

## **Complaints and Appeals**

**V1**

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### Publication history

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## Foreword

### Publishing information

This LWG process was published by Leather Working Group in 09-2025. The date of effect is 30-09-2025.

### Information about the document

This publication can be withdrawn, revised, or superseded. For information on the status of this publication, visit the LWG website at [www.leatherworkinggroup.com](http://www.leatherworkinggroup.com).

The official language of LWG standards and publications is English and the definitive version is maintained on the LWG website. Any discrepancies between copies or translations shall be resolved by reference to the definitive version.

## About LWG

Established in 2005, Leather Working Group (LWG) began as a collaborative initiative among leading footwear, apparel, and upholstery brands, alongside leather manufacturers. Founding members include adidas, Clarks, Ikea, Nike, Marks & Spencer, New Balance, Timberland, and PrimeAsia Leather Company.

Since then, LWG has grown into the world's largest stakeholder organization dedicated to the leather industry, representing over 2,000 stakeholders across 60+ countries.

Our diverse multi-stakeholder group includes:

- Brands & Retailers
- Leather Manufacturers
- Traders (raw, part-processed, and finished materials)
- Suppliers (e.g., chemical producers, machinery suppliers)
- Industry Groups, NGOs & Associations
- Finished Product Manufacturers

We are committed to delivering value to our stakeholders. Through collaboration, convening, and standard setting, we are collectively creating a transparent leather value chain that achieves positive impacts aligned to the Sustainable Development Goals.

To maintain the highest levels of quality and transparency, LWG develops its standards using a process that takes into account the principles of the ISEAL Code of Good Practice for Sustainability Systems and ISO standardization. LWG's standards development process supports its mission to promote responsible leather practices through an independent, stakeholder-focused, market-driven certification system.

LWG is committed to transparency and to trusted and respectful engagement with a wide range of stakeholders.

## LWG Vision

Leather Working Group envisages a world where leather is sourced, produced, and used sustainably, protecting people and the planet.

## LWG Mission Statement

Leather Working Group supports and encourages the use of responsibly made leather as a sustainable material by inspiring, educating, and challenging those that produce and use leather. Through collaboration, convening, and standard setting, we are collectively creating a transparent leather value chain that achieves positive impacts aligned to the Sustainable Development Goals.

# 1 Scope

This document defines how LWG responds to expressions of dissatisfaction related to:

- The implementation of LWG's policies, procedures and operating processes for which its management and Board have direct governance responsibility - referred to as a complaint.
- An LWG decision on membership, a decision on approval status of a certification body, or a certification decision made by a certification body for which the certification body's own complaints and appeals process has already been used - referred to as an appeal.
- A member of LWG not following the LWG membership rules and/or the LWG Claims Guidance.
- An LWG-certified site/company not following the LWG Claims Guidance.
- An LWG-approved certification body.
- An LWG employee, Board member, or participant of any expert bodies established by LWG to develop standards.

## 2 Terms and definitions

For the purposes of this document, the following terms and definitions apply.

**Appeal** request by an individual, organization, member of LWG, or assurance provider, for reconsideration of any adverse decision made by LWG

**Appellant** person, organization or a representative of an organization filing an Appeal requesting reconsideration of any adverse membership, approval or certification decision

**Complaint** an expression of dissatisfaction, other than Appeal, by any person or organization relating to the activities of LWG, of an LWG-approved certification body or of an LWG member

**Complainant** person, organization or a representative of an organization filing a Complaint.

**Direct Dialogue** attempt to resolve a Complaint or Appeal through discussion, prior to appointing an Investigator

**Hearsay** information received from other people which cannot be substantiated

**Investigator** individual appointed to review the Complaint or Appeal and who provides a proposed determination for review by the LWG Board for decision

**LWG Board:** board of the Leather Working Group

**Respondent** LWG, LWG Employee, LWG Member, LWG-approved certification body, or LWG-certified site against whom a Complaint or Appeal is lodged

### 3 Submission of a complaint or appeal

Disagreements between parties should normally be lodged at the lowest level first before escalating. Wherever possible, this includes raising the complaint directly with the person/organization subject to the complaint and giving the respondent an opportunity to respond and/or rectify the situation. For example, a complaint against a certification decision should first be attempted to be resolved via the certification body's own complaints mechanism.

A decision made by LWG on membership or approval should be lodged as an appeal with LWG directly.

A complaint or appeal will not be accepted if:

- it is a legal matter which should be handled through the legal system;
- it is trivial, vexatious or manifestly unfounded; or
- it is not supported by objective evidence.

To be accepted by LWG as a formal complaint, the complaint must:

- be in scope of LWG's complaints & appeals mechanism;
- include specific and objective evidence to support any claim; and
- be submitted in English.

*NOTE Other languages may be accepted on a case-by-case basis. A request to submit a complaint in a different language should be agreed with LWG in advance.*

Any complaint based upon hearsay cannot be accepted. In such a case, LWG will request further information from the complainant to assess whether the complaint can be substantiated. If no response is received within 30 calendar days, the complaint will be considered withdrawn and therefore closed.

LWG will aim to acknowledge receipt within seven (7) calendar days of submission and will aim to accept or reject the complaint within twenty one (21) calendar days of submission, based on the acceptance criteria. If the complaint is rejected, the complainant will be informed of the reason and their options for re-submitting the complaint.

To be accepted by LWG as a formal appeal, the appellant must, in addition to the criteria for a formal complaint, include details of the adverse membership, approval or certification decision and how LWG has not followed or correctly interpreted its own procedures/requirements.



## 4 Investigating a complaint or appeal

Once accepted as a complaint or appeal, LWG seeks to investigate in a fair, balanced, and impartial manner, resolving it efficiently and effectively. Attempts will be made to resolve the complaint of appeal via direct dialogue. If direct dialogue does not result in a resolution, the LWG will then appoint a member of the LWG Board to conduct the review of the complaint/appeal (the investigator).

Appeals will be investigated by individual(s) with knowledge and experience of the subject matter. All complaints/appeals must be investigated by an investigator who has not directly been involved in the decision for which a reconsideration is being sought (appeal) or resolution (complaint).

the investigator will reach out to all the parties (complainant/appellant and respondent) to conduct the review, including seeking responses from the parties. the investigator will objectively analyse and assess the complaint/appeal using all available and relevant information.

The investigator may request further information from the complainant/appellant to determine the full nature and extent of the complaint/appeal, specifying that the complainant/appellant has thirty (30) calendar days to provide this. If the complainant/appellant fails to respond within thirty (30) calendar days following a request for information or an acknowledgement at any point in the investigation, LWG reserves the right to consider the complaint/appeal withdrawn and therefore closed.

Based on the information provided, the investigator will draft a report containing:

- a summary of the nature of the Complaint/Appeal.
- a summary analysis of the main arguments made by each party.
- a proposed determination as to the validity of the Complaint/Appeal, which will be one of the following:
  - Not upheld.
  - Not upheld, but with improvement plan proposed and included in the report.
  - Upheld, with corrective action plan proposed and included in the report.

The draft report will be circulated to all parties to the complaint/appeal (complainant/appellant and respondent) for comment and to identify any errors of fact within fourteen (14) calendar days. Comments received from the parties should be included in a revised report which will go to the LWG Board for final decision.

Any membership, approval or certification decision that is the subject of an appeal will remain valid during the appeals process until and unless a change is required as a conclusion to the appeal.

## 5 Complaint or appeal decision

The LWG Board will review the draft report as provided by the investigator and will decide whether to accept the determination of the investigator, and the improvement plan if proposed. A final decision should be reached via consensus. Depending on the nature of the complaint/appeal, a decision should be provided within thirty (30) calendar days.

Within fourteen (14) calendar days of the final decision, the investigator will inform the complainant/appellant and other parties of the decision, along with any agreed improvement plan and the timeline for implementation.

The investigator will oversee any implementation of the improvement plan and report back to the complaint/appeal panel on any agreed milestones and on completion of the actions.

## 6 Confidentiality

A complainant raising a complaint with LWG need not disclose their identity if they choose to maintain their anonymity. Where an individual raising a confidential concern identifies themselves, their identity will not be further disclosed to persons assessing the complaint without the individual's consent. If complaints are raised confidentially, LWG will make every effort to withhold the identity of those raising it, and will only proceed to investigate the complaint if the person raising it agrees to the matter being so disclosed.

The right to anonymity does not apply if LWG believes there is a legal or regulatory obligation to disclose the concern.