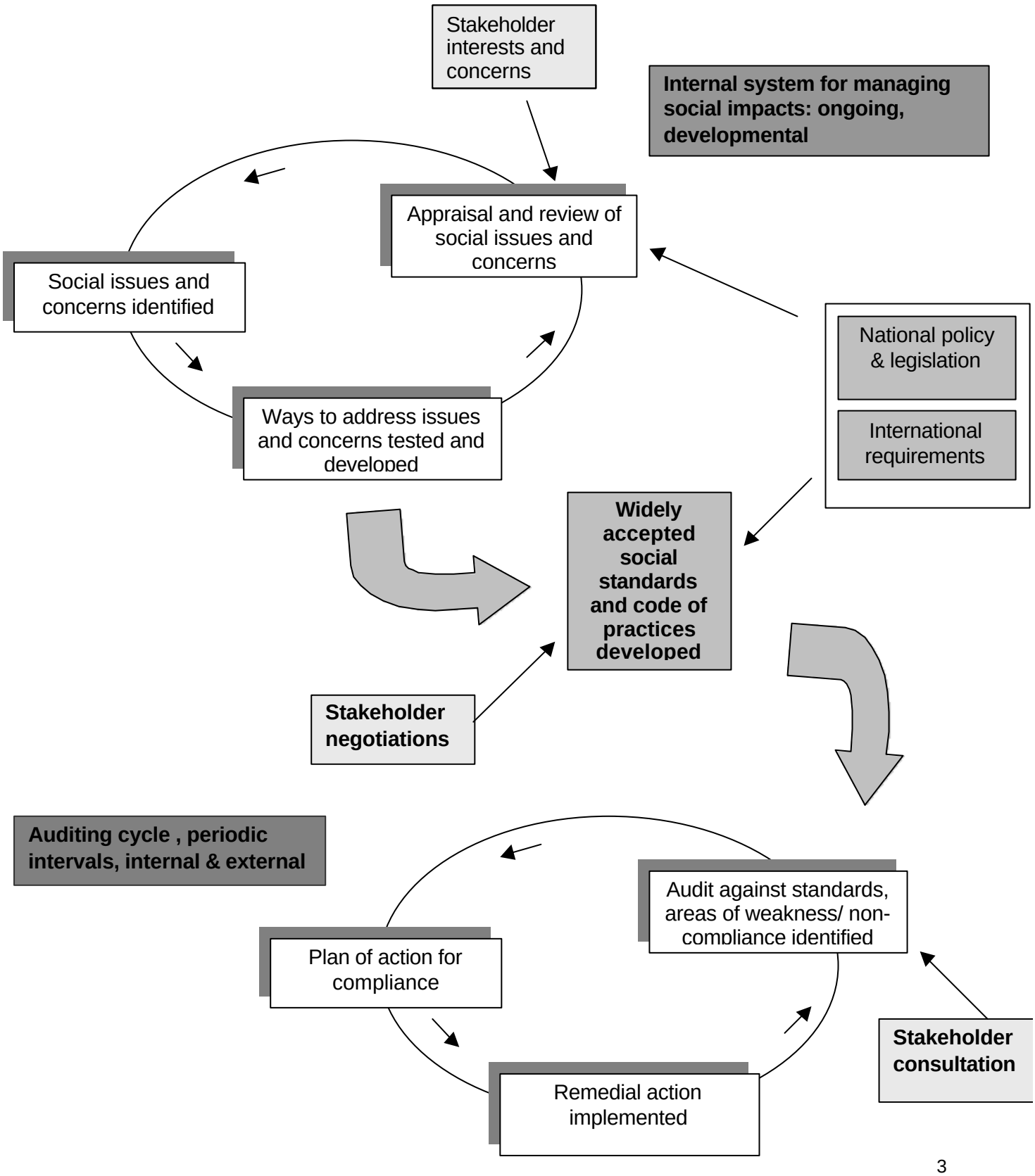
However, I have not finalised the checklist, mainly because I see that this is merely a temporary substitute for what is *really* required: a set of standards and code of practice governing social aspects of industrial forestry operations in South Africa, developed/negotiated by all stakeholders. This is a theme that I return to a number of times in this paper.

A number of critical issues regarding social assessment in FSC certification in South Africa arise from the experiences discussed above. These are discussed in the next section.

3. Social Assessment in FSC certification: an overall analysis of constraints and issues

In order to make sense of my experiences and to provide some insights into social assessment, I examine the role and function of certification within a wider process aimed at ensuring adequate social standards are met and maintained within a forestry enterprise (Figure 1).

Figure 1 : Process for ensuring adequate social standards are met and maintained within a forestry enterprise



What I have attempted to illustrate in the diagram is that certification is a part of an overall process for ensuring that social standards are met and maintained within a forestry enterprise. There is need for an internal system for managing social impacts within the organisation (top cycle in the diagram), in which social issues are identified and ways to address them are tested and developed on an ongoing basis. This provides the basis for a set of standards, and code of practice to be negotiated (core of the diagram). Only *then* is there the necessary basis for auditing (lower cycle in the diagram). My contention is that internal systems for managing social impacts and the social standards and code of practice elements of the process have not been adequately developed in the South African forest industry, and therefore the auditing cycle is severely compromised. Ideally, certification auditing should confine itself with the lower cycle of the diagram, in which the task of the auditor or assessor is to check compliance with a set of standards and established code of practice. However, where these standards are lacking the task of the assessor becomes confused with other elements in the overall process.

This understanding provides the basis for a discussion of key issues arising from my experiences of social assessment, as described in section 2. Key issues are presented and discussed below.

- **The mismatch between the Qualifor checklist and the *real* social issues and concerns**

There are two parts to this problem. Firstly, the Qualifor checklist does not adequately reflect the real social issues in the South African forest industry. Secondly, unlike environmental issues, there is no widely accepted set of standards and code of practice that has been developed by the industry, which could make up for the limitations of the Qualifor checklist. As a result, If one were to strictly audit against the Qualifor checklist it is likely that the key issues would not be addressed. If one approaches the assessment from the angle of identification of key issues, it is then difficult to use FSC certification as a tool to address these issues. Clearly there is a need to find a way of better matching the checklist with key social issues. How can this be done?

- **Modification of the Qualifor checklist** (or that of any other accredited certifier). SGS was keen to modify their checklist to better reflect the key issues, but this can only be done at the level of indicators and standards. Principles and criteria are set by the FSC and cannot be changed. It is quite difficult to maneuver within such a rigid framework. The other option is for South Africa to develop country-specific FSC indicators, but the same constraints would apply.

- **Developing an "social" equivalent to the South African code of practice in harvesting**. This would automatically be used in conjunction with the Qualifor checklist, and would be an effective way to ensure the main issues are addressed. Most important of all, such a code of practice would (ideally) have the buy in and support of forest companies and key stakeholders: it would be widely accepted code of conduct, set of standards, or even agreed ways of approaching and addressing key social issues in the Industry

- **Principles, criteria and indicators of SFM as required by the 1998 National Forests Act**. This is another vehicle for achieving the same result as a code of conduct. It is a legislative requirement and is already underway, and so probably the best solution.

- **There is a lack of recognition of the importance of social issues, and a lack of commitment to and ownership of a process of ensuring adequate social standards are met, within forestry companies**

- **Systems to identify and address social issues are inadequate**

- **There is a lack of practical experience with how to address social issues**

All the above are components of the upper cycle in the diagram, which, I contend, is weak in forest companies in South Africa. Ideally, the company should have in place a system for managing the key social issues identified, and in the process develop the necessary skills and approaches for doing so. These weaknesses have important implications for certification:

i) The developmental / learning aspect is central to the overall process. It is through this that companies develop practices, approaches, tools, methods and the experience to address social issues. These in turn are the basis for a code of practice, for the setting of standards and indicators. It is difficult to assess compliance with legislation or with principles and criteria without agreement on *how* these can or should be put in practice.

ii) The contribution certification can make to promoting learning and positive change within an organisation depends on an internal commitment to, and systems for, addressing the limitations identified during an assessment or audit. This is further discussed in section 7 below.

The issues discussed above provide an overall context for the more detailed discussion of social assessment according to the themes provided in the terms of reference for this assignment.

4. Theme 1 : The Assessment Team

4.1 Team Composition

The team for Main Assessments comprises the following members:

- a lead auditor who has been trained in auditing skills, the FSC forestry certification process and in the SGS qualifor checklist. In the past this has always been someone with international experience from SGS Forestry in the UK, but more recently SGS has trained a South African (Pieter Viljoen) to take over as lead assessor in South Africa
- In the earlier Main Assessments that I was involved with, there would also usually be a second team member from UK SGS office, with international experience in certification auditing, and their main area of expertise being the environmental aspects.
- Two local specialists, one on social aspects and one on environmental aspects.

Issue: There are always at least two people on a Main Assessment who focus on the environmental aspects, yet when it comes to social aspects, there is only one person. Some guidance is provided by the Lead auditor, but in my experience, s/he expects the social specialist to take over these aspects of the checklist.

4.2 Social specialist: skills and knowledge areas required

The types of skills required depend on how well the system is set up: if there are clear standards and an established code of practice, assessing compliance with these could be fairly straight forward. The absence or lack of clear standards and codes of practice makes the auditors task much more challenging, as s/he has to be able to apply and interpret relevant

legislation, and re-interpret the requirements of the checklist for the local situation. This requires familiarity with a very wide range of different fields, most of which are in a state of extreme flux at the present time in South Africa. These include the following:

Land and labour policy, legislation and acceptable practice: Land and labour issues are critically important social concerns in the Forest Industry. Since 1994 there has been a complete revision of State policies and legislation in these areas, which directly impacts on the Forest Industry. There are 6 relevant Acts – the majority of which have been passed since 1994, governing labour relations and practices in the Industry. In addition there are 4 new Acts which apply to tenure rights of employees and residents on forestland. In addition to having a good knowledge of land and labour policy and legislation it is also important to have some experience in what to look out for in checking compliance. One needs to know something about the approaches being developed and problems being experienced in the implementation of policies and legislation. This is often very specialist knowledge.

Contractors and retrenchments: To my mind this is the area of greatest concern when it comes to social sustainablilty of the forest industry in South Africa, and for this reason I have singled it out from the general requirement of checking compliance with policy and legislation. I think it is important for the social specialist to have some degree of knowledge and understanding of global trends towards outsourcing, and the trends and practices in the Forest Industry in South Africa. In addition, it is necessary to have a clear understanding of what the requirements are, a) in terms of the labour legilsation and b) in terms of the Qualifor checklist. It was only after I had been involved with a number of assessments that I developed a clear set of requirements based on these two sources, which could be used as the basis for auditing. The issues raised by the trend to outsourcing are further discussed in section 6 below.

Housing: Housing policies for employees is another area of importance in South Africa given the legacy of migrant labour, housing shortages, tenure insecurity and the practice of providing workers accommodation on plantations. It is important to have an understanding of the key issues and concerns as well as emerging housing policy and provisions of Government. It is also useful to have some knowledge of how government policies and provisions are being put into practice generally and by the forest industry.

Stakeholder consultation and corporate social responsibility: These are important aspects of the qualifor checklist that need to be assessed by the social specialist. Both require interpretation: what constitutes acceptable practice is not spelt out in the checklist, and therefore requires some familiarity with national accepted practice and standards. A good example is 4.1.5 which is: “support provided for local infrastructure, facilities and social programmes at a level appropriate to the scale of forest resources” . What *is* an “appropriate” level? This again raises the issue, discussed in more detail in section 3 above, regarding the lack of agreed standards and code of practice.

4.3 Team work

The idea is that the local specialists work with the SGS team members who have experience in the auditing side, all work closely as a team throughout the assessment, meeting every evening to review the day, and to identify priorities for investigation the next day. The evening before the closing meeting on the last day is when the final decisions are reached by the team about what CARs to raise. By that time there has usually been quite a lot of discussion of the key emerging issues, time to gather objective evidence and refine the CARs. On the whole this process works very well. The main limitation I have found is the lack of understanding that the rest of the team members have about social issues. As a result the tendency is for the social specialist to work

alone, whilst the others work more closely as a team. This can place a very high level of responsibility on one person, who is not required to have any prior training or experience in auditing per se.

4.4 Changing team members

Dave Scott has commented on this in detail. From the point of view of the social assessment the main problem, again, is the lack of agreed standards and code of practice. Assessors have a lot of interpretation to do, and this has implications for consistency across assessments. On a more practical note, a lesson I learned on my first surveillance visit is the importance of wording CARs in such as way as to make it very clear what exactly is *required* to close it out. Although this sounds like it should be obvious, given that a CAR is a Corrective Action Requirement, I found that I and others before me had been writing CARs which were worded in such a way as to be unclear as to exactly what was expected in order to close it out. This is partly due to lack of experience on the part of assessors, but can also be attributed to the more pervasive problem of the lack of agreed standards / accepted practice when it comes to social aspects.

5. Theme 2: The Consultative Process

5.1 Stakeholder consultation

As has already been observed by Dave Scott and the IIED team, the standard process for stakeholder consultation may not be adequate when it comes to the "social stakeholders". The limitations of using the company stakeholder lists to identify stakeholders has already been highlighted by Dave: these are not adequate and it is necessary for the social specialist to spend some time putting together a more representative list. The next step is to contact stakeholders by fax, using a standardised format that explains the overall process and aims of certification and asks for responses by fax within the period of a week or two. There are a number of problems with the faxes when it comes to "social stakeholders" including:

- The standard fax does not use plain English, it is difficult to read and to understand, especially for readers with low levels of English language and literacy skills.
- It is often very difficult to reach certain stakeholders (such as rural community representatives) by fax.
- Many of these stakeholder groups have had little or no prior exposure to certification, and as a result they are likely to put the fax to one side and forget about it, especially if they are under a lot of pressure with other more immediate and burning issues (Trade Union Officials for example). This is different to other stakeholder groups, for example Environmental NGOs, who are most likely to be aware of certification and how to make best use of it to voice their interests.

When contacting stakeholders for whom these difficulties are likely to arise (often the case for the "social stakeholders") it is necessary to follow-up the faxes sent with phone consultations, and where necessary, with face to face interviews during the actual assessment period. This is the procedure that I followed for all of the Main Assessments I was involved with initially. I was allocated time in my contract to do this prior to the assessment itself. Although there were still limitations, this approach was much more effective than the standard fax-and-wait approach. More recently it seems that there has been a change: the Lead Auditor has taken over the whole process of identification of stakeholders and sending out of faxes. I think this is because the Lead Auditor is now South African based and therefore the thinking was that s/he would be in a position to carry this out, unlike the past when the lead auditor was based in the UK. The length of audits has also seems to have been reduced, and as a result there is now less time for in-depth interviews with stakeholders during the assessment. The reduction in time may also be

because all the main assessments for the big forestry companies have now been done, and main assessments of smaller operations are done in two or three days.

Another important need is to raise the awareness and understanding that Unions and other groups representing "social" stakeholders have of certification. This relates to the concerns discussed below about the imbalance between workers and management in the certification process.

5.2 Consultation within Forest Companies

During the social assessment, it is obviously important to speak with all levels of employees in the company. As Dave Scott pointed out however, it is often difficult to communicate well with worker-level staff, owing language barriers and possibly a fear of reprisals. Another important source of unintended bias is that inevitably, the audit team gets to spend a disproportionate amount of time in the company of senior to middle management, who have the overall responsibility of organising and arranging all aspects of the assessment. Management-level staff host the audit, and usually accompany the audit team throughout the period of the audit, including evenings when travelling away from the headquarters, providing a great deal of opportunity for informal as well as formal discussions. Contact with workers, in contrast, is usually limited to discrete and often fairly formal interviews, in which there is often reliance on a more senior staff member to translate. The consequence is that the assessment team is exposed much more to the perspectives and concerns of senior to middle management than to those of workers or their representatives. Another aspect of this problem is the attendance at the closing meeting. It should be explained that the closing meeting is the most loaded and significant event of the entire assessment or surveillance visit. This is when the team reads out the CARs, clarifications may be asked for, and they are then usually signed by the company management. As with the rest of the audit process, in my experience, the attendance at the closing meeting is always restricted to senior and middle management employees, the majority of whom are white and male

There are two issues here:

- Only management level staff have the chance to query and challenge the findings. Although in my experience the team very rarely backs down on a CAR, the opportunity is there. When formulating CARs, assessors are aware that they will have to adequately defend each and every one in front of a large crowd of often hostile and aggressive (white, male) managers! [2] There is no representation of workers, tenants or neighbouring communities present to do the same. So again, this could potentially be a source of unintended bias in the formulation of CARs.

- Being marginalised from the auditing process from beginning to end prevents other stakeholders from using Certification to advance the concerns and interests of their members. Certification is a potentially very powerful tool for positive change, for example in improving working conditions, but if worker representatives are marginalised from the process it will be difficult for them to take advantage of these opportunities.

6. Theme 3: The Decision Making Process

[2] Minor CARs are not usually challenged or queried much, but a major CAR can (certain companies are worse than others) lead to a fierce battle of resistance, gloves off, in the closing meeting.

6.1 Procedure for communicating and closing out CARs

Dave Scott has described the process for communicating CARs, procedures for close out and how decisions are reached about whether a CAR should be a major or a minor. I have touched on this in the context of social assessment in the discussion on CARs below.

6.2 CARs given for social aspects

I do not have a full record of all social CARs given on FSC assessment in South Africa so the points here are based on the assessments I was involved with. The biggest issues were consistently around the move to outsourcing in the big companies. In my opinion, SAFCOL is the only company that has a responsible approach to outsourcing. As discussed above, the difficulty was to attach very tangible concerns and problems to an indicator in the Qualifor checklist. At one stage I even considered using Principle 4, but the Lead Auditor said this could not be done, that CARs can only be given in terms of criteria or indicators! It was also difficult to get clarity on the legal position regarding outsourcing, with much of the legislation being very new there is a lack of experience in application of the law. These are the kinds of issues that end up in front of the CCMA (The Commission for Conciliation, Mediation and Arbitration), and I felt far from qualified to make judgement on them myself. With the help of Johann I have finally developed a set of minumum requirements for outsourcing, based on legislation and the Qualifor checklist. A number of things I had on the checklist had to be dropped because they could not strictly be justified in terms of legislation or the Qualifor checklist. This again points to the need for an Industry-wide standard and code of practice to be agreed on. More than this, there is a need for this issue to be considered globally, as it will be problematic to set a standard in South Africa which differs from that applied elsewhere. It would be useful for the IIED team to investigate what initiatives there are on a global scale (for example the ILO International Union of Forestry Workers) to address the negative impacts that globalisation and outsourcing are having on forestry workers, and the implications these have for the way in which certification is carried out. To my mind, the trends in labour conditions are in direct contravention of Principle 4. This of courses raises the fundamental issue about certification: what interests are ultimately driving the process: is it corporate business in pursuit of profits, or consumers' genuine commitment to social equity and fair labour practices?

A major CAR relating to social issues was given recently, and it was one on outsourcing. If there had been more clarity earlier on the key requirements it is likely that other companies would have got majors for issues related to outsourcing. Majors can still be given during surveillance visits, much more easily in fact, as the definition of a major in the context of a surveillance visit is any minor which has not been closed out.

Other topics of concern which have been given CARs include: poor performance with respect to affirmative action and equal opportunity; lack of investment in resident and neighbouring communities; lack of adequate stakeholder consultation; poor standards of worker accommodation.

7. Theme 4: The Learning Process

In order for learning and continual improvement to take place there needs to be systems in place for this within the company, as shown in Figure 1. The audit or assessment cycle can only contribute in so far as it signals whether or not standards are being met. The company and its senior management staff need to take responsibility for and be committed to addressing non-compliances identified. In the absence of this, certification only results in a window dressing approach. Without real commitment and their own internal system, companies are likely to respond to the market imperative of certification by trying to outwit, confuse and trick the

auditors and the system as a whole. In these cases, company staff are likely to be highly defensive, try to hide or deny the existence of problems. In some cases deliberately mislead the assessors, and then finally argue fiercely against any major CARs given! Under these circumstances it is very difficult for certification to feed into a learning process. To be fair, many employees including managers have not been used to having external assessments, and it is understandable that it may be difficult to adjust to in the beginning.

Even under ideal circumstances where there is the necessary commitment and good initiatives being taken, the role certification plays in promoting learning is limited by the nature of the process and the way it is carried out. To start with, assessors are not supposed to get into any level of detail regarding the "how" – their role is limited to the identification of non-compliances, and formulation of CARs. The role of "assessor" is not supposed to be mixed with role of "consultant" (Dave Scott and I were often reprimanded by a lead auditor we worked with for behaving like "consultants" instead of assessors when we wanted to talk with staff about how to address CARs!). This idea stems, I think, from the concern about conflict of interest inherent in playing both roles in one company, but to my mind it would not arise unless one were contracted by that company specifically to give them advice outside of the assessment. The principle of separating auditing from "consulting", i.e. directly assisting with the learning process in the company, permeates the design of the entire process. There is no place or space in the process to feed back to staff insights gained about their programmes and approaches, to discuss with them ways to move forward. Feedback is limited to the CARs read out in the closing meeting, and the report that gives very little detail. As already mentioned above, the very nature of the process can be quite alienating, causing staff to try to hide or conceal things, rather than feel free to debate and learn with the assessors. Competition for "good image" amongst companies may exacerbate this.

In conclusion, my impression is that the role certification can play in promoting learning is limited to

- providing feedback on how well processes and approaches are working, i.e to feed into *internal* processes of learning and development
- communicating information about international standards and acceptable codes of practice
- providing the impetus for companies to take the need to address issues of sustainability seriously