American Tree Farm System®
2021 Independently Managed Group (IMG) Certification Standards

Introduction

The American Tree Farm System ® (ATFS) Independently Managed Group (IMG) Certification Standards 2021 contain the requirements for the implementation by, and independent certification of, group organizations that manage a number of group member properties under one centrally administered program. The Group Organization holds the single certificate on behalf of the Group Members. This process is referred to throughout the document as “group certification.”

The ATFS IMG Standards take effect on January 1, 2021, for all new Group Organizations. For Group Organizations with current ATFS IMG certificates, 2021 will be an implementation year during which adjustments will need to be made to the program to bring the IMG into conformance with the requirements contained herein.

Generally, the Group Organization administers the overall functions of the group and coordinates certain activities, such as:
• ensuring conformance to the AFF Standards of Sustainability,
• administering entry and departure of members,
• maintaining records and reporting,
• conducting ongoing monitoring,
• managing the group certification process.

Reference Documents

The 2021 version of the ATFS 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, policies and guidelines that should be followed to effectively achieve independent certification and conform to overall ATFS requirements.

Those standards, policies and guidelines include:
AFF 2021 Standards of Sustainability for Forest Certification and Guidance
ATFS Eligibility Requirements
ATFS Logo Use Guidelines
ATFS Signage Use Guidelines
ATFS Group Certification Reporting and Invoicing
AFF Disputes and Appeals Procedures
Types of Group Members

ATFS has identified three categories of Group Members for purposes of completing annual reporting and submission of annual fees to ATFS. Group organizations seeking certification through the ATFS IMG program must categorize Group Members into one of three categories listed below.

The designation of the three categories of Group Members is for the exclusive purpose of ATFS annual reporting and fees. Reporting forms are released to Group Organizations at the beginning of each reporting year and will detail the reporting requirements for each category.

The three types of Group Members are:

**Category 1** Group Members retain final decision-making authority for management activities to be conducted on their property. This category may include individuals, family ownerships, LLCs and other similar entities. The Group Member may, through contract or other agreements, utilize the Group Organization’s services for some or all management activities. Group Members may also participate in group management plans where management decisions and responsibilities are shared between the Group Organization and the Group Members.

**Category 2** Group Members have knowingly and affirmatively delegated full management responsibility for implementation of the AFF Standards to the Group Manager. Category 2 properties are under aggregated ownership as part of an investment fund portfolio. The Group Organization as the management consultant assumes overall operational management responsibility and performs all of the functions required for conformance to the AFF Standards. This category may include properties that meet the ATFS eligibility requirements and are managed by a Timber Investment Management Organization (TIMO). Category 2 Group Members include those entities referred to as Aggregated Management Groups (AMGs) in the ATFS Eligibility Requirements and Guidance.

**Category 3** Group Members are government entities. The property owner may have knowingly and affirmatively delegated full or partial authority for management and decision-making to the Group Manager, or the owner may retain all management authority. The Group Organization may perform some, or all, of the functions required for conformance to the AFF Standards. Examples of Category 3 members are: a local municipality, a public grade-school, a public university, a publicly owned watershed authority, a tribal government, a state or federal agency.
Section 1. Group Organization Administration

1.1 Legal and General Requirements
   a. The Group Organization must be a legal entity competent to sign agreements with Group Members and to enter into binding contracts with certification bodies and other outside entities.
   b. The Group Organization must identify Group Members’ category.
      I. The Group Organization must document the group member category (see above section on Group Member types).
      II. The Group Organization must describe roles and responsibilities of the Group Manager and Group Members with respect to forest management decisions and actions with respect to the implementation of the AFF Standards (e.g. plan development, harvesting, monitoring, etc.).
      III. The Group Organization must have a written commitment to sustainable forestry and conformance to the AFF Standards.
      IV. The Group Organization must ensure Group Members have a written commitment to sustainable forestry and conformance to the AFF Standards of Sustainability.

1.2 Roles and Responsibilities
   a. The Group Organization must adhere to ATFS eligibility requirements and may further define membership parameters for its Group, if desired.
   b. The Group Organization must designate a Group Manager(s) who is responsible for overseeing all of the administrative details of ATFS Group Certification and for ensuring compliance with all applicable requirements.
   c. The Group Organization must incorporate a Group Management System to verify that all Group Members are subject to annual internal monitoring.
   d. The Group Organization must document Group Management Systems and verify responsibilities between the Group Organization and Group Members.

1.3 Group Membership
   a. The Group Organization must inform Group Members of any and all fees associated with administration of the Group, if any, when they join the Group Organization.
   b. The Group Organization must hold the ATFS Certificate on behalf of the Group Members.
   c. The Group Organization must follow the ATFS logo use guidelines and ensure proper use of promotional claims about the Group Certification.
   d. The Group Organization must issue a document to each Group Member that confirms the Group Member participation and coverage by the scope of the third-party certificate.

1.4 Group Member Entry and Departure
   a. The Group Organization must 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®. Under this requirement, category 1 Group Members must be notified to the individual landowner level and category 2 Group Members must be notified to the portfolio level.

b. The Group Organization must define and administer a procedure for admitting Group Members.

c. The Group Organization must maintain a procedure for expelling Group Members if they do not meet the requirements of the AFF Standards, and are not willing or able to take appropriate corrective action.

d. The Group Organization must maintain and update the membership list and ATFS database to reflect entries and departures of Group Members from the Group Organization.

1.5 Dispute Resolution

a. The Group Organization must have a procedure for addressing and resolving disputes regarding conformance with the AFF Standards between and among the Group Members and the Group Organization pertaining to Tree Farm certification.

b. The Group Organization must follow and conform to the AFF Dispute Resolution Policy and assist ATFS in resolving any such complaints.

1.6 Maintaining Records of Group Members

a. The Group Organization must maintain internal Group Member records and provide updated information on a regular basis to the ATFS database.

1.7 Group Organization Management

a. The Group Organization must have a procedure for documentation of any change in Group organization structure or protocol.

Section 2. Requirements of Participation in the American Tree Farm System®

2.1 Access to the AFF Standards

a. The Group Organization must make the AFF Standards of Sustainability for Forest Certification accessible to Group Members.

2.2 Conformance with AFF Standards

a. The Group Organization must have a procedure for evaluating conformance with AFF Standards prior to property enrollment under the group certificate.

b. Management Plan:
The Group Organization must ensure that each Group Member either has an individual management plan or is covered by a larger group management plan where responsibility for management has been delegated to a Category 2 with a qualified natural resource professional.

2.3 Eligibility

a. The Group Organization must have a procedure for evaluating eligibility according to the ATFS Eligibility Requirements prior to property enrollment under the group certificate.
Section 3. Internal Monitoring and Reporting

3.1 Ongoing Monitoring

a. The Group Organization must establish and maintain a procedure and schedule for conducting annual monitoring of conformance of Group Members with AFF Standards.
b. IMG inspectors of the Group Organization conducting internal monitoring must have completed the current ATFS Tree Farm Inspector training course.
c. The Group Organization must review conformance to the AFF Standards and document the relevant findings.
d. Where a non-conformance is identified during annual monitoring, the Group Organization must document the non-conformity and work with the Group Member and other appropriate parties to take corrective action.
e. The Group Organization must ensure implementation of the corrective action and monitor conformity as part of the regular schedule of internal monitoring.
f. The Group Organization must implement an annual monitoring protocol in accordance to the following:
   i. The sample size should be calculated based on the number of Group Members.
   ii. The size of the sample should generally be the square root of the number of Group Members, rounded up to the upper whole number.
   iii. Twenty-five percent of the sample should be selected at random.
   iv. The size of the sample may be adapted up or down by a standard taking into account the following:
      - results of a risk assessment
      - results of internal monitoring or independent audits
      - quality/level of confidence of internal annual monitoring
      - use of technologies allowing gathering of information for specific requirements
      - based on other means of gathering information about activities on the ground

Guidance

Sample categories for internal annual monitoring should be established based on the results of a risk assessment if amending the standard sample size. The risk assessment indicator should reflect the AFF Standards. The following is a non-exhaustive list of indicators that may be used in the risk assessment.

- Ownership type
- Size class
- 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 enforcements

For each risk indicator used, the Group Organization shall constitute risk on low, medium, high level and the respective consequences of the adjustments up or down to annual internal monitoring.

3.2 Annual Reporting to the American Tree Farm System®
   a. The Group Organization must adhere to the annual reporting requirements as defined by ATFS and maintain copies of past annual reports.

Section 4. Independent Audit

4.1 Managing the Group Certification Process
   a. The Group Organization must 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 or the Standards Council of Canada.
   b. The Group Organization must 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 and ATFS Group Certification Standard.
   c. If the certification audit results in a nonconformity, the Group Organization must work with all appropriate parties to take corrective action and ensure timely implementation.
   d. The Group Organization must submit a copy of the ATFS Certificate and a summary of the audit report that is appropriate for public distribution to ATFS.
   e. The Group Organization must keep the Group Organization’s program up-to-date and in ongoing conformance with the AFF Standards.