

**PEFC INTERNATIONAL STANDARD PEFC ST 2002:200x (ED)**  
Requirements for PEFC scheme users

**Enquiry draft**  
**2009-05-26**

---

**Chain of custody of forest based products –  
requirements with guidance for use**



---

**PEFC Council**

World Trade Center 1, 10 Route de l'Aéroport  
CH-1215 Geneva, Switzerland  
Tel: +41 (0)22 799 45 40, Fax: +41 (0)22 799 45 50  
E-mail: [info@pefc.org](mailto:info@pefc.org), Web: [www.pefc.org](http://www.pefc.org)

**Copyright notice**

© PEFC Council 2009

This PEFC Council document is copyright-protected by the PEFC Council. The document is freely available from the PEFC Council website or upon request.

No part of the document covered by the copyright may be changed or amended; reproduced or copied in any form or by any means for commercial purposes without the permission of the PEFC Council.

The only official version of the document is English. Translations of the document can be provided by the PEFC Council or PEFC National Governing Bodies. In case of any doubt the English version is definitive.

**Document name:** Chain of custody of forest based products – requirements with guidance for use

**Document title:** PEFC ST 2002:200x (ED), enquiry draft

**Approved by:**

**Date:**

**Issue date:**

**Application date:**

**Transition date:** one year from the issue date

## Content

Foreword.....	5
Introduction.....	6
1 Scope.....	7
2 Normative references.....	7
3 Terms and Definitions.....	8
4 Requirements for chain of custody process – physical separation.....	12
4.1 General requirements for physical separation.....	12
4.2 Identification of the origin.....	12
4.2.1 Identification at delivery (incoming) level.....	12
4.2.2 Identification at supplier level.....	12
4.3 Separation of the certified material/products.....	13
4.4 Sale and communication on certified products.....	13
4.4.1 Documentation associated with sold / transferred products.....	13
4.4.2 Usage of logos and labels.....	14
5 Requirements for chain of custody process – percentage based method.....	15
5.1 General requirements for percentage based methods.....	15
5.1.1 Application of percentage based method.....	15
5.1.2 Definition of the product group.....	15
5.2 Identification of the origin.....	15
5.2.1 Identification at delivery level.....	15
5.2.2 Identification at supplier level.....	16
5.3 Calculation of the certified percentage.....	16
5.4 Transfer of the calculated percentage to the outputs.....	17
5.4.1 Average percentage method.....	17
5.4.2 Volume credit method.....	17
5.5 Sale and communication on certified products.....	18
5.5.1 Documentation associated with sold / transferred products.....	18
5.5.2 Usage of logos and labels.....	19
5.6 Controversial sources.....	19
6 Minimum management system requirements.....	20
6.1 General requirements.....	20
6.2 Responsibilities and authorities.....	20
6.2.1 General responsibilities.....	20
6.2.2 Responsibilities and authorities for chain of custody.....	20
6.3 Documented procedures.....	20
6.4 Record keeping.....	21
6.5 Resource management.....	21

6.5.1	Human resources / personnel.....	21
6.5.2	Technical facilities .....	21
6.6	Inspection and control.....	21
6.7	Complaints.....	22
6.8	Subcontracting.....	22

## **Foreword**

The PEFC Council (the Programme for the Endorsement of Forest Certification schemes) is the worldwide organisation promoting sustainable forest management through forest certification and labelling of forest based products. Products with PEFC claim and / or label deliver confidence that raw material originates in sustainably managed forests.

The PEFC Council provides endorsement of national forest certification schemes which are required to comply with the PEFC Council requirements subject to regular evaluations.

The document had been developed in an open, transparent, consultative and consensus based process covering a broad range of stakeholders.

This document replaces Annex 4 of the PEFC Council Technical Document (Chain of custody of forest based products - requirements) which is hereby withdrawn after an one year transition period starting from the publication of the document.

## **Introduction**

The PEFC claims made on forest based products provide information relating to the origin of forest based product in sustainably managed forest and recycled sources and other non controversial sources. Purchasers and potential purchasers can use this information in choosing the product based on sustainability, as well as other considerations. The aim of communicating on the raw material's origin is to encourage demand for and supply of those products originating in sustainably managed forests and thereby stimulating the potential for market-driven continuous improvement of the world's forest resource.

The overall goal of the PEFC chain of custody is to provide customers of forest based products with accurate and verifiable information on the content of material originating in PEFC certified, sustainable managed forest and of recycled material.

## 1 Scope

Chain of custody requirements describe the process of how to get from the information about the origin associated with the procured raw material to the information about the origin which is attached to the organisation's products. This standard specifies two optional approaches for chain of custody, namely the physical separation and percentage-based methods.

This standard also specifies the minimum management system requirements for the implementation and management of the chain of custody process. An organisation's quality (ISO 9001:2008) or environmental management system (ISO 14001:2004) may be used to meet the minimum requirements for the management system defined in this standard.

This standard covers requirements for chain of custody of forest based products which includes raw material originating in forest and other areas which are subject to PEFC endorsed forest management certification, including recycled material originally coming from those areas.

The chain of custody shall be used in connection with the definition of specific PEFC claims or claims of PEFC endorsed forest certification schemes, which include criteria for the recognition of certified material. The usage of claims and relating labels, as a result of implementation of the chain of custody, is based on ISO 14020:2000 that shall be followed by the users of this chain of custody standard. Consideration of recycled material within the chain of custody is based on the requirements of ISO/IEC 14021:1999 that shall be followed by the users of this chain of custody standard.

The labelling of products is considered as an optional communication tool which may be incorporated into the organisations chain of custody process(es). Where the organisation decides to apply the on-product labelling, the requirements for the usage of a label, including those set up by the owner of the label are becoming an integral part of chain of custody requirements.

This document shall be implemented for the purposes of third party conformity assessment based on requirements defined by the PEFC Council or PEFC endorsed forest certification schemes. The conformity assessment is considered as product certification and shall follow ISO/IEC Guide 65 / 1996.

The term "shall" is used throughout this standard to indicate those provisions that are mandatory. The term "should" is used to indicate those provisions which, although not mandatory, are expected to be adopted and implemented. The term "may" used throughout the document indicates permission expressed by the document whereas "can" refers to the ability of a user of the document or to a possibility open to him/her.

## 2 Normative references

The following referenced documents are indispensable for the application of this document. For both dated and undated references, the latest edition of the referenced document (including any amendment) applies.

PEFC ST 2001:2008, *PEFC Logo usage rules - Requirements*

ISO/IEC Guide 2:2004, *Standardization and related activities -- General vocabulary*

ISO 9000:2005, *Quality management systems -- Fundamentals and vocabulary*

ISO 9001:2008, *Quality management systems -- Requirements*

ISO 14001:2004, *Environmental management systems -- Requirements with guidance for use*

ISO/IEC 14020:2000, *Environmental labels and declarations -- General principles*

ISO/IEC 14021:1999, *Environmental labels and declarations -- Self-declared environmental claims (Type II environmental labelling)*

ISO/IEC Guide 65:1996, *General requirements for bodies operating product certification systems*

### 3 Terms and Definitions

For the purposes of this standard, the relevant definitions given in ISO/IEC Guide 2 and ISO 9000:2005 apply, together with the following definitions:

#### 3.1

##### **Accredited certificate**

A certificate issued by a certification body within the scope of its accreditation which bears the accreditation body's symbol.

#### 3.2

##### **Certified material**

Raw material whose **origin** is covered by the chain of custody claims.

Note: The criteria for certified material and its suppliers are defined as a part of the definition of PEFC claims which can be found in an Appendix to this standard on specification of claims. In addition, forest certification schemes endorsed by PEFC can make their own definition of certified material within their own claims used together with this standard.

#### 3.3

##### **Certified product**

Product which includes **certified material** whose content is verified by chain of custody.

##### *Discussion topic*

*The term certified material / product is a generic term which defines material covered by the chain of custody claim. It can be material from certified forest but also recycled material based on the definition of the specific claim.*

*The term "certified" material is now commonly used. However it can mislead users of the standard that it always means material from certified forest. For example for "PEFC recycled" claim would however material from PEFC certified forest be considered as "other" rather than "certified".*

*Alternative proposals are to use the term "recognised material" (material which is recognised for a specific claim) or "C-o-C material/product" as they are more generic than "certified".*

#### 3.4

##### **Chain of custody of forest based products**

Process of handling of information on **the origin of forest based products** which allows the organisation to make accurate and verifiable claims on the content of certified material.

#### 3.5

##### **Controversial sources**

Forest management activities which are not complying with local, national or international legislation, in particular relating to the following areas:

- (a) forestry operations and harvesting, including conversion of forest to other use,
- (b) management of areas with high environmental and cultural values designed and covered by the legislation,
- (c) protected and endangered species, including requirements of CITES,
- (d) health and labour issues relating to forest workers,
- (e) property, tenure and use right of indigenous peoples,
- (f) payment of taxes and royalties;

and areas utilising genetically modified organisms.

#### 3.6

## **Claim**

Information which indicates certain aspects of a product.

Note: The term “claim” used in this standard indicates usage of the official chain of custody claims (see Appendix 1) relating to the origin of raw material.

### **3.7**

## **Customer**

A single entity, either buyer or user of the organisation’s products to whom the claim is made.

Note: The term customer also covers an internal customer within the organisation where more subsequent product groups exist.

### **3.7**

## **Forest based material**

Raw material originating in forest areas or from other areas recognised by the PEFC Council as eligible for PEFC forest management certification, including **recycled material** originally coming from those areas.

Note: The forest based material includes wood based as well as non-wood based material.

### **3.8**

## **Forest based products**

Products including **forest based material**.

### **3.9**

## **Labelling**

Usage of **labels** (on- or off-product).

### **3.10**

## **Neutral material**

Raw material whose **origin** is considered as neutral in the calculation of the claim percentage.

Note: The criteria for certified material and its suppliers are defined as a part of the definition of PEFC claims which can be found in an Appendix to this standard on specification of claims. In addition, forest certification schemes endorsed by PEFC can make their own definition of certified material within their own claims used together with this standard.

### **3.10**

## **Organisation**

Any entity which is making the claims on products and is implementing requirements of this standard. Such an entity shall demonstrate ability to clearly identify the supplier of raw material and the customer of its products. This also includes internal claims made within the organisation and identification of internal suppliers and customers.

### **3.11**

## **Origin / material origin**

Information associated with the raw material used in the product referring to the characteristics of the place that the raw material comes from.

Note: The origin (i.e. “characteristics of the place where the raw material is coming from”) means for example the origin in PEFC certified, sustainable managed forest or the origin in recycled sources. The standard uses three categories of the origin, **certified**, **neutral** and **other** material, whose definitions are made specifically for individual claims.

### **3.12**

## **Other material**

Raw material other than **certified** and **neutral** material.

### 3.13

#### PEFC recognised certificate

is:

- a) a valid **accredited** forest management certificate issued by PEFC notified certification body against the forest management scheme/standard which is endorsed by the PEFC Council,
- b) a valid **accredited** chain of custody certificate issued by PEFC notified certification body against PEFC international chain of custody standard together with PEFC recognised specification of the origin or
- c) a valid **accredited** chain of custody certificate issued by PEFC notified certification body against a scheme specific chain of custody standard which is endorsed by the PEFC Council.

Note: PEFC endorsed forest certification schemes and chain of custody standards are found at the PEFC Council website, [www.pefc.org](http://www.pefc.org).

### 3.14

#### Physical separation

A procedure in which various material/products of different **origin** are kept separate so that the origin of the material/products used transferred to the **customer** is known.

Note: Physical separation can involve physical separation at an organisation's facility e.g. in separate bays or in specific storage areas of the facility, or it can include clear marking or usage or having distinguishing marks, to readily identify the materials of different origin categories.

### 3.15

#### Pre-consumer material

**Forest based material** diverted from the waste stream during a manufacturing process. Excluded is reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it (ISO 14 021)

The definition of pre-consumer material excludes sawmilling by-products such as sawdust, chips, bark, etc.

Note: "capable of being reclaimed within the same process that generated it" means that the material generated in one process is continuously returned to the same process. An example is residue generated by a press line in a panel board production which continuously re-enters the same pressline. This is not considered as pre-consumer recycled material.

### 3.16

#### Post-consumer material

**Forest based material** generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain (ISO 14 021).

Note: The commercial, industrial and institutional facilities role as end-users excludes material which is a result of the organisation's processing or manufacturing activities, such as off-cuts.

Example 1: Printer's off-cuts are not post-consumer material as the printer is not the end-user of the product but is involved in the product manufacturing.

Example 2: Newspaper, magazines and books, which were displayed at the store (distribution chain) but have been returned because they were not sold to the users, are considered as post-consumer material.

### 3.17

#### Product group

Set of products manufactured or traded in the specified processes and within the specified time period which are covered by the organisation's chain of custody.

Note 1: The organisation can establish one or more product groups as parallel or subsequent processes.

Note 2: The chain of custody product group can also include a single product for which the chain of custody is implemented. This approach of implementing chain of custody is also called "project chain of custody".

### **3.18**

#### **Recycled material**

#### **Pre consumer material and post consumer material**

### **3.19**

#### **Rolling percentage calculation**

Calculation of the certification percentage based on input material procured during the specified period before the product's manufacturing or trading.

### **3.20**

#### **Simple percentage calculation**

Calculation of the certification percentage based on input material physically included in the product for which the calculation is made.

### **3.21**

#### **Supplier**

A clearly identified single entity directly supplying input material to the relevant product group together with a claim on the material origin.

Note 1: In cases where the material is physically delivered by another entity than that having the ownership title to the material, the organisation shall appoint a single supplier for the purposes of this definition, either an entity with the ownership title or an entity physically delivering the material. E.g. A printing house procuring material from a distributor, which is however delivered directly by a paper producer, may consider as the supplier either the distributor or paper producer.

Note 2: The term supplier also covers an internal supplier within the organisation where more subsequent product groups exist.

## **4 Requirements for chain of custody process – physical separation**

### **4.1 General requirements for physical separation**

4.1.1 The organisation, whose certified material / products are not mixed with other material/products and/or where the certified material/products can be identified during the whole process, should use the physical separation as the preferred option.

4.1.2 The organisation applying the physical separation method shall ensure that the certified material is separated or clearly identifiable at all stages of the production or trading process.

4.1.3 The physical separation method may also apply to the certified products with various content of certified material.

Note: The organisation may physically separate a product(s) with the same percentage based claim from other products with or without different percentage claims.

### **4.2 Identification of the origin**

#### **4.2.1 Identification at delivery (incoming) level**

4.2.1.1 The organisation shall obtain from the suppliers for each delivery of certified material/products information necessary to identify and verify the category of the origin of all procured material.

4.2.1.2 A document associated with each delivery shall include at least the following information:

- (a) the organisation's name as the recipient of the delivery,
- (b) supplier identification,
- (c) product(s) identification,
- (d) quantity of delivery for each product covered by the documentation,
- (e) date of delivery / delivery period / accounting period,
- (f) the formal claim on the material origin (including percentage of certified material) specifically for each certified product covered by the documentation,
- (g) the identifier of the supplier's chain of custody or forest management certificate or other document confirming the supplier's certified status.

Note 1: The formal claim on the material origin as well as documents confirming the certified status are specified in an Appendix to this standard or by other document(s) defined by the relevant forest certification or labelling scheme.

Note 2: The term "the formal claim" means the claim in its exact wording as specified in an Appendix to this standard or by other document defined by the relevant forest certification or labelling scheme.

Note 3: The certificate identifier can be a numerical or alpha-numerical combination and is usually referred to as the "certification number".

4.2.1.3 For each delivery the organisation shall classify the procured material as certified, neutral or other material following the claim specification for which the chain of custody was implemented.

Note 1: The definition of certified, neutral and other material is defined for a specific claim in an Appendix to this standard or by other document(s) defined by the relevant forest certification or labelling system.

#### **4.2.2 Identification at supplier level**

4.2.2.1 The organisation shall require, from all suppliers of the certified material, a copy of a forest management or chain of custody certificate or other document confirming the supplier's

certified status, which proves that the criteria set for the supplier of the certified material have been met.

Note: The criteria for the supplier of certified material are specified for each claim in an Appendix to this standard or by other document(s) defined by the relevant forest certification or labelling scheme.

4.2.2.2 The organisation shall evaluate the supplier's compliance with the criteria for the suppliers of certified material.

Note: In addition to the receipt of a document identified under chapter 4.2.2.1 from the supplier, the organisation should make use of publicly available registers of suppliers of certified material kept by the PEFC Council or other recognised organisations.

### **4.3 Separation of the certified material/products**

4.3.1 Certified material and certified products with different content of certified material shall remain clearly identifiable throughout the whole production / trading and storage process. This shall be achieved by:

- (a) physical separation in terms of production and storage space or
- (b) physical separation in terms of time or
- (c) clear identification of the certified material / products during the process.

### **4.4 Sale and communication on certified products**

#### **4.4.1 Documentation associated with sold / transferred products**

4.4.1.1 At the point of sale or transfer of the certified products to the customer, the organisation shall provide any new customer with a copy of its chain of custody certificate. The organisation shall inform the customers about any change in the scope of its certification and shall not misuse its certification.

Note: In case multi-site certification where individual sites receive a separate document (referring to the main certificate) confirming their certified status, the organisation (the site) provides its customers copies of this document together with the main certificate.

4.4.1.2 For the purposes of communication of the chain of custody claim, the organisation shall identify a single type of document associated with the delivery of all sold / transferred products. The document, including the formal claim shall be issued to a single customer. The organisation shall keep copies of the documents and ensure that information in those copies cannot be altered after the original is delivered to the customer.

Note: The document associated to each delivery covers the media and information, including electronic media.

4.4.1.3 The document associated with each delivery of all products shall include at least the following information:

- (a) customer identification,
- (b) supplier identification,
- (c) product(s) identification,
- (d) quantity of delivery for each product covered by the documentation,
- (e) date of delivery / delivery period / accounting period,

4.4.1.4 The document associated with each delivery of all certified products shall include at least the following information:

- (a) the formal claim on the material origin (including percentage of certified material) specifically for each certified product covered by the document,
- (b) the number of the supplier's chain of custody certificate or other document confirming the supplier's certified status.

Note 1: The claim on the material origin is specified in an Appendix on specification of the claim or by other document(s) defined by the relevant forest certification or labelling scheme.

Note 2: “The formal claim” means the claim in its exact wording as specified in the Appendix on specification of the claim or by other document(s) defined by the relevant forest certification or labelling scheme.

#### **4.4.2 Usage of logos and labels**

4.4.2.1 The organisation which uses a logo or label, for on-product and/or off-product purposes, relating to the chain of custody certification, shall have an authorisation from the logo/label’s trademark owner and the usage shall be carried out according to the terms and conditions of the authorisation.

Note 1: Where the organisation decides to use the logo/label, the logo/label usage rules specified by the logo/label owner become an integral part of the chain of custody requirements.

Note 2: The PEFC Logo shall be used in accordance with PEFC ST 2001:2008 based on a valid licence issued by the PEFC Council or other body authorised by the PEFC Council.

4.4.2.2 The organisation may only use the label on-product for those certified products that meet the eligibility criteria for product labelling as specified by the owner of the logo/label trademark.

4.4.2.3 The organisation which makes on-product claims relating to chain of custody certification shall always use the “formal claim” and the organisation making the claim shall be identifiable.

## **5 Requirements for chain of custody process – percentage based method**

### **5.1 General requirements for percentage based methods**

#### **5.1.1 Application of percentage based method**

5.1.1.1 The percentage based method of the chain of custody applies to the organisations that are mixing certified material/products with other material categories.

#### **5.1.2 Definition of the product group**

5.1.2.1 The organisation shall implement the requirements for the chain of custody process of this standard for the specific product group.

5.1.2.2 The product group shall be associated with (i) a single product type or (ii) a group of products, which consist of the same or similar input material according to, for example species, sort, etc. The material entering the group of products shall have the same measurement unit or units that are transferable to the same measurement unit.

5.1.2.4 The product group shall be associated with products which have been produced or manufactured by the organisation at one production site.

Note: This requirement is not applicable to organisations and its processes where the production site cannot be clearly identified, e.g. forest contractors, transportation, trade, etc.

### **5.2 Identification of the origin**

#### **5.2.1 Identification at delivery level**

5.2.1.1 The organisation shall obtain from the suppliers for each delivery of any material entering the chain of custody product group information necessary to identify and verify the category of the origin of the procured material.

5.2.1.2 The document associated with each delivery of material shall include at least the following information:

- (a) the organisation's identification as the recipient of the delivery,
- (b) supplier's identification,
- (c) product(s) identification,
- (d) quantity of delivery for each product covered by the documentation,
- (e) date of delivery / delivery period / accounting period,

5.2.1.3 In addition to information required by chapter 5.2.1.2 a document associated with each delivery of certified material/products shall include the following information:

- (a) the formal claim on the material origin (including percentage of certified material) specifically for each certified product covered by the documentation,
- (b) number of the supplier's chain of custody or forest management certificate or other document confirming the supplier's certified status.

Note 1: The claim on the material origin is specified in an Appendix on specification of the claim standard or by other document(s) defined by the relevant forest certification or labelling scheme.

Note 2: "the formal claim" means the claim in its exact wording as specified in an Appendix on specification of the claim or by other document(s) defined by the relevant forest certification or labelling scheme.

5.2.1.4 For each delivery the organisation shall classify the procured material as certified, neutral or other material following the claim specification for which the chain of custody was implemented.

Note: Criteria for certified, neutral and other material for a specific claim are specified in an Appendix on specification of the claim or by other document(s) defined by the relevant forest certification or labelling scheme.

## 5.2.2 Identification at supplier level

5.2.2.1 The organisation shall require from all suppliers of the certified material a copy of a forest management or chain of custody certificate or other document confirming the supplier's certified status, which proves that the criteria set for the supplier of the certified material have been met.

Note: The criteria for the supplier of certified material and documents confirming the supplier's certified status are specified for each claim in an Appendix on specification of the claim or by other document defined by the relevant forest certification or labelling scheme.

5.2.2.2 The organisation shall evaluate the supplier's compliance with the criteria for the supplier's of certified material.

Note: In addition to the document received from the supplier, the organisation should make use of publicly available registers of suppliers of certified material kept by the PEFC Council or other recognized organisations.

## 5.3 Calculation of the certified percentage

5.3.1 The organisation shall calculate the certification percentage separately for each product group and for a specific claim period according to the following formula:

$$P_c [\%] = \frac{V_c}{V_c + V_o} \cdot 100$$

**P<sub>c</sub>** Claim percentage

**V<sub>c</sub>** Volume of certified material

**V<sub>o</sub>** Volume of other material

Note: In addition to certified and other material, the criteria for specific claims also define neutral material which does not enter into the calculation formula. Therefore, the total volume of the material is the sum of certified material, neutral material and other material. ( $V_t = V_c + V_o + V_n$ ; where  $V_t$  is total volume of material and  $V_n$  is volume of neutral material).

5.3.2 The organisation shall calculate the certification percentage based on a single measurement unit used for all raw material covered by the calculation. In cases of conversion to a single measurement unit for calculation purposes, the organisation shall only use generally recognised conversion ratios and methods. If a suitable generally recognised conversion ratio does not exist, the organisation shall define and use a reasonable and credible conversion ratio.

5.3.3 If the procured product includes only a proportion of certified material, then only the quantity corresponding to the percentage claimed by the supplier shall enter the calculation formula as certified material. The rest of material shall enter the calculation as other material.

5.3.4 The organisation shall calculate the certification percentage either as:

- (a) simple percentage or
- (b) rolling percentage.

5.3.5 The organisation applying the simple percentage calculation shall make the calculation of the certified percentage based on material physically included in the specific product group for which the percentage is calculated.

5.3.6 The organisation applying rolling percentage shall calculate the certification percentage for the specific product group and claim period based on material procured in the specified material input period preceding the claim period. The claim period, in the case of

rolling percentage, shall not exceed 3 months and the material input period shall not exceed 12 months.

Note: The organisation which has chosen 3 months claim period and 12 months material input period will calculate the rolling percentage for the coming three months from the quantity of material procured in the previous 12 months.

## 5.4 Transfer of the calculated percentage to the outputs

### 5.4.1 Average percentage method

5.4.1.1 The organisation applying average percentage method shall use the calculated certification percentage for all the products covered by the product group for which the calculation has been made.

Note 1: No minimum threshold for the certified percentage is set to use the average percentage method. However, the certified percentage is always a part of the claim delivered to the customer. An individual forest certification or labelling scheme may however determinate a minimum threshold for the usage of its label.

Note 2: If the certified percentage calculated for the 3 months claim period is e.g. 54 %, all products covered by the product group can be sold/transferred as certified products including 54 % percent of certified material during this claim period, e.g. "54 % PEFC Certified".

### 5.4.2 Volume credit method

5.4.2.1 The organisation shall apply the volume credit method for a single claim. The organisation receiving material with more than one claim relating to the origin of raw material shall use only one claim for calculating the volume credits.

Note: The organisation which is receiving material with two claims relating to two certification schemes (e.g. PEFC and FSC) shall decide, for a single delivery, which claim (either PEFC or FSC) will be entered into the volume credit account.

#### *Discussion topic:*

*This provision should avoid situation that a company procuring material which is both FSC and PEFC certified would create two credit accounts, one for PEFC and one for FSC and would have double volume credits which can be distributed to the product group, e.g. a company would buy 50 tonnes as PEFC and FSC certified and would receive 50 tonnes credits for PEFC and 50 tonnes credits for FSC. This scenario can happen for any "double" claims, e.g. PEFC / SFI, PEFC/AFS, etc.*

*The alternative solution would be to require that:*

#### *Option 2:*

*The organisation shall not use the volume credit method where more than one claim is made for the output products of one product group relating to the origin of raw material.*

*Note: The organisation which is applying for example claims relating to two certification schemes (e.g. PEFC and FSC) shall use the volume credit method but shall use the average percentage method.*

#### *Option 3:*

*The organisation shall apply the volume credit method for a single claim. The organisation receiving material with more than one claim relating to the origin of raw material shall either use it as a single inseparable claim or shall only use one from the received claims for calculating the volume credits.*

*Note: The organisation which is receiving material with two claims relating to two certification schemes (e.g. PEFC/FSC certified) shall either establish a credit account for the multiple claims (PEFC/FSC certified) or decide, for a single delivery, which claim (either PEFC or FSC) will be entered into the respective volume credit account.*

5.4.2.2 The organisation shall calculate the volume credits using either:

- (a) Certification percentage and volume of output products (ch. 5.4.2.3) or

(b) Input material and input/output ratio (ch. 5.4.2.4).

5.4.2.3 The organisation applying the certification percentage shall calculate the volume credits by multiplying the volume of output products of the claim period by the certified percentage for the relevant claim period.

Note: If the certified percentage for the product group of the specific claim period, which consists of 100 tonnes of output products, is 54 %, the organisation achieves volume credits equal to 54 tonnes of the output products.

5.4.2.4 The organisation that can demonstrate a verifiable ratio between the input material and output products, may calculate the volume credits directly from input certified material by multiplying the volume of input certified material by the input/output ratio.

Note: If the volume of input certified material is 100 tonnes and input/output ratio is 0.60 (e.g. 1 m<sup>3</sup> of roundwood results in 0.60 m<sup>3</sup> of sawnwood), the organisation achieves volume credits equal to 60 m<sup>3</sup> of sawnwood.

5.4.2.5 The organisation shall create and manage a credit account in a single measurement unit and shall enter the volume credits into the credit account. The credit account shall be established for individual product types of the product group or for the whole product group where the same measurement is applied to all product types.

5.4.2.7 The total quantity of credits cumulated at the credit account shall not exceed the sum of credits entered into the credit account during the last twelve months.

5.4.2.8 The organisation shall distribute the volume credits from the credit account for the output products covered by the credit account. The volume credits shall be distributed to the output products in a way that the certified products will be considered as containing 100 % of certified material or as containing less than 100 % certified material and meeting the organisation's own threshold. The result of the volume of certified products multiplied by the output percentage of certified material included in the certified products shall be equal to the distributed volume credits withdrawn from the credit account.

Note: If the organisation decides to distribute 54 tonnes of volume credits to output products, then the organisation can either sell 54 tonnes as certified products including 100 % of certified material (e.g. 54 tonnes as "100 % PEFC Certified") or x tonnes as certified products including y % of certified material, where  $x * y =$  distributed volume credit (e.g. 77 tonnes of output products can be sold as "70 % PEFC Certified", where  $77 \text{ t} * 0,70 = 54 \text{ t}$ ).

## **5.5 Sale and communication on certified products**

### **5.5.1 Documentation associated with sold / transferred products**

5.5.1.1 At the point of sale or transfer of the certified products to the customer, the organisation shall provide any new customer with a copy of its chain of custody certificate or other document confirming the organisation's compliance with the criteria for the supplier of certified material. The organisation shall inform the customer about any change in the scope of its certification and shall not misuse its certification.

Note: In case of multi-site certification where individual sites receive a separate document (referring to the main certificate) confirming their certified status, the organisation (the site) provides its customers copies of both this document and the main certificate.

5.5.1.2 For the purposes of communication of a chain of custody claim, the organisation shall identify a single type of document associating delivery of all sold / transferred products. This document and the chain of custody claim for a specific claim shall be issued to a single customer. The organisation shall ensure that the document and/or its information cannot be altered after it is delivered to the customer.

Note: The document associated to each delivery covers the media and information, including electronic media.

5.5.1.3 The document associated with each delivery of all products covered by the chain of custody shall include at least the following information:

(a) customer identification,

- (b) supplier identification,
- (c) product(s) identification,
- (d) quantity of delivery for each product covered by the documentation,
- (e) date of delivery / delivery period / accounting period,

4.5.1.4 In addition to information required in 5.5.1.3 the document associated with each delivery of certified products shall include the following information:

- (a) the formal claim on the material origin (including percentage of certified material) specifically for each certified product covered by the document,
- (b) the number of the supplier's chain of custody certificate or other document confirming the supplier's certified status.

Note 1: The claim on the material origin is specified in an Appendix on specification of the claim or by other document(s) defined by the relevant forest certification or labelling scheme.

Note 2: "The formal claim" means the claim in its exact wording as specified in Appendix on specification of the claim or by other document(s) defined by the relevant forest certification or labelling scheme.

## **5.5.2 Usage of logos and labels**

5.5.2.1 The organisation which uses a logo or label, for on-product and/or off-product purposes, relating to the chain of custody certification, shall have an authorisation from the logo/label's trademark owner and the usage shall be carried out according to the terms and conditions of the authorisation.

Note 1: Where the organisation decides to use the logo/label, the logo/label usage rules specified by the logo/label owner are becoming an integral part of the chain of custody requirements.

Note 2: The PEFC Logo can only be used based on valid licence issued by the PEFC Council or other body authorised by the PEFC Council following the PEFC ST 2001:2008 (PEFC Logo usage rules).

5.5.2.2 The organisation can only use the label on-product for those certified products which are meeting eligibility criteria product labelling specified by the owner of the label trademark.

## **5.6 Controversial sources**

5.6.1 The organisation shall establish a due diligence system minimising the risk that the certified products do not include raw material from controversial sources complying with Appendix 3 to this standard.

## **6 Minimum management system requirements**

### **6.1 General requirements**

The organisation shall operate a management system in accordance with the following elements of this standard, which ensure correct implementation, and maintenance of the chain of custody process(es). The management system shall be appropriate to the type, range and volume of work performed.

Note: An organisation's quality (ISO 9001:2008) or environmental (ISO 14001:2004) management system can be used to meet the minimum requirements for the management system defined in this standard.

### **6.2 Responsibilities and authorities**

#### **6.2.1 General responsibilities**

6.2.1.1 The organisation shall define and document its commitment to implement and maintain the chain of custody requirements in accordance with this standard. The organisation's commitment shall be made available to the organisation's personnel, suppliers, customers, and other interested parties.

6.2.1.2 The organisation shall appoint a member of the management who, irrespective of other responsibilities, shall have overall responsibility and authority for the organisation's chain of custody.

6.2.1.3 The organisation shall carry out a regular periodic review of the organisation's chain of custody and its compliance with the requirements of this standard.

#### **6.2.2 Responsibilities and authorities for chain of custody**

The organisation shall identify the personnel performing activities for the implementation and maintenance of chain of custody and shall establish personnel responsibilities and authorities relating to chain of custody for at least the following elements:

- (a) raw material procurement and identification of the origin,
- (b) product processing covering physical separation or percentage calculation and transfer into output products,
- (c) product sale and labelling,
- (d) record keeping,
- (e) internal audits and non-conformity control,
- (f) due diligence system relating to controversial sources.

Note: The responsibilities and authorities for the chain of custody given above can be cumulative.

### **6.3 Documented procedures**

6.3.1 The organisation shall establish written documented procedures for its chain of custody. The documented procedures shall include at least the following elements:

- (a) organisational structure, responsibilities and authorities relating to chain of custody,
- (b) description of the raw material flow within the production/trading process, including definition of product groups,
- (c) procedures for chain of custody process covering all requirements of this standard, including:
  - identification of the raw material origin,

- physical separation of certified material (for the organisations applying the physical separation),
  - definition of product groups, calculation of the certified percentage, calculation of volume credits, management of credit accounts (for the organisations applying percentage based methods),
  - sale/transfer of products, on-products claims and on-product labelling,
- (d) procedures for the due diligence system relating to controversial sources,
- (e) procedures for internal audits,
- (f) procedures for complaints resolution.

#### **6.4 Record keeping**

6.4.1 The organisation shall establish and maintain records on its chain of custody to provide evidence of conformity with the requirements of this standard and its effectiveness and efficiency. The organisation shall keep at least the following records relating to the product groups covered by the chain of custody:

- (a) records of all suppliers of certified material, including copies of the suppliers' forest management or chain of custody certificates or other documents confirming the supplier's compliance with the criteria for suppliers of certified material,
- (b) records of all input material, including claims on the material origin and documents associated to the delivery of the input material,
- (c) records of calculation of the certified percentage, transfer of the percentage to output products and management of the credit account, as applicable,
- (d) records of all products sold/transferred, including claims on the material origin and documents associated to the delivery of the output products,
- (e) records of the due diligence system relating to controversial sources, including records of self-declarations, risk assessment and high risk supplies management, as applicable,
- (f) records of internal audits, non-conformities which occurred and corrective actions taken,
- (g) records on complaints and their resolution.

6.4.2 The organisation shall maintain the records for a minimum period of five years.

#### **6.5 Resource management**

##### **6.5.1 Human resources / personnel**

6.5.1.1 The organisation shall ensure and demonstrate that all personnel performing activities affecting the implementation and maintenance of the chain of custody are competent on the basis of appropriate training, education, skills and experience.

*Discussion topic:*

*Chapter 6.5 might be an appropriate place to define PEFC requirements for labour health and safety.*

##### **6.5.2 Technical facilities**

The organisation shall identify, provide and maintain the infrastructure and technical facilities needed for effective implementation and maintenance of the organisation's chain of custody with the requirements of this standard.

#### **6.6 Inspection and control**

6.6.1 The organisation shall conduct internal audits at least annually covering all requirements of this standard and establish corrective and preventive measures if required.

6.6.2 A report on the internal audit shall be reviewed at least annually.

## 6.7 Complaints

6.7.1 The organisation shall establish procedures for dealing with complaints from suppliers, customers and other parties relating to the organisation's chain of custody.

6.7.2 Upon receipt of the complaint, the organisation shall:

- (a) acknowledge the complaint to the complainant,
- (b) gather and verify all necessary information to evaluate and validate the complaint and make decision on the complaint,
- (c) formally communicate the decision on the complaint and of the complaint handling process to the complainant,
- (d) ensure that any appropriate corrective and preventive actions are taken.

*Discussion topic:*

*The obligation of the certified supplier to have in place complaints procedures is given in ISO Guide 65 and does not therefore create a new element in the chain of custody standard. This is important especially when the organisation's claims are not made in compliance with the standard and the customer cannot then consider the supplied material as "certified" material. The complaint procedures can help to resolve the customers concerns and needs.*

## 6.8 Subcontracting

6.8.1 The organisation's chain of custody shall also cover activities of sub-contractors involved in the manufacturing of products covered by the organisation's chain of custody, within or outside the organisation's site.

6.8.2 The organisations may only consider those activities as subcontracting where the subcontractor receives the material from the organisation which is physically separated from other material and returns the material back to the organisation after the subcontracted work is completed or where the organisation remains responsible for the sale or transfer of the product to the customer.

Note 1: An example of subcontracting is outsourcing of cutting and stapling process by a printing house with chain of custody where the printed material is transferred to the subcontractor and returned back to the printing house after the subcontracted activities have been performed.

Note 2: An entity which is either involved in procuring the raw material or sale of the output products is required to implement its own chain of custody.

Note 3: Subcontracting is not considered as being in conflict with chapter 5.1.2.4 that requires the product group to be manufactured at one site.

6.8.3 The organisation shall take full responsibility for the all subcontracted activities.

6.8.4 The organisation shall have a written agreement with all subcontractors ensuring that the organisation's material/products are physically separated from other material or products.

6.8.5 The organisation's internal audit programme shall cover the subcontractor's activities.

## Appendix 1 (Option 1a): Specification of the PEFC claim on “PEFC certified” material

*Discussion topic:*

*The enquiry draft provides three options (1a, 1b and 2) for definition of PEFC claims which include different level of recognition of recycled material. Based on members and public consultation the PEFC Council would need to choose one of those options.*

*All three options are based on the assumption that (i) post and pre consumer recycled material should have the same level of recognition (either as neutral or certified material) and that (ii) there is only one definition for a single claim, i.e. definition of “PEFC certified” material shall always be the same regardless whether it would be used together with “PEFC recycled” claim or separately (no combination of options 1a, 1b and 2).*

*The option 2 represents a significant limitation that no volume credit method can be used. A proposal has been made to have a “PEFC recycled” claim as a single claim that however would not be used together with “PEFC certified” claim, i.e. the company would need to decide to either use “PEFC certified” or “PEFC recycled” claim.*

Normative

### **1 Introduction:**

The specification of this Appendix shall be used together with the requirements of this standard when the organisation establishes a chain of custody to use the PEFC claim on PEFC certified material.

### **2 Formal claim:**

The organisation shall use the claim “**x % PEFC certified**” when communicating the content of PEFC certified material in output products.

### **3 Requirements for the origin categories of input material**

#### **Certified material:**

- (a) forest based material delivered with the supplier’s claim “**x % PEFC certified**” by the supplier with either:
  - i) PEFC recognised certificate or
  - ii) a document confirming that the supplier is covered by the PEFC recognised certificate.
- (b) recycled material.

Note: “a document confirming that the supplier is covered by the PEFC recognised certificate” is applicable in case of regional or group forest management certification and multi-site (group) chain of custody certification where the supplier is provided with a document referring to the scope of the PEFC recognised certificate.

#### **Neutral material:**

Other than forest based material

#### **Other material:**

Forest based material other than certified material

## **Appendix 1 (Option 1b): Specification of the PEFC claim on “PEFC certified” material**

Normative

### **1 Introduction:**

The specification of this Appendix shall be used together with the requirements of this standard when the organisation establishes a chain of custody to use the PEFC claim on PEFC certified material.

### **2 Formal claim:**

The organisation shall use the claim “**x % PEFC certified**” when communicating the content of PEFC certified material in output products.

### **3 Requirements for the origin categories of input material**

#### **Certified material:**

Forest based material delivered with the supplier’s claim “**x % PEFC certified**” by the supplier with either:

- i) PEFC recognised certificate or
- ii) a document confirming that the supplier is covered by the PEFC recognised certificate.

Note: “a document confirming that the supplier is covered by the PEFC recognised certificate” is applicable in case of regional or group forest management certification and multi-site (group) chain of custody certification where the supplier is provided with a document referring to the scope of the PEFC recognised certificate.

#### **Neutral material:**

- (a) Recycled material
- (b) Other than forest based material

#### **Other material:**

Forest based material other than certified material and neutral material.

## **Appendix 1 (Option 2): Specification of the PEFC claim on “PEFC certified” material**

Normative

### **1 Introduction:**

The specification of this Appendix shall be used together with the requirements of this standard when the organisation establishes a chain of custody to use the PEFC claim on PEFC certified material.

### **2 Formal claim:**

The organisation shall use the claim “**x % PEFC certified**” when communicating the content of PEFC certified material in output products.

### **3 Requirements for the origin categories of input material**

#### **Certified material:**

Forest based material delivered with the supplier’s claim “**x % PEFC certified**” by the supplier with either:

- i) PEFC recognised certificate or
- ii) a document confirming that the supplier is covered by the PEFC recognised certificate.

Note: “a document confirming that the supplier is covered by the PEFC recognised certificate” is applicable in case of regional or group forest management certification and multi-site (group) chain of custody certification where the supplier is provided with a document referring to the scope of the PEFC recognised certificate.

#### **Neutral material:**

Other than forest based material

#### **Other material:**

Forest based material other than certified material.

## Appendix 2 (Option 2): Specification of the PEFC claim on “PEFC recycled” material

Normative

### 1 Introduction:

The specification of this Appendix shall be used together with the requirements of this standard when the organisation establishes a chain of custody to use the PEFC claim on PEFC recycled material.

### 2 Formal claim:

The organisation shall use the claim “**x % PEFC recycled**” when communicating the content of PEFC recycled material in output products.

### 3 Requirements for the origin categories of input material

#### Certified material:

- (a) recycled material reclaimed directly from consumers, manufacturing facilities which generated it, recycling facilities or collection centres:
  - i) where non-chemical contaminants are absent,
  - ii) whose chemical characterisation is known and complies with existing regulations for chemical contamination when and where they apply.

Note 1: The absence of non-chemical contaminants such as soil, concrete, slate, stones, textile, plastic, rubber or metal is ensured by: (1) avoiding of collecting the non-chemical contaminants, (2) visual control and removal of the non-chemical contaminants on the entry of waste pre-processors centres and (3) visual control and removal of the non-chemical contaminants on the entry of reclaimed raw material processors (wood based panels units, pulp mills, etc.). National specification, when and where they apply, shall be used for the determination of the relevant amount of non-chemical contaminants (e.g. UK specification document PAS 104 published by British Standards Institution, BSI - 2004).

Note 2: As the technology is still being developed to allow post consumer wood raw material users to carry out practical testing to detect low levels of chemical contamination, the post-consumer reclaimed raw material shall be tested for the chemical contamination using the available and cost effective methods.

The limit values of chemical contamination shall comply with existing regulations. Other specifications for chemical contamination of post-consumer raw material shall be considered if available and applicable (e.g. European Panel Federation standard on the use of recycled wood in wood-based panels).

- (b) Forest based material delivered with the supplier’s claim “**x % PEFC recycled**” by the supplier with either:
  - i) PEFC recognised (chain of custody) certificate or
  - ii) a document confirming that the supplier is covered by the PEFC recognised certificate.

Note: “a document confirming that the supplier is covered by multi-site (group) chain of custody certification where the supplier is provided with a document referring to the scope of the PEFC recognised certificate.

#### Neutral material:

Other than forest based material

#### Other material:

Forest based material other than certified material.

## Appendix 3: PEFC Due Diligence System (DDS) for avoidance of raw material from controversial sources

Normative

### 1 Scope

1.1 This appendix provides requirements for the PEFC Due Diligence System which is required to be implemented by all organisations implementing this chain of custody standard for all input forest based material of those product groups which are covered by the organisation's chain of custody and for which percentage based method has been applied, with the exception of:

- (a) certified material/products delivered by the supplier's with PEFC recognised certificates,
- (b) recycled material.

1.2 This appendix may also be implemented by organisations without chain of custody for the purposes of third party certification by PEFC notified certification bodies.

1.3 The organisation shall clearly identify the product groups for which the PEFC DDS is being implemented.

1.4 The organisation implementing the requirements for the PEFC DDS shall not apply on-product claims relating to the origin of material in non-controversial sources. The organisation may only communicate information on implementation and maintenance of PEFC DDS with respect to specific product groups.

1.5 The organisation's PEFC DDS shall be supported by the organisation's management system meeting requirements of chapter 6 of this standard.

1.5 The organisation shall implement the PEFC DDS in three steps relating to:

- (a) supplier's self-declarations,
- (b) risk assessment and
- (c) management of high risk supplies.

1.6 The organisation procuring raw material originating from threatened and endangered species classified by CITES shall follow all the regulations defined by CITES and other international conventions as well as national legislation.

1.7 The organisation shall not include any wood based material from genetically modified organisms in the product group covered by the organisation's PEFC DDS.

### 2 Self-declaration of suppliers

2.1 The organisation shall require from all suppliers of material covered by the scope of the PEFC DDS, a signed self-declaration that the supplied material does not originate from a controversial source with the exemption applying to supplies delivered directly from forest owners of the organisation's own country where the organisation demonstrates that the country is representing "low" risk based on risk management criteria of the PEFC DDS.

2.2 The supplier's self-declaration shall include:

- (a) a written statement that to the best of the supplier's knowledge the supplied material does not originate from controversial sources,
- (b) a written commitment to provide information on the geographical origin (country / region) of the supplied raw material which is necessary information for the organisation's risk assessment,
- (c) a written commitment that, in the case where the supplier's supplies are considered as "high" risk, the supplier will provide the organisation with necessary information to

identify the forest management unit(s) of the raw material and the whole supply chain relating to the “high” risk supply.

- (d) a written commitment, where the supplier’s supplies are considered as “high” risk, the supplier will enable the organisation to carry out a second party or a third party inspection of the supplier’s operation as well as operations of the previous suppliers in the chain.

Note: The term “region” used throughout this appendix refers to a sub-national level.

2.3 Where the organisation has signed contracts with its suppliers, the requirements of chapter 2.2 shall be covered by the contract documentation.

**3 Risk assessment**

3.1 The organisation shall carry out the risk assessment of procuring raw material from controversial sources for all input material of the product group(s) covered by the scope of the PEFC DDS.

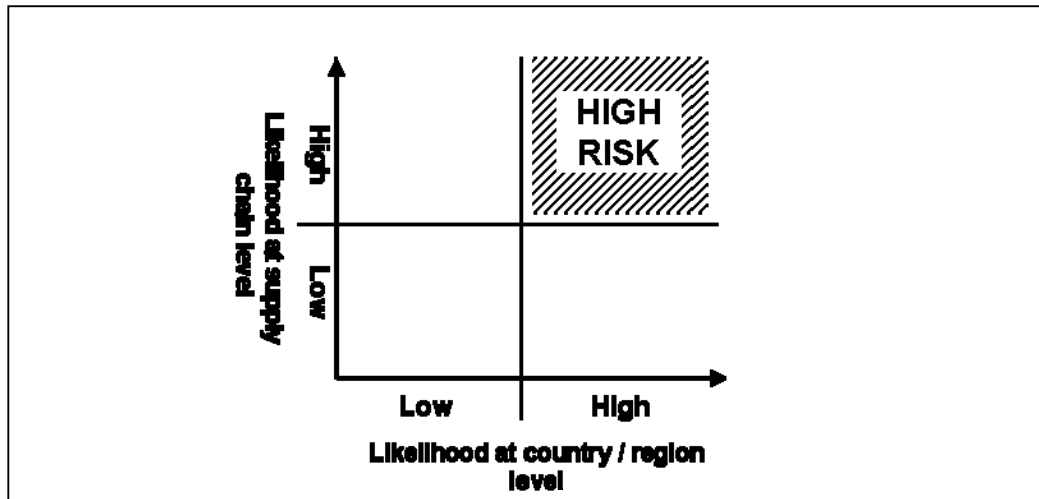
3.2 The organisation’s risk assessment shall result in the classification of supplies into the “low” or “high” risk category.

3.3 The organisation’s risk assessment shall be carried out based on an evaluation of:

- (a) the likelihood that activities defined under the term controversial sources occur in the country / region of the supply (hereinafter referred to as the likelihood at country / region level) and;
- (b) the likelihood that the supply chain has not been able to identify a potential controversial source of supply (hereinafter referred to as the likelihood at the supply chain level).

3.4 The organisation shall determine the risk, based on the combination of the likelihood at country / region level and the likelihood at the supply chain level in order to classify all supplies as “high” risk where both the likelihood at the country / region level and the likelihood at the supply chain are assessed as “high” (See Diagram 1).

Diagram 1: Determination of “high” risk supplies by combination of likelihood at country / region level and supply chain level



3.5 The organisation shall classify the likelihood at country / region level as “high” for all supplies where any of the following indicators in Table 1 apply.

Table 1: List of indicators for “high” likelihood at country / region level

Indicators	Examples of external reference sources
The country / region is covered by a UN	At the time of the publication of this standard, there is no UN Security Council resolution relating to ban of timber

Security Council ban on timber exports.	exports. The organisation is required to verify the current status from the UN official sources (e.g. UN website).
The actual corruption perception index (PCI) of the country presented by Transparency international (TI) is lower than 5.0.	The TI PCI is presented at <a href="http://www.transparency.org">www.transparency.org</a> .
The country / region is known as a country with low level of forest governance and law enforcement.	In defining this indicator, the organisation can use its internal surveys or results of surveys of external governmental or non-governmental organisations active in monitoring forest governance and law enforcement and corruption such as <ul style="list-style-type: none"> <li>- The World Bank (<a href="http://info.worldbank.org/governance/kkz2004/sc_country.asp">http://info.worldbank.org/governance/kkz2004/sc_country.asp</a>);</li> <li>- UK based Chatham House, (<a href="http://www.illegal-logging.info">www.illegal-logging.info</a>);</li> <li>- Environmental Investigation Agency (<a href="http://www.eia-international.org">www.eia-international.org</a>), Global Witness (<a href="http://www.globalwitness.org">www.globalwitness.org</a>), etc.</li> </ul>
The country is one where official FAO statistics show a decrease in forest area	FAO Global Forest Resources Assessment 2005 ( <a href="ftp://ftp.fao.org/docrep/fao/008/A0400E/A0400E14.pdf">ftp://ftp.fao.org/docrep/fao/008/A0400E/A0400E14.pdf</a> )
The organisation has received comments supported by reliable evidence from their customers or other external parties, relating to its supplies with respect to controversial sources, which have not been disproved by the organisation's own investigation.	

*Discussion topic:*

*An explicit threshold for corruption has been added to the table. As high risk countries will be considered all the countries with Transparency International lower than 5.0. Out of 180 countries only 58 are above the 5.0 threshold, excluding for example Italy, Poland, Latvia, Greece, etc.*

3.6 The organisation shall classify as "high" the likelihood at the supply chain level for all supplies where **none** of the indicators in Table 2 (below) apply.

Table 2: List of indicators for "low" likelihood at supply chain level

Indicators	Evidence and / or reference to external sources
Supplies declared as certified against a forest certification scheme (other than PEFC endorsed) supported by a forest management or chain of custody certificate issued by a third party certification body.	The organisation shall be able to provide evidence that the certification scheme includes: <ul style="list-style-type: none"> <li>(a) third party certification of forest management which covers activities defined by the term controversial sources,</li> <li>(a) third party certification of chain of custody,</li> <li>(b) a verification mechanism that non-certified raw material does not originate from controversial sources where percentage based claims apply.</li> </ul> Examples of PEFC non-endorsed forest certification schemes: Forest Stewardship Council, etc.
Supplies verified by governmental or non-governmental verification or licensing mechanisms other than forest certification schemes focused on activities covered by the term controversial sources.	The organisation shall be able to provide evidence on the scope of the verification or licensing mechanism. <p>Examples of verification and licensing mechanisms:</p>

	<p>- EU FLEGT (<a href="http://ec.europa.eu/environment/forests/flegt.htm">http://ec.europa.eu/environment/forests/flegt.htm</a>) - Tropical Forest Trust (<a href="http://www.tropicalforesttrust.com">www.tropicalforesttrust.com</a>)</p>
Supplies supported by verifiable documentation which clearly identifies all suppliers within the supply chain, forest management unit of the supply origin and provides sufficient evidence on compliance with legal requirements.	Evidence on compliance with legal requirements can be a statement from the law enforcement authority on legal compliance or absence of non-compliance, harvest permit issued or forest management plan approved by the relevant law enforcement authority.

#### 4 Management of high risk supplies

##### 4.1 General

4.1.1 The organisation shall establish a second or third party verification programme for supplies classified as “high” risk. The verification programme shall cover:

- (a) identification of the whole supply chain and forest management unit(s) of the supply’s origin;
- (b) on-site inspection and
- (c) corrective and preventive measures.

##### 4.2 Identification of the supply chain

4.2.1 The organisation shall require, from all suppliers of “high” risk supplies, detailed information on the whole supply chain and forest management unit(s) of the supply’s origin. The information submitted shall allow the organisation to plan and execute on-site inspections.

##### 4.3 On-site inspections

4.3.1 The organisation’s verification programme shall include on-site inspections of suppliers delivering “high risk” supplies. The on-site inspections can be carried out by the organisation itself (second party inspection) or by a third party on behalf of the organisation. The organisation may substitute the on-site inspection with documentation review where the documentation provides sufficient confidence in the material origin in non-controversial sources.

4.3.2 The organisation shall demonstrate having sufficient knowledge and competence in the legislation applicable to the origin of the “high” risk supplies and relevant to the definition of the controversial source.

Note: Where the on-site inspection is carried out by a third party on behalf of the organisation, the organisation shall demonstrate that the third party has sufficient knowledge and competence in the legislation as required by chapter 4.3.2.

4.3.3 The organisation shall determine a sample of supplies to be verified by the verification programme for each supplier of high risk supplies. The size of the sample for each supplier of high risk supplies shall be at least the square root of the number of “high” risk supplies:  $(y=\sqrt{x})$ , rounded to the nearest whole number. Where the previous on-site inspections proved to be effective in fulfilling the objective of this document, the size of the sample may be reduced by a factor of 0.8, i.e.:  $(y=0.8 \sqrt{x})$ , rounded up to the next whole number.

4.3.4 The on-site inspections shall cover:

- (a) the direct supplier and all previous suppliers in the supply chain in order to assess compliance with the supplier claims on the origin of the raw material and;
- (b) the forest owner / manager of the forest management unit of the supply origin or any other party responsible for management activities on that forest management unit in order to assess their compliance with legal requirements.

#### 4.4 Corrective and preventive measures

4.4.1 The organisation shall define written procedures for implementing corrective measures for non-compliance for suppliers identified by the organisation's verification programme.

4.4.2 The range of corrective measures shall be based on the scale and seriousness of the non-compliance and should include the following:

- (a) communication of the non-compliance with a request for improvements;
- (b) requiring suppliers to define corrective measures relating to forest management unit's compliance with legal requirements or efficiency of the information flow in the supply chain;
- (c) cancellation of use of the supplier's supplies.

4.4.3 The organisation shall cancel the supply from those suppliers which have not provided a self-declaration as required by Chapter 2 or have not provided information on the supply chain as required by chapter 2.2.

## Appendix 4: Implementation of the chain of custody standard by organisations with multiple production locations

Normative

### 1 Introduction

The aim of this appendix is to establish guidance for the implementation of the chain of custody requirements in an organisation with a network of sites, thus ensuring on the one hand, that the certification of the chain of custody is practical and feasible in economic and operative terms and on the other, that the assessment provides adequate confidence in the conformity of the chain of custody. Certification of organisations with multiple production locations also allows implementation and certification of the chain of custody in a group of typically small independent companies.

This appendix only includes requirements for implementation the chain of custody requirements which are applicable to the organisations with multiple production locations.

Requirements and guidance for the certification bodies for the assessment and certification of the organisations with multiple production locations are described in the PEFC / IAF Guidance on the Application of ISO / IEC Guide 65 (*the document identification and title to be added*).

### 2 Definitions

2.1 An organisation with multiple production locations is defined as an organisation having an identified central function (normally, and hereafter referred to as a “central office”) at which certain activities are planned, controlled and managed and a network of local offices or branches (sites) at which such activities are fully or partially carried out.

2.2 The organisation with multiple production locations does not need to be a unique entity, but all sites shall have a legal or contractual link with the central office and be subject to a common chain of custody which is subject to continuous surveillance by the central office. This means that the central office has the right to implement corrective actions when needed at any site. Where applicable this should be laid down in the contract between the central office and the sites.

2.3 The organisation with multiple production locations covers:

- (a) multisite organisations such as organisations operating with franchises or companies with multiple branches and
- (b) producers group of independent legal enterprises (producers group).

2.4 The producers group means a network of typically small independent enterprises which have associated together for the purpose of obtaining and maintaining chain of custody certification. The central office may be an appropriate trade association, or any other properly experienced legal entity that is either nominated for the purpose by a group of intending members or offers a group service managed for the purposes of and consistently with this standard. The central office can also be administered by one member of the group.

Note:

The central office in case of the producers group called the group entity and sites are called “group members”.

#### **Discussion:**

*The organisation with multiple production sites covers two approaches:*

*multisite organisations where the sites are linked through a common ownership or other organisational form, and*

*group of independent legal entities which is established and functioning for the purposes of the chain of custody certification..*

*For both approaches there are the same requirements relating to the function and responsibilities of the central office (group entity) and sites (group members). Those requirements should ensure that the central office has obtained sufficient control over the implementation and performance of the chain of custody at each site and that the sampling approach can be applied by the certification body as a mean of evaluation.*

2.5 The producers group is limited to participation of group members which:

- (a) have no more than 15 employees (including full time, part time, and seasonal staff) or
- (b) have no more than 25 employees and an turnover of Euro 1,000,000.

**Discussion:**

*The site's size limitation is included in the EA draft (draft 1) paper for organisation with multiple production locations. The purpose of this limitation is to only allow the "group certification" to small companies which could be discriminated from certification by the mean of costs born from the certification.*

*The proposal is supported for example by PEFC Belgium. SFI supports the threshold to be set at less than 100 employees.*

2.6 The organisation with multiple production sites shall only include sites located in a single country.

**Discussion:**

*The location of sites in a single country is included in the EA draft (draft 1) paper for organisation with multiple production locations. The purpose of this limitation is caused by the paper's origin in FSC's procedures and applicability of the limitation to other sectors such as food sectors where national regulations play an important role within the certification requirements. This might not be applicable to chain of custody requirements with an exemption if social and labour requirements are added to the chain of custody standard.*

**3 Eligibility criteria for the organisation with multiple production sites**

**3.1 General**

3.1.1 The organisation's chain of custody shall be centrally administered and be subject to central review. All the relevant sites (including the central administration function) shall be subject to the organisation's internal audit program and shall have been audited in accordance with that program prior to the certification body starting its assessment.

3.1.2 It shall be demonstrated that the central office of the organisation has established a chain of custody in accordance with this standard and that the whole organisation (including all the sites) meets the requirements of the standard.

3.1.3 The organisation shall be able to demonstrate its ability to collect and analyse data from all sites including the central office authority and ability to initiate changes in the chain of custody operating in the sites if required.

**3.2 Function and responsibilities of the central office**

3.2.1 The central office shall:

- (a) represent the organisation with multiple production sites in the certification process, including communication and relationship with the certification body;
- (b) submits an application for the certification and its scope, including a list of participating sites,
- (c) ensures contractual relationship with the certification body,
- (d) submits to the certification body a request for extension or reduction of the certification scope, including coverage of participating sites,

- (e) provide a commitment on behalf of the whole organisation to establish and maintain a chain of custody in accordance with the requirements of this standard,
- (f) provide all the sites with information and guidance needed for effective implementation and maintenance of the chain of custody in accordance with this standard; The central office shall provide the sites with the following information or access to the following information:
  - a copy of the chain of custody standard and any guidance relating to the implementation of the requirements of the standard,
  - PEFC Logo usage rules and any guidance relating to the implementation of the PEFC Logo usage rules,
  - a central office's procedures for the management of the organisation with multiple production sites,
  - conditions of the contract with the certification body relating to the rights of the certification body or accreditation body to access the sites' documentation and installations for the purposes of evaluation and surveillance, and disclosure of information about the sites to a third party,
  - results of the internal audit programme and the certification body's evaluation and surveillance and relating corrective and preventive measures applicable to individual sites,
  - certification document and any of its parts relating to the scope of certification and coverage of sites.
- (g) provide organisational or contractual connection with all the sites, which shall include commitments by the sites to implement and maintain the chain of custody in accordance with this standard. The central office shall have a written contract or other written agreement with all the sites which covers the right of the central office to implement and enforce any corrective or preventive measures and to initiate the exclusion of any site from the scope of certification in case of nonconformities with this standard,
- (h) establish written procedures for the management of the organisation with multiple production sites,
- (i) keep records relating to the central office and sites compliance with the requirements of the standard,
- (j) operate an internal audit programme. The internal audit programme shall provide for:
  - on-site audit of all the sites (including its own central administration function) prior to certification body starting its evaluation,
  - on-site audit annual audits of all the sites covered by the certification scope,
  - on-site audit of any new site prior the certification body starting the process of the certification scope extension,
- (k) operate a review of the central office and sites conformity, including review of results of the internal audits programme and certification body's evaluations and surveillance; shall establish corrective and preventive measures if required; and shall evaluate the effectiveness of corrective actions taken.

### **3.2.2 Function and responsibilities of sites**

Sites connected to the organisation with multiple production sites shall be responsible for:

- (a) implementation and maintenance of the chain of custody requirements in accordance with this standard,
- (b) entering into contractual relationship with the central office, including commitment on the compliance with the chain of custody requirements and other applicable certification requirements,

- (c) responding effectively to all requests from the central office or certification body for relevant data, documentation or other information whether in connection with formal audits or reviews or otherwise,
- (d) providing full co-operation and assistance in respect of the satisfactory completion of internal audits performed by the central office and audits performed by the certification body, including access to the sites installations,
- (e) implementation of relevant corrective and preventive actions established by the central office.

**4 Scope of responsibilities for requirements of this standard implemented in the organisation with multiple production sites**

Standard requirements	Central office	Site
4 Requirements for chain of custody process – physical separation method		Yes
5 Requirements for chain of custody process – percentage based method		Yes
6 Minimum management system requirements		
6.2 Responsibilities and authorities	Yes	Yes
6.2.1 Management responsibilities	Yes	Yes
6.2.2 Responsibilities and authorities	Yes (for d and e)	Yes
6.3 Documented procedures	Yes (for a, e and f)	Yes
6.4 Record keeping	Yes (for f and g)	Yes
6.5 Resource management		
6.5.1 Human resources / personnel	Yes (only for activities provided)	Yes
6.5.2 Technical facilities		
6.6 Inspection and control	Yes	Yes
6.7 Complaints	Yes	Yes

## **Appendix 5: Guidance for the implementation of PEFC chain of custody for specified projects**

Informative

### **1 Introduction**

This Appendix provides guidance on the implementation of the requirements of this standard for any specifically defined project where certified material is used.

The implementation and certification of the PEFC chain of custody at the project level is specific in that it is only linked to and valid for a time and site specific project for which the claim(s) is made rather than on-going and continuous production or trade of certified products.

The information given here should be read in conjunction with the normative part of this standard which provides the definitive normative requirements.

### **2 Terms and definitions**

The relevant definitions of this standard apply, together with the following definitions specific to this Guidance:

#### **2.1**

##### **Controlling entity**

A controlling entity is an organisation which has overall control and management of a specifically defined project.

#### **2.2**

##### **Project**

A project is a clearly defined tangible product; or its part which forming a functional unit, or group of related products forming a functional unit, manufactured and/or assembled at one particular site (exceptionally at an integrated series of sites, e.g. a ship built at one site and fitted out at another).

Note 1: The term “project” used in this guidance is equivalent to the term product group used in this standard.

Note 2: Examples of a project include: a ship, a new building such as stadium or office building, the refurbishment of such a ship or building, etc. An example of “a part of the product” includes roofing of an building. An example of “group of related products” a building complex at one site.

#### **2.3**

##### **Project member**

A Project member is an organisation involved in the procuring and installing of raw material or products for a specifically defined project. The term does not include organisations involved in the manufacturing or replacing of products at a location other than the project site or sites.

### **3 Basis for implementation of project chain of custody**

#### **3.1 Application of chain of custody methods**

3.1.1 Any one project will entail a range of different suppliers providing differing contents of certified materials. In such circumstances physical separation is not applicable. The project chain of custody is therefore based on percentage based method where the claim percentage is based on the total input of certified material for the whole project enabling a single claim to be made based on for the proportion of certified material involved in the project.

### 3.2 Percentage based method

#### 3.2.1 Project

3.2.1.1 This standard requires that chain of custody requirements shall be implemented for a specific product group. In the case of the project chain of custody the specific project is considered to be the product group to which the chain of custody process is applied. The chain of custody process entails the identification and quantification of (a) certified, (b) neutral and (c) other material utilised which is used in the calculation of the claim percentage.

3.2.1.2 The project is limited to:

- (a) the product, or part or group of products, covered by the chain of custody,
- (b) the single site at which the project was manufactured or assembled,
- (c) the time period over which the project was manufactured or assembled.

3.2.1.3 The project corresponds to the product, construction or part thereof for which the project chain of custody claim is made. Examples are given below:

The coverage of the project	Chain of custody claims
The whole building, e.g. the Olympic stadium, including supporting material	x % of the woody raw material used in the Olympic stadium construction, including supporting material, was PEFC certified.
Roof element of the housing project "abc"	x % of the woody raw material used in the roof element of housing project "abc" was PEFC certified.
Reconstruction of the ship "xyz"	x % of the woody raw material used in the reconstruction of ship "xyz" was PEFC certified.

3.2.1.4 The project can cover several products (e.g. several buildings), however in such a case, all of them shall together form a single functional unit.

3.2.1.5 The claim period corresponds to the time period during which the project was being manufactured or assembled.

#### 3.3 Identification of origin

3.3.1 The controlling entity is responsible for ensuring that all materials procured for the project, either directly by that entity or by other project members, are identified and verified as being (a) certified, (b) neutral or (c) other as defined in this standard.

3.3.2 For each delivery the identification covers supplier, date of delivery, volume (or weight) and a formal claim, including percentage of certified material.

3.3.3 For each supplier of certified material the identification also includes verification of the supplier's compliance with the criteria for the supplier of certified material such as PEFC recognised forest management or chain of custody certificates.

3.3.4 The project members are responsible for providing the controlling entity with verifiable information on the receipt of all input material as a part of this overall identification of inputs to the projects.

#### 3.4 Calculation of certified percentage

3.4.1 The claim percentage for the project is calculated as a simple percentage in compliance with this standard, i.e. from input material delivered to and used in the specific project.

3.4.2 The claim percentage calculation is based on a single common unit of measurement for all material covered by the calculation. Where a complex variety of products have been incorporated in the project, the determination of such a single measurement unit can be difficult. If the controlling entity is able to demonstrate that a common volume or weight measurement unit cannot be found, either based on an official or on an internally derived conversion ratio, then the calculation can be based on values in a single monetary currency.

Note: The certification body reviews the justification for a decision by the controlling entity to use monetary values and requires evidence to demonstrate that a common unit in volume, weight or other appropriate terms could not be found.

### **3.5 Transfer of the calculated percentage to output**

3.5.1 The claim percentage is transferred, in compliance with this standard, to the output product (“the defined project”) using the average percentage method. This means that the calculated claim percentage refers and is communicated to the whole project and cannot be distributed to its constituent parts

### **3.6 Sale of products (including communication of claims)**

3.6.1 The final calculation of the simple percentage of certified material by the controlling entity can only be done after the completion of the project when all materials have been procured, delivered and identified as (a) certified, (b) neutral or (c) other material.

3.6.2 The controlling entity can however obtain a chain of custody certificate to indicate the expected certified percentage before the completion of the project if they are able to demonstrate the expected certified percentage based on commitments, specifications and contractual relationship with its suppliers entered into during the planning stage of the project. The compliance between the planning stage claims and the final calculation based on delivered material is verified by the controlling entity as a part of the internal audit and subsequently by a certification body during the third party audits.

3.6.3 The controlling entity can only use the label / logo based on valid authorisation / licence from the label/logo owner.

Note 1: Where the PEFC Logo is used, the controlling entity shall have valid PEFC Logo licence issued by the PEFC Council or the PEFC National Governing Body on its behalf.

Note 2: Any usage of the PEFC Logo with reference to the specific project is considered as an ‘on-product usage’ and can only be applied when the content, or expected content (see above), of PEFC certified material exceeds 70 %.

3.6.4 Both the communication of the percentage content of certified material and the usage of the logo / label of the project should include a claim on the “expected” percentage content calculated during the planning stage.

### **3.7 Controversial sources**

3.7.1 The controlling entity is responsible for due diligence system to ensure that other than certified products supplied to the project through the controlling entity or through a project member does not originate from controversial sources.

3.7.2 The controlling entity and project members are responsible for obtaining from their suppliers self-declarations for other than certified products that they do not originate from controversial sources. The project members provide any such self-declarations to the controlling entity.

3.7.3 The controlling entity is responsible for carrying out a risk assessment for the all supplies of other than certified products delivered directly to the controlling entity or to the project members. The controlling entity also carries out a subsequent second or third party verification programme where the risk has been classified as high. The controlling entity should enter into a contractual, or other agreed relationship, with project members whereby it can implement such second or third party verification programmes for the supplies delivered through the project members.

## **4 MANAGEMENT RESPONSIBILITIES**

4.1 The controlling entity is required to establish a management system in accordance with this standard to ensure correct implementation and maintenance of the project chain of custody process. The management system also covers activities performed by project members.

**Scope of responsibilities for the requirements of this standard**

Responsibilities	Controlling entity	Project member
<b>5</b>	<b>Chain of custody process - percentage based method</b>	
5.1.2	Definition of the Project	Yes
		No
5.2	Identification of the origin of supplied raw material	Yes
		Yes (for its own supplies)
5.3	Calculation of the certification percentage	Yes
		No
5.4	Transfer of the certification percentage	Yes
		No
5.5	Sale and communication (including PEFC Logo usage)	Yes
		No
5.6	Controversial sources	Yes
	Self declaration	Yes
	Risk assessment	Yes
	2 <sup>nd</sup> and 3 <sup>rd</sup> party verification	Yes
<b>6</b>	<b>Management system requirements</b>	
6.2	Management responsibilities	Yes
		No
6.3	Documented procedures	Yes
		No
6.4	Record keeping	Yes
		No (provides records on supplied material to the controlling entity)
6.5	Resource management	Yes
		No
6.6	Inspection and control	Yes
		No
6.7	Complaints	Yes
		No