



PEFC WEBINAR SERIES ON THE REVISED PEFC CHAIN OF CUSTODY STANDARD AND LOGO USE RULES

16th, 22nd and 23rd February 2011

Questions & Answers

TRANSITION PERIOD

Q: From which date on will an Annex 4 Chain of Custody (CoC) certificate not be recognized by PEFC anymore?

A: The PEFC Council requires that after 26th November 2011 all certified entities shall follow requirements of the new standards. After 26th November 2011 certification bodies shall carry out all their audits (initial, surveillance and recertification) against the new standard.

Q: As a certified organization, can we accept our supplier's claims made against Annex 4 after 26th November 2011? Also after 26th November 2011, can we accept our supplier's claims made against PEFC ST 2002:2010 if our supplier has not obtained a certificate issued against PEFC ST 2002:2010 so far, but has only been audited against Annex 4?

A: After 26 November 2011, all certified organizations shall follow the new standard and claim "x % PEFC certified." The claim "x % PEFC certified" does not conflict the requirements of Annex 4.

Q: If the next surveillance audit is before 26 November 2011, can the company choose against which standard it gets checked?

A: Yes. Until 26 November 2011, the certified organization can choose against which standard it is audited.

Q: Can the certification body limit its PEFC chain of custody certification services to the new standard before 26 November 2011?

A: It is expected that the certification body can implement a shorter transition period than as required by the PEFC Council.

SCOPE (Ch. 1)

Q: What about biomass certification and pellet certification?

A: Both biomass and pellets are products within the scope of the PEFC chain of custody, i.e. forest based products and as such the PEFC chain of custody can be applied to those products.

TERMS AND DEFINITIONS (Ch. 3)

CONTROVERSIAL SOURCES (3.7)

Q: How does PEFC define a plantation?

A: PEFC ST 2002:2010 does not have its own definition of “forest plantation”. This term is defined in PEFC ST 1003:2010 and should also apply for the purposes of the chain of custody standard.

PEFC ST 1003:2010, Ch. 3.1, Forest plantation/timber plantation/productive plantation:

Forest or other wooded land of introduced species, and in some cases native species, established through planting or seeding mainly for production of wood or non-wood goods.

Note 1: Includes all stands of introduced species established for production of wood or non-wood goods.

Note 2: May include areas of native species characterised by few species, intensive land preparation (e.g. cultivation), straight tree lines and/or even-aged stands.

Note 3: Application of the definition requires consideration of national forestry terminology and legal requirements.

“SUPPLIER” (3.22)

Q: For the whole Chain of custody, if it involves different parties between supplier (e.g. paper mill) and customer (e.g. printer), and if those parties (e.g. trading co.) are only involved in documentation and money transaction but not involve in the goods itself (indeed.the goods are transported directly from supplier to customer), should those "middle" parties need to be Chain of custody certified?

A: The organization (as per PEFC ST 2002:2010) shall decide and be able to clearly identify who is the supplier of the specific delivery. The supplier of the PEFC certified material/product shall provide the organization with the delivery documentation that meets the requirements of chapter 4.2.1 (5.2.1).

The printer (as the organization) can consider the paper mill as the supplier of PEFC certified material, where the material is delivered directly to the printer and is accompanied by a delivery documentation (e.g. delivery note) that clearly indicates the paper mill as being the supplier of the

delivery and the printer as the customer of the delivery and where the delivery documentation would include all information required by 4.2.1 (5.2.1).

Q: As observed from pt. 3.22 to define the definition of supplier, is it only a single supplier is "appointed" as supplier, so the parties in the middle (which are only involved in only money transaction/ documentation) do not need to be PEFC chain of custody certified?

A: For the purposes, the organization can only consider one entity as the supplier of material for one delivery. Other entities are not considered within the chain of custody.

Q: If an uncertified publisher buys PEFC certified paper and the paper is delivered directly from a certified mill to a certified printer with supporting documents, can the publisher use the paper and the printers certificate number for an on-product claim?

A: Only an entity with the PEFC chain of custody certificate can claim material as "PEFC certified". An uncertified publisher can ask the printer to put the PEFC label and/or claim on product.

"RECYCLED MATERIAL" (3.19)

Q: The standard requires the content of recycled material to be calculated according to ISO 14021. Do certification bodies need to seek accreditation to ISO 14021?

A: For the purpose PEFC chain of custody certification certification bodies shall have accreditation covering the PEFC chain of custody standard (PEFC ST 2002:2010).

IDENTIFICATION OF THE ORIGIN OF CERTIFIED MATERIAL/PRODUCTS (Ch. 4.2/5.2)/ SALE AND COMMUNICATION ON CERTIFIED PRODUCTS (Ch. 4.4/5.5)

Q: Regarding the requirement to have a copy of the suppliers' certificates, or have access to them, is it sufficient to look up the suppliers on the PEFC certificate database?

A: The PEFC database available at <http://register.pefc.cz/> does not include copies of certificates and as such does not satisfy the requirement for having access to a copy of the certificate.

Q: Certificates can be suspended before the date that's mentioned on the certificate. Is it not better to check the validity at the PEFC information register?

A: The certification decision and any decision on suspension, reduction of scope or withdrawal of certificates is taken by the respective certification body and not by the PEFC Council. Therefore the only body which can provide definitive information on the validity of a certificate is the certification body.

Q: Can the logo license number also be used instead of the certificate number on sales documentation?

A: No. The license number issued by the PEFC authorized body refers to the right of an entity to use the PEFC Logo and not to the valid certification.

Q: PEFC ST 2002: 2010, 4.4.1.3 (g): Is a PEFC License code considered "other document confirming the supplier's certified status"?

A: The license agreement between the PEFC authorized body and an entity is not a document confirming certified status, but the right to use the PEFC Logo. "Other document confirming the certified status" can, for example, be a document (e.g. sub-certificate) confirming that the entity is a part of a group or multisite certification.

Q: Is it acceptable for an organization to decide to use any form other than invoice or delivery document to communicate the Chain of custody claim to customers, if all the required information included?

A: The organization can choose a type of document to communicate the chain of custody claim. It shall however include all information required by the standard (4.4.1.3, 5.5.1.3) and the organization shall use a single type of document and ensure that the document with the chain of custody claim is issued only to one customer (e.g. in situation where an invoice and a delivery note is issued to different organizations).

Q: Does the new requirement to identify the claim and supplier certification on the delivery note apply to both the packaging slip AND the supplier invoice?

A: No, the requirement applies to the single documentation associated with sold/transferred products as defined by the organization. This can be either the delivery note or the invoice, or another document.

Q: We use the “threshold method” (>70%). Which figure should now be written on documents?

A: “70 % PEFC certified”

PERCENTAGE BASED METHOD (Ch. 5)

DEFINITION OF THE PRODUCT GROUP (5.1.2)

Q: Can you clarify the make up of a batch with an element of recycled material, certified material and due diligence material, i.e. is it possible to mix all three and make a certified claim?

A: Yes. The product group is defined as a group of products that consists of the input same material. This means that all products in one product group shall include the same input material but it does not mean that the product would need to include only one type of input material.

Q: In the definition of the product group it says "single production site". Does that mean that two sites in a company can't make components that contribute to the final product?

A: If two sites make components which then contribute to a final product, the company needs to have a product group defined at each site, and then to define a subsequent product group in which the components are “assembled” into the final product.

CALCULATION OF THE PERCENTAGE (5.3)

Q: Is the period for calculating the rolling average % claim now 3 months compared to 12 months - could you expand?

A: There is no difference between the old and new standard.

The old standard required that a rolling average for a specific production batch be calculated from input material procured during the preceding 12 months (as maximum). The term “production batch” included a 3 month period.

The new standard’s (PEFC ST 2002:2010) definition of “product group” does not include the time element and it is therefore necessary to define the calculation of the rolling average for the specific product group and “claim period” (3 months).

MINIMUM MANAGEMENT SYSTEM REQUIREMENTS (Ch. 6)

Q: What are the "minimum requirements" concerning documented complaints procedures - taking into account the large number of very small companies?

A: Minimum requirements are defined in Chapter 6.7 of PEFC ST 2002:2010, Complaints.

Q: At the time of initial audit shall internal audits already have been carried out by the organization?

A: Yes. The initial audit evaluates the implementation of the requirements of the chain of custody standard.

Q: Does the subcontractor need to be included in the internal audit and other aspects of the chain of custody management system?

A: The standard requires that internal audits shall cover all elements of the standard (6.6.1 of PEFC ST 2002:2010). Whether internal audits need to cover on-site visits of the subcontractor facility depends on the scope of subcontracting (e.g. where the organization (printing house) subcontracts stapling or laminating of printed material, it is evident without the on-site audit that the subcontractor cannot exchange the organization's product or mix it with other products).

Q: May Chain of custody outsourcing include processes which do not return products to the certified organization?

A: Note 2 of chapter 6.8.2 of PEFC ST 2002:2010 explains that subcontracting also covers the situation where the subcontractor receives the material directly from the supplier on behalf of the organization or sends it to the customer on behalf of the organization. The subcontractor cannot be, however, responsible for the procurement or sale of products.

SPECIFICATION OF "PEFC CERTIFIED" MATERIAL (Appendix 1)

Q: Is reclaimed material according CEPI EN 643 automatically PEFC certified material?

A: Note 3 of Definition 3.19 explains that material classified under grades of recovered paper as according to EN 643 is recognized as meeting the definition of recycled material.

Q: If ISO 14021 is to be used to verify recycled content, is it expected that Certifying Bodies would also issue a certificate to ISO 14021, or simply use it as a guideline?

A: PEFC ST 2002:2010 requires that the organization shall calculate the content of recycled material based on ISO 14021 not to have a certificate according to ISO 14021.

Q: In Annex 4, companies that solely purchased and sold products, without any production, converting or changes to the products, did not need to have a chain of custody certificate. Is this still the same with the new standard?

A: No. This option has been deleted. Any supplier of PEFC certified material shall have a PEFC recognized certificate.

DUE DILIGENCE SYSTEM (Appendix 2)

Q: Why not include FSC certified in exemptions for DDS?

A: PEFC Council does not control the requirements of FSC certification. FSC certified material is therefore not excluded from the PEFC Due Diligence System. However, the FSC certification is considered within the risk assessment methodology.

Q: When you say all incoming material must be identified, does that include material for non-PEFC product groups?

A: The PEFC Due Diligence System shall be mandatorily implemented for all product groups where the percentage based method is used. Voluntarily, the organization can implement the PEFC DDS for other product groups.

Q: Do all high risk suppliers need to be visited by CBs?

A: No. The certification body shall evaluate compliance of the implementation of the PEFC Due Diligence System with the requirements of the standard. This does not require visits of all high risk suppliers.

Q: Is the due diligence certificate independent from the Chain of custody certificate?

A: Where a PEFC Due Diligence certificate is issued, it is independent from the PEFC Chain of custody certificate. For organizations with PEFC Chain of custody certificate, the scope of PEFC Due Diligence System should be included in the PEFC Chain of custody certificate.

Q: How shall a DDS certificate be issued (number of certificate, scope, validity...)?

A: The rules for the scoping of the PEFC DDS certificates are the same as those for the PEFC Chain of custody certificates.

Q: How can be demonstrated that the inputs do not come from forests converted to other vegetation type?

A: The organization shall receive evidence from its suppliers that the material does not originate from forest conversions.

Q: If we certify a company's PEFC Due Diligence System, I understand there is no on-product labelling, but is there a PEFC logo being contemplated for off-product use such as invoices/marketing documents?

A: The PEFC Council does not provide a logo for off-product communication relating to PEFC Due Diligence System.

Q: You can get a DDS certificate, but you cannot claim. What's the use of the DDS certificate then?

A: Similar to management system certifications, the organization can communicate the implementation of the PEFC DDS and coverage of certain products by the organization's PEFC DDS.

Q: How does an organization pass on the "due diligence" information to their customers?

A: The organization should communicate that the material is covered by the organization's DDS and refer to the PEFC chain of custody or PEFC DDS certificate. The scope of the certificate should include amongst other information validity of the certificate, standard (reference base), products covered by the PEFC DDS.

Q: Is any specific verification of compliance to national law required for PEFC Due Diligence audits?

A: The audits evaluate an organization's compliance with the requirements of the PEFC DDS. The PEFC DDS is based on the definition of the controversial sources which also covers compliance with applicable national legislation.

Q: Doesn't the Due Diligence Certificate confuse PEFC certification in the eyes of the consumer? The consumer probably does not know the difference.

A: No. The PEFC Council does not allow on-product claims to be made and the primary objective of the PEFC DDS is to provide organizations within the supply chain the methodology for verification of their supplier rather than to communicate this to final consumers.

Q: Could there be a different certificate code for the Due Diligence System, like CB-DDS-##### and just have this number in addition to the chain of custody certificate number on the cert?

A: The PEFC Council does not regulate numbers/codes for Chain of custody certificates. In the same way, the PEFC Council does not intend to regulate the numbers/codes of PEFC DDS certificates.

MULTI-SITE CERTIFICATION (Appendix 3)

Q: There is a requirement for the organization to conduct internal audits. In a multi site organization is it mandatory to audit each site annually or is sampling acceptable?

A: PEFC ST 2002:2010, Appendix 3, Chapter 3.2.1 j requires an on-site annual internal audit of all sites.

Q: Do internal audits for all sites have to be carried out "on-site"?

A: PEFC ST 2002:2010, Appendix 3, Chapter 3.2.1 j requires an on-site annual internal audit of all sites.

Q: Multisite in 1 country is a problem because multinationals are off course not in 1 country

A: The country limitation applies only to “producer groups” (PEFC ST 2002:2010, Appendix 3, chapter 2.6)

Q: To be clear, if a company has sites in both the US and Canada can they have one multisite certificate covering the sites in both countries or do they have to undergo two separate audits, one for each country and two certificates?

A: If the company meets the condition of multisite organization under 2.3a (Appendix 3 to PEFC ST 2002:2010), it can include sites located in more countries.

SOCIAL, HEALTH AND SAFETY REQUIREMENTS (Appendix 4)

Q: Why did PEFC include social, health and safety requirements in its chain of custody standard? Shouldn't the chain of custody be focused on the single issue of “tracing back” certified material to sustainably managed forests?

A: The PEFC Council decided to provide confidence that products claimed or labeled as PEFC certified do not originate from manufacturing or other business activities that violate the fundamental rights of workers' health and safety.

Q: Is specific verification of compliance to national law required for audits of the PEFC chain of custody social criteria?

A: No. The organization is required to meet requirements of Appendix 4 to PEFC ST 2002:2010. However, consideration can be given to evidence relating to the compliance with national legislation where national legislation meets the requirements of the standard.

Q: How can you prove the company complies with the minimum age of employees?

A: Through company's hiring procedures, evidence of workers age, interviews with workers, for example.

Q: What are the requirements for auditors to assess these new social requirements?

A: General requirements of ISO 19011 apply. The auditor shall be competent to verify the compliance with the certification standard.

Q: Regarding Appendix 4: Certification bodies must control the validity of the declaration ... how if they do not have the competence in health and safety topics?

A: A certification body which does not have the competence to evaluate requirements of the standard does not meet the general requirements for certification bodies (ISO Guide 65, ISO 19011). The certification body shall ensure that its personnel have sufficient competence to perform their tasks.

Q: Would the presence of a Health and Safety policy and statement cover the social requirements?

A: No. Health and Safety is only a part of the scope of Appendix 4 requirements.

Q: Are Health & Safety requirements applicable to subcontractors?

A: Yes, for those subcontractors which are covered by the organization's chain of custody. Chapter 6.8.1 of PEFC ST 2002:2010 requires that the organization's chain of custody shall also cover activities of sub-contractors...

Q: Is the Appendix 4 requirements an "either-or" or "and" standard?

A: It is not clear what is meant by "either-or" or "and" standard. Appendix 4 includes in chapters 2.1 and 2.2 (a-e) requirements which all have to be met.

Q: Do you have any sense of the amount of auditing effort a CB would have to expend to verify conformance with Appendix 4 in a North American context, i.e., where there are established laws prohibiting child labour, etc. ? In the extreme, this Appendix has the potential to add a lot of time to a PEFC audit (e.g., if the CB had to do a detailed health and safety audit on a production facility).

A: The auditing time will depend on how well the organization is able to demonstrate its compliance and what evidence it presents to the auditor.

PEFC LOGO USAGE (PEFC ST 2001:2008, v2)

Q: Is "<85% recycled material" (>70% respectively) referring to the whole content of the product or to the certified part (which has to be > 70%) of the product?

A: The content of recycled material refers to the whole product, respectively product group.

Q: If a product contains between 70% and 85% recycled content, is it correct that either the “PEFC Certified” or the “PEFC Recycled” label can be used?

A: Yes. The organization may choose.

Q: Can you label a product with the “PEFC Recycled” label if there is any virgin fibre in this product?

A: Yes. The “virgin content” can be up to 30%

Q: If the product does not contain “recycled” material, the claim of the “PEFC Certified” label has to be used without the word “recycled”. However, if the label contains e.g. 70% recycled and 30% non-controversial material, the reference to sustainably managed forests remains in the claim. Also the reference to controlled sources remains if the product consists of e.g. 100% PEFC certified material. Isn’t that confusing?

A: The text of the claim in the label lists material which is recognized under the specific label.

Q: What about forest owners who have no chain of custody and follow only logo usage rules, according to these rules % is a facultative information.

A: Material sold by forest owners based on forest management certificate is considered as 100 % certified as such meets the labeling requirements.

Q: If a certified organization manufactures products, but the final process in manufacturing the end-product is done by a certified printer, can both logo licences be put on the end product?

A: Labelling shall clearly identify who is the user of the label and who has the responsibility for the label usage and on-product claims. Therefore only one organization can make claims and can use the PEFC Logo for one product.

OTHER

PEFC CERTIFICATION REQUIREMENTS (RELATED TO PEFC COC CERTIFICATION)

Q: Where can we find accreditation requirements for certification bodies regarding things such as sampling of multi-sites and outsourcers, waiving audits of clients who have not labelled or sold and PEFC product, auditor training requirements, etc. ?

A: PEFC Council and the IAF (International Accreditation Forum) are currently in the final stage of approving a new document with requirements for certification bodies operating chain of custody certification.

Q: Can a company obtain a PEFC certificate if it hasn't supplied PEFC certified material at the time of the initial audit?

A: The organization shall demonstrate full compliance with the chain of custody requirements. Some certification bodies require certified material to go through the chain of custody process in order to demonstrate compliance with the chain of custody requirements..

Q: If a certified organization has not sold any PEFC certified products since its last surveillance audit, has the surveillance audit to be carried out on-site? Wouldn't a remote audit / desk audit be sufficient?

A: ISO 19011, to which the PEFC Council refers ([Annex 6 of the PEFC Council Technical Document](#)) requires on-site surveillance audits.

Q: As a certification body do we have to become accredited for certification against the new standard separately, or will certification against PEFC ST 2002 be covered by accreditation for Annex 4 certification.

A: PEFC Council recognises accreditations whose scope covers Annex 4 as PEFC ST 2002:2010 replaces this standard. Accreditation bodies have their own policies on how to amend accreditation scope in case of standard revisions.

NATIONAL CHAIN OF CUSTODY STANDARDS OF PEFC ENDORSED SCHEMES

Q: Will the PEFC member countries adopt the new Chain of custody standard by the end of the transition period?

A: The transition period for PEFC ST 2002:2010 also applies for situations where the national schemes adopted the PEFC international chain of custody standard.

Q: What is the phase in period for nationally endorsed standards to update to the new PEFC Chain of custody standard.

A: Validity of the endorsement of a scheme specific chain of custody standard remains the same as the validity of the endorsement of the whole scheme (currently only applies to AFS – Australia and Certfor Chile).

Q: Is there going to be a process where CBs can submit questions to PEFC for a formal interpretation of the requirements of the PEFC standard. If so, will these interpretations be published?

A: The PEFC Council has recently started a public consultation on a guidance document for PEFC ST 2002:2010 which intends to provide clarifications, interpretations, examples, etc. The PEFC Council also intends to have a regularly updated FAQ document.

MISCELLANEOUS

Q: Is a French version of the PEFC chain of custody standard available?

A: The only official version is English. The Copyright notice of PEFC ST 2002:2010 states that translations can be provided by PEFC Council or PEFC National Governing Bodies (NGBs). Although the PEFC Council does not intend to make translations into other languages, it is expected that PEFC NGBs will translate the document into their national languages. The respective PEFC NGBs should therefore be contacted (see www.pefc.org).

Q: When will the guidance document on the chain of custody standard be published?

A: It is expected that the guidance document could be published in June 2011.