SNOIE and ISO certification: An innovative approach ensures the reliability of information

In a sector where reliable data are both crucial and difficult to obtain, FODER has taken the extraordinary step of obtaining ISO certification for its independent system to collect and manage forest information.

In 2018 in Cameroon, a civil society organization (CSO) initiated a radical shift in independent forest monitoring (IM) activities. In a complex, non-transparent sector, _Forêts et Développement Rural_ (FODER) succeeded in standardising its approach for the collection and management of information, and certifying it under the ISO 9001:2015 quality management system – the very first time that a CSO had initiated such a process. In so doing, FODER is restoring the credibility of reports of forest illegality drawn up by independent ("external") monitors of forestry activities.

The challenge:

"It all started with an observation," explains Rodrigue Ngonzo, Chairman of the Board of Directors at FODER. "Several Cameroonian CSOs were carrying out IM activities under the FLEGT VPA[1], but their reports were poorly regarded – by the government, the Ministry of Forestry and Wildlife, the entire private sector. They didn't grasp the objectives of this monitoring, and doubted the neutrality of the organisations responsible for the activity."

Richard Nyirenda, CV4C governance expert says, "The main criticisms from the private sector were about not understanding civil society procedures. For government-mandated IM, they had an overview of procedures, but everything about external IM seemed obscure to them." The same was true on the government side.

The FODER team were honest enough to admit that, sometimes, the critics had a point. "In the 2010s, the methodologies of CSOs engaged in data collection were extremely variable, often depending on the use they wanted to make of it. Examples of poorly executed reports were regularly pulled out of the closet and attributed to all CSO actors," Ngonzo continues. "In a separate context, confrontations between communities that had blocked the logging machinery were also attributed to IM – all this was jumbled under the 'external IM' label."

In the cacophony, the authorities had an excuse to set aside any denunciations of illegalities thus reported.

IM led by CSOs was costly in terms of resources and human effort, and major difficulties had to be overcome regarding access – to information, to concession sites – but their reports were never followed up. The activity thus missed its target: Protection of forests, rights of Indigenous Peoples, biodiversity, the climate – none of this progressed an inch, and companies in breach of their obligations remained in comfortable impunity.

At about that time, in England, the Centre for International Training and Development (CIDT, which would later develop the CV4C project) organised a course on timber legality and traceability. Several FODER representatives attended. To encourage professionalism in the wood sector, a training session on ISO quality management systems was offered – and, for FODER, something clicked.

The seed of a solution was planted.

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1. Forest Law Enforcement Governance and Trade Voluntary Partnership Agreement

Imagining an uncharted approach:

One evening, in a pub – the crucible of lateral thinking – a few participants in the CIDT training, including Ngonzo, Nyirenda and ISO programme presenter Gavin Jordan, debated the idea of having the CSO-led IM process certified by the International Standardization Organization (ISO), the world's most highly respected standards body – something never before seen. Who hasn't resolved the world's problems over a few drinks with friends? With this difference: In the harsh light of the next day, *their* idea still seemed inventive and promising.

FODER started with funding from FAO[2], later relayed by the CIDT's Citizen Voices for Change (CV4C) project[3]. Nyirenda says, "I don't think people realise how innovative FODER's initiative is. No such application of ISO existed, and it was very brave for FODER to apply it in this context. CIDT supported them, but without their tenacity, without a lot of thought on their part, it would have gone nowhere."

Jordan, Director of the accredited certification body Interface NRM with 35 years of experience and a fan of the extraordinary initiative, reports that the certification process went remarkably smoothly.

As seen from the outside. By contrast for FODER, the process represented two years of hard work: a first year during which they laid the foundations and outlined the elements that needed to be tackled; a second year of repeated management reviews, internal and external audits of the initiative; all wrapped up in consultations involving the private sector, government authorities and CSOs, to validate the procedures together and counter any criticism.

It's not going too far to say that it was brave. "Within the Ministry of Forests and Wildlife (MINFOF) there were doubters, for whom an approach based on ISO 9001 was unthinkable: It was a tool reserved for large companies. The private sector was also initially unconvinced," says Justin Kamga, FODER Coordinator. More unusually, their fellow CSOs feared that, by involving the private sector, FODER would become complacent – that the new approach would inhibit them from criticising or denouncing commercial actors.

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It is true however, that from the first steps of pre-certification to ISO certification, via a mock audit in August 2017, FODER's determination did not wane. They associated with objective allies (CIFOR, two national lawyers, FAO, CIDT). They dispelled doubts by inviting extensive stakeholder participation. And a mischievous fate meant that, during that time, the ISO shifted from the QMS 9001:2008 to 9001:2015, so even before launching their external IM system, FODER had to update all its tools to fit the new requirements.

ISO certification for its Standardised External Independent Monitoring System (*Système normalisé d'observation indépendante externe*, SNOIE) was granted on 17 April 2018, and renewed since without difficulty.

How does SNOIE work?

By striving to meet ISO 9001:2015 requirements, SNOIE has become responsive and impactful. IM has now been broken down into distinct processes, each step with its own clear procedures and templates for collecting and checking information. Roles are clearly defined, and separate: The organisations responsible for IM are not the same as those that lobby the government, for example. In a context of evolving illegality, ISO certification makes it possible to emphasise the safety of monitors, and the overall situation is analysed to anticipate possible risks.

In communities across Cameroon, 126 observers (including five Indigenous representatives, and 28 women) received training in the observation of forest illegality and in the use of information collection tools. They can transmit reports of suspected illegality, in real time and with GPS coordinates, through the ForestLink[4] system.

Denunciations are then checked and validated by a multidisciplinary Technical and Ethical Assessment Committee. Data neutrality is thus ascertained before a report is submitted to the Ministry of Forests and Wildlife for an official response, and published on the IM coordination site once the deadline for reaction has expired.
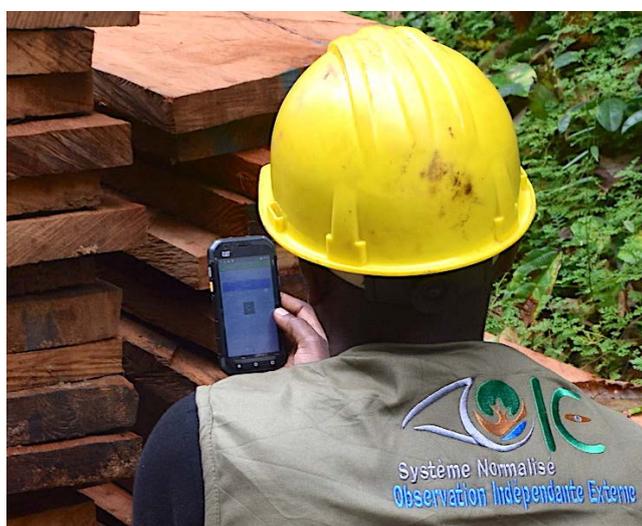
FODER oversees the coordination of the System's various links. The methods of SNOIE member organisations are standardised and replicable. And if a SNOIE actor were to fail in their duties, the customer satisfaction mechanism required by the ISO standard offers a feedback process that allows stakeholders to raise it; moreover, FODER regularly asks about their level of satisfaction.

> *Bringing SNOIE and the work of CSOs up to international quality standards [...]*
> *is also a game-changer for international regulatory initiatives.*

Hervé Joël Mounpen, FODER's Quality and Monitoring manager reflects, "Perhaps without meaning to be, we were forward-looking in addressing our critics. Before people took advantage of a single one of our reports, we ourselves had to be convinced of its correctness. We had to have all the elements to verify the data's reliability."

As a result:

Currently, organisations that are members of the SNOIE network continuously provide information in keeping with the expectations of the various stakeholders (government, timber sector, donors, CSOs) within Cameroon's regulatory framework. The burden of proof could be almost reversed: Reports of illegality cannot be dismissed without follow-up, at the risk of receiving a little reminder from such actors as Transparency International-Cameroon (TI-C), or the European Union.

An increase in accountability is underway: The government, which has limited resources to pursue illegal logging in all its guises, is thus supported. Between 2019 and 2020, authorities responded to 76 per cent of SNOIE denunciations. IM reports have led to timber seizures, temporary suspensions of logging permits, the opening of legal proceedings against companies for unauthorised logging, formal notices for illegal logging of communal forests – even sanctions against MINFOF agents that were complicit in illegal logging activities.

The State's coffers also benefit. "Our last assessment of the Register of infractions revealed that fines paid by the companies 'caught' amounted to more than 75M FCFA (114,150 EUR), not counting *transactions*[5], of which the public is unaware," says Mounpen.

Previously, the private sector saw IM only as a means of opening themselves to criticism; they complained and challenged the process. Now private actors understand that, under the ISO system, IM is objective; they know what to expect in terms of procedures and are more receptive. Those companies that are more diligent in complying with obligations may even see it as support in the face of unfair competition from unscrupulous companies.

The SNOIE 'brand' is becoming known: Already many organisations across the country are relying on SNOIE data to advance their advocacy in different areas linked to forests.

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4. "Forestlink is a real-time monitoring system that allows communities, wherever they are in the world, to collect and transmit, by tablet or smartphone, geo-referenced data about possibly illegal forest activities, providing a source of information for SNOIE. Rainforest Foundation UK and FODER developed it, and FODER has been using it in Cameroon since 2016," Christiane Zebaze, FODER, explains.
5. An available legal settlement remedy.

Where are we headed?

The FODER team takes an evolutionary view of SNOIE. They are working to adapt the system for use in the mining sector; the initiative is currently in the deployment phase, and the first reports of IM missions exposing illegal mining activities will be available shortly.

"Because it's ISO-certified, SNOIE is adaptable, and we believe that it cannot remain focused only on forests. It must also address other problems," says Laurence Wete Soh, project manager at FODER. "Our objective is really to be able to support the organisations of the Congo Basin involved in the application of laws to manage natural resources – not just concerning forests, but also mines, human rights, and issues linked to the environment, which is at the crossroads of so many legislative texts."

Beyond national borders, a great deal of interest in SNOIE exists. In the Republic of the Congo, a SNOIE system is currently being rolled out, and CSOs in Gabon are also exploring SNOIE's possibilities.

Bringing SNOIE and the work of CSOs up to international quality standards marks an important step in the battle against the complex problem of illegal logging, certainly, but it is also a game-changer for international regulatory initiatives. Rules such as the EU Timber Regulation or the Lacey Act depend on the availability of accurate data. The adoption of national laws and forthcoming EU proposals to do with due diligence in supply chains underscore the growing importance of reliable information, in the forestry sector as elsewhere. The certification of data collection methods may become even more critical in future.

Interview on 5 March 2021 with Angeline Modjo, Christelle Kouetcha, Laurence Wete Soh, Justin Kamga, Hervé Joël Mounpen, Rodrigue Ngonzo, Christiane Zebaze; 20 January with Richard Nyirenda; 17 February with Gavin Jordan. Nicole Gérard.

AT A GLANCE

1 ISO certification of the Standardized External Independent Observation System (SNOIE) on 17 April 2018, within the scope of "Monitoring of Natural Resources including Planning, Observation, Verification, Communication and Lobbying", a significant world first for civil society.

14 Member organisations in the SNOIE network (six in Cameroon, eight in the Republic of the Congo)

126 Independent Monitors (including five Indigenous, and 28 women monitors) trained in SNOIE data collection

75M FCFA (114,150 EUR) in fines paid by the companies 'caught'

1 Little brother of the external monitoring system currently being deployed in the mining sector

1 Deeper reflection engaged about how SNOIE methods could be shared in sectors beyond forests and mining

1 Vast increase in the credibility of reports of forest illegality generated, and then rigorously verified, by SNOIE monitors