

FCBA REFERENCE FRAMEWORK

FSC® CHAIN OF CONTROL



The mark of
responsible forestry

The current FSC® Brand standards are available on the FSC® website: fsc.org

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1. General organization of the FSC® brand

1.1. Objective of forest certification

1.1.1. Responsible forest management

Forests represent a global environmental and socio-economic heritage. In addition to the production of wood and other forest products, forests are also places of relaxation and leisure. They contribute to the quality of landscapes and are home to flora and fauna. They protect soils and water quality. They contribute to the fight against desertification.

Forests are therefore at the heart of international discussions on sustainable development and management. Sustainable forest management is an approach to environmental, social and economic development that "aims to meet the needs of the present generation without depriving future generations of the opportunity to meet their own needs".

Forest certification systems were established to develop sustainable management criteria and ensure good forest management.

This document is part of the FSC® Chain of Custody certification.

1.1.2. Companies concerned by the Chain of Custody certification

This document applies to companies that carry out or have carried out forestry operations, processing, distribution and/or marketing of forest products and products containing wood and fibres of forest origin, under their responsibility and ownership.

The Chain of Custody concerns each link in the chain, i.e. all the units that enable the transformation of wood from the log, or another forest product, to the finished product. A unit in the Chain of Custody is defined by a transfer of ownership of the forest material.

1.2. FSC® Chain of Custody certification

1.2.1. The Forest Stewardship Council® (FSC®)

The Forest Stewardship Council® (FSC®) is an international non-profit organization established in 1993, made up of different groups representing environmental non-governmental organizations (NGOs), wood professionals and indigenous peoples.

The FSC® International Centre is currently based in Bonn, Germany. It currently consists of four regional offices (Africa based in Kenya, Latin America based in Peru, Asia Pacific based in Hong Kong and Europe based in the United Kingdom).

FSC® has established a service that accredits independent third-party organizations whose role is to assess and certify that a forest is managed in accordance with the FSC® principles and that a forest-based product has been produced from raw materials managed in accordance with the FSC® principles.

The objective of the FSC® mark is to promote and ensure good forestry practices as defined in the "FSC® Principles and Criteria for Good Forest Management" and to establish a uniform marking of FSC® certified wood and forest products.

1.2.2. Types of FSC® certification

The following types of certifications exist:

- Forest Management certification (abbreviated as “FM”): obtaining a certificate attests that the forest management implemented by the beneficiary forest entity meets the regulations in force and the requirements of the FSC®, and does not sell FSC® certified products from these forests.
- Chain of Custody certification (or CoC for short): Chain of Custody is the monitoring of the supply chain of forest products from the forest (or from the recovery of materials in the case of recycled products) to the end consumer. The Chain of Custody certificate attests that the company processing or distributing the forest material ensures the monitoring of certified forest products in accordance with FSC® requirements (see Annex 9).
- Combined Forest Management and Chain of Custody (FM/CoC) certification for companies that carry out forest management operations and sell products from their FSC-certified forests.
- Project certification is defined as the certification of the production (or renovation) of a construction or civil engineering project, an individual art or decoration object or a transport vehicle made from or containing forest-based materials. It can be a “one-off certification” valid for a single project, a “permanent certification” for several projects.
- FSC Controlled Wood in Forest Management (CW/FM for short) certification allows forest managers to have their forest management activities certified for the sale of FSC Controlled Wood.
- The complementary certification to the FSC® Regulatory Module which allows organizations applying for FSC certification or holding FSC certification to voluntarily extend their scope of certification to comply with Regulation (EU) 2023/1115 (RDUE).

1.2.3. Texts applicable to Chain of Custody certification

The application of the FSC® Chain of Custody system is governed by various normative documents articulated as follows:

FSC® Chain of Custody Normative Framework		
Chain of Custody Standard	Additional standards	Other normative documents
FSC-STD-40-004 Chain of Custody Certification	FSC-STD-40-003 Multi-Site Chain of Custody Certification	FSC-PRO-40-003 National Criteria CoC Group
	FSC-STD-40-004a FSC Product Classification	Instructions FSC-DIR-40-004 FSC-DIR-40-005
	FSC-STD-40-005 Sourcing of FSC Controlled Wood	FSC-PRO-60-006b FSC Risk Assessment Framework
	FSC-STD-40-007 Supply of recycled materials	
	FSC-STD-01-004 FSC Regulatory Module	

The FSC® normative documents are: Policies (coded “FSC-POL-XX-XXX”), Standards (coded “FSC-STD-XX-XXX”), Directives (coded “FSC-DIR-XX-XXX”), which contain the ADVICES, and Procedures (coded “FSC-PRO-XX-XXX”) and interpretations (INT type documents).

Companies applying for Chain of Custody certification must comply with the certification process and the requirements of the FSC® and its documents corresponding to their activity(ies).

This document is established in accordance with the current FSC® normative documents available on the FSC® website: fsc.org in the “Document Center” section and which take precedence over this reference document.

In pursuing certification under its FSC® accreditation, FCBA must comply with the requirements of all applicable FSC® normative documents.

Updates shall explicitly include consideration of all new or revised FSC® policies, standards, guidelines and interpretations published on the FSC® website to ensure that FCBA policies and procedures are in continued alignment with all FSC® requirements.

1.3. FCBA, Certification Body for the FSC® Chain of Custody

1.3.1. Presentation of the FCBA Technological Institute

The FCBA (Forest Cellulose Wood-Construction Furniture) Technological Institute is a certification body created in 1952, whose activity is officially declared in the Official Journal of the French Republic, in accordance with the terms of the law of June 3, 1994.

1.3.2. Relationship between FCBA and FSC®

FSC® accredits organizations for Chain of Custody certification.

The standards relating to certification bodies in Chain of Custody are as follows:

- FSC-STD-20-001: General requirements for FSC® accredited certification bodies,
- FSC-STD-20-011: Accreditation Standard for Chain of Custody Evaluations.

Since July 28, 2004, FCBA has been accredited by the FSC® accreditation body ASI (Assurance Services International) as a certification body for the FSC® Chain of Custody.

FCBA is accredited for Chain of Custody certification at international level, with the exception of Belarus, China and the Russian Federation. As such, it acts as a certification body for companies without geographical or linguistic limits.

FCBA is responsible for assessing the conformity of Chains of Custody and awarding Chain of Custody certificates, allowing holding companies to use the FSC® mark on FSC® certified products, on commercial and communication documents.

In accordance with the requirements and under the control of the FSC®, FCBA's role is to monitor the use of the brand by the companies holding the trademark and to ensure the management of conflicts.

FCBA is the direct contact between candidate and holder companies and the FSC®. It regularly transmits information to the FSC® relating to the certificates issued.

The FCBA organizational structure makes available upon request to stakeholders the names and qualifications of the members of the FCBA departments responsible for:

- a) The general execution of the activities of the certification body;
- b) Review of the independence of the certification body;
- c) The formulation of policy questions that affect the operation of the certification body;
- d) Making certification decisions;
- e) Implementation of the certification body's policy;
- f) The resolution of appeals.

1.3.3. Organization and responsibilities of FCBA in FSC® Chain of Custody certification

Levels of responsibility

FCBA's organization for FSC® CoC certification is based on three levels of responsibility:

- Management of the FSC® CoC certification system:
The Brand Manager (REM) is responsible for monitoring FSC® requirements and ensuring the operation of the brand (financial management, complaints monitoring, auditor qualification, etc.). He evaluates each certification application file and carries out technical reviews of the audit files (instruction, monitoring, renewal). He is assisted in these tasks by one or more Brand Managers (GEM).
- Conducting certification audits:
Auditors conduct audits, prepare audit reports and follow up on non-conformities.
Auditors are qualified in accordance with the requirements of the FSC® and the internal provisions of FCBA. Any auditors working as subcontractors on behalf of FCBA are qualified under the same conditions as FCBA staff.
- Certification decision:
Certification, suspension and withdrawal decisions are made by the FCBA FSC® certification decision-making entity, consisting of the FCBA Certification Director and a Technical Decision-Maker.

Confidentiality

The participants in the certification process, FCBA employees and subcontractors, are contractually bound to respect confidentiality.

They take every precaution to avoid any direct or indirect disclosure, as a result of their actions, of information or documents to which they may have access or of which they may have had knowledge. This particularly concerns information contained in the files of companies applying for or holding certification.

Impartiality

The independence and impartiality of FCBA are ensured in accordance with the requirements of the NF EN ISO/CEI 17065 standard and the FSC® standards and normative documents.

The Certification Committee's mission is to formulate FCBA's principles of action in matters of certification and to ensure the execution of certification as defined. It meets, in its object, the requirement of the NF EN ISO/CEI 17065 standard relating to the "participation of all parties significantly concerned by the development of policies and principles relating to the content and operation of the Certification system".

This Committee has a balanced structure, composed of three colleges bringing together representatives of the holders, customers/prescribers and technical bodies/Administrations. The list of members making up the Certification Committee is available to any interested party who requests it.

Activities incompatible with FSC® Chain of Custody certification activity:

- Consulting activities:
The performance of consultancy activities within the scope of FSC® accreditation by FCBA and any other affiliated company (by legal entity and/or service under control) is not permitted for companies under contract with FCBA for FSC® Chain of Custody certification.

- Training activities:

The performance of personalized training activities within the scope of FSC® accreditation by FCBA and any other affiliated company (by legal entity and/or service under control) is not authorized for companies under contract with FCBA for FSC® Chain of Custody certification (e.g.: in-company training, not freely accessible).

FSC® Chain of Custody certification activity is permitted only if the following conditions are met:

- No consultancy activity within the scope of FSC® accreditation has been carried out by FCBA or any other affiliated company (by legal entity and/or service under control);
- FCBA staff, if they have previously been required to carry out a consultancy activity within the scope of FSC® accreditation in a company, or be employed by a company, must allow a minimum period of 3 years before being potentially involved in the FSC® certification process (audit, review of an audit file, certification decision, review or approval of a complaint or appeal) of the same company;
- The training activity within the scope of FSC® accreditation carried out by FCBA or any other affiliated company (by legal entity and/or service under control) complies with the following conditions:
 - where training relates to FSC® requirements, it may only cover generic information that is freely available in the public domain;
 - the training does not provide company-specific solutions and is not carried out in-house;
 - the models presented:
 - are publicly accessible;
 - do not provide business-specific solutions;
 - include a disclaimer, stating that the model is not a guarantee of compliance with FSC® requirements. It is the company's responsibility to comply with FSC® requirements;
 - use is voluntary.

NOTE: Templates may include sample procedures, which may be established for specific industry sectors or customer types, as long as they contain only generic information and fictitious examples. The development of company-specific procedures and manuals is not permitted.

2. FSC® Chain of Custody Certification Process

2.1. Processing an application

2.1.1. Prerequisites for applying for certification

FCBA ensures the provision of this reference document and the applicable standards to companies wishing to implement the FSC® Chain of Custody (see [Annex 1](#)) on its website: <https://www.fcba.fr/certifications/gestion-forestiere-responsable-fsc/>.

The FSC® Chain of Custody certification application file to be sent to FCBA when applying is detailed below.

Before submitting a certification application file, the company ensures that it meets all the conditions defined in this standard (see chapters [6](#) And [7](#)). It undertakes to comply with these conditions for the entire duration of the Chain of Custody certificate.

2.1.2. Certification application file

The FSC® Chain of Custody certification application file comes from a company that does not have Chain of Custody certification. It must be sent to FCBA and must contain the following elements:

Application for FSC® Chain of Custody certification on company letterhead (see Annex 2)
Completed application form (see Annex 3 and Annex 4)
Certification proposal signed by the company (see paragraph 3.1)

Chain of custody procedure ¹
Self-assessment and policy statement for core work requirements (FSC-STD-40-004 §7)

NOTE: the certification request can be made via the website (see §2.1.1.)

Special case of FSC Controlled Wood certification: the following documents must be provided in addition:

Document “FSC Controlled Wood Due Diligence System Public Summary” duly completed (DOC 4355 on demand)
Due Diligence System: procedures and associated documents (e.g. proof of stakeholder consultation)
Procedure for handling comments and complaints from stakeholders related to the SDR
Internal audit of the SDR system
SDR Changes Summaries

Case of complementary certification to the FSC® Regulatory Module: the following documents must be provided in addition:

Document “FSC® RDUE - Summary of the Due Diligence System” duly completed (DOC 4359 on demand)
Due Diligence System: procedures and associated documents
Procedure for handling comments and complaints from stakeholders related to the SDR
Internal audit of the SDR system
SDR Changes Summaries

2.1.3. Review of the application

Upon receipt of the FSC® Chain of Custody certification application file, FCBA conducts an admissibility study to verify that all requested documents are attached and completed by the applicant company and that the elements contained in the file comply with FSC® requirements. FCBA may be required to request additional information.

When the file is complete, FCBA prepares the instruction procedures (initial audit, preceded if necessary by a prior audit) and informs the candidate company of the procedures for carrying out the audit (auditor, date, duration, sites audited, etc.).

Before the initial audit date, the requesting body is registered on the FSC database in order to trigger the validation of the license agreement (TLA) via electronic signature on the database.

2.1.4. Transfers of certificates between certification bodies

Any transfer of certificates is carried out in accordance with the requirements of the procedure FSC-PRO-20-003: “Transfer of FSC® certificates and license agreements”.

¹The company must send FCBA an FSC® procedure (or equivalent document) describing the system set up for the certification of its FSC® Chain of Custody, taking into account all the requirements of this standard. Without receipt of this procedure, the initial audit cannot be carried out.

2.2. The audit

2.2.1. The different types of audits

Pre-audit (optional)

An assessment may be carried out before the initial audit in order to decide on the company's compliance with FSC requirements. A report is provided to the company containing the observations noted during this assessment.

Preliminary audit

An initial audit phase must be carried out each year at the central office for multi-site certification or at the group entity for group certification (see FSC-STD-40-003).

Initial audit

The objective is to ensure that the provisions defined by the candidate company meet the requirements of the applicable FSC® standards and in accordance with this standard (see §7).

Surveillance evaluations

As with the initial audit, the audit is carried out on the basis of the FSC® requirements. The auditor also ensures that the company holding the certification has implemented the defined provisions, that non-conformities from the previous audit have been addressed and that the rules for using the FSC® Mark have been applied (see § 6).

For sites that have not produced, labelled or sold any FSC® certified material and have not sourced controlled material or sold FSC® Controlled Wood since the previous audit, the Surveillance evaluations may be waived.

NOTE: When FSC activity resumes at the holder, the latter must inform FCBA as soon as possible and a Surveillance evaluations must be carried out within 3 months.

When new or revised FSC® standards come into force and the following requirements are met:

- a) FCBA carries out an assessment of the organization's procedures against the new normative requirements relevant at the scheduled date of the Surveillance evaluations.
- b) The assessment must be carried out on site if:
 - i. The organization's chain of custody system requires adjustments due to new requirements which, if not addressed, may lead to major nonconformities;
 - ii. The organization will use a new system to control FSC claims under a specific product group (FSC-STD-40-004);
 - iii. FCBA considers this necessary to assess the implementation of corrective action requests or a change in the scope of the certificate.
- c) If the suspension of an organization's chain of custody certificate exceeds the time frame for their regular Surveillance evaluations at the time a new or revised FSC® standard becomes effective, FCBA must conduct an assessment of the organization's procedures to ensure that they comply with the requirements of the new standard when the suspension is lifted.

So, for sites that have not produced, labelled or sold any FSC® certified material and have not sourced controlled material or sold FSC® Controlled Wood since the previous audit, it is possible to waive the Surveillance evaluations.

NOTE: The decision to waive a Surveillance evaluations for the reasons described above is at the discretion of FCBA. FCBA may require that a Surveillance evaluations be conducted if it is considered necessary to ensure confidence in the certificate.

In the event of a complaint, formal denunciation by a third party or doubt about the certification of a marketed product, FCBA reserves the right to conduct unannounced or short-notice Surveillance evaluations at the offices and production sites of the holder company. The duration of an unannounced or short-notice audit cannot be less than half a day.

Renewal audit

Certification is renewed five years after the initial audit. The renewal audit is comparable to the initial audit.

Extension audit

An extension audit may be necessary as part of a request to modify the scope of the Chain of Custody. It is organized in the same way as the initial audit.

Additional audit

An additional audit may be required of a company as part of an increase in control (change of scope, audit of subcontractors, etc.). It is carried out in the same way as a surveillance evaluation. The scenarios and the steps to be taken are presented below (see §2.2.2).

An additional audit may also be triggered in order to continue the audit or to allow the non-conformities to be resolved in accordance with what is defined in our commercial offer.

2.2.2. Development of an audit

The audit is divided into three stages:

- Preparation of the on-site visit;
- The on-site visit;
- Drafting the audit report.

Programming

FCBA appoints an auditor, and where applicable a technical expert qualified to carry out FSC® audits (FCBA personnel or subcontractor), responsible for carrying out the audit taking into account the scope of application declared by the candidate/holder company.

The auditor and the company set the audit date for the site to be certified. The audit programme is sent to the company at least one week before the scheduled date. The self-assessment of the FSC® core labour requirements and the procedure must be sent to the auditor before the audit.²The auditor evaluates the self-assessment as part of the preparation for the on-site audit.

Conducting the on-site audit

The candidate or holder company facilitates the auditor's mission by providing him with competent persons and giving him access to premises, equipment, installations, documentation and commercial documents of all kinds.

² Preferably at least 5 days before the audit to allow for analysis.

When reviewing documentation and records, the FCBA auditor will review at a minimum:

- a) Any change in the scope of the FSC® certificate, including new Chain of Custody operations, new participating sites and/or changes in activities;
- b) Changes to the certificate holder's management system;
- c) Inventory records;
- d) Purchase and sales documentation for FSC® and FSC® Controlled Wood certified products (invoices, shipping documents (BL), sales contracts);
- e) Confirmations that inputs described as FSC® certified or FSC® Controlled Wood are covered by a valid FSC® Chain of Custody and provided with applicable certification numbers;
- f) For the production of:
 - i. "FSC Mixed" and "FSC Recycled" products: calculations of credits and/or entry percentages for each product group within the limits of the certificate;
 - ii. "FSC 100%" products: a sample of certified production records and confirmation that these can be traced back to certified inputs;
 - iii. "FSC Controlled Wood" products: program for assessing controlled material qualified as FSC Controlled Wood by the company.
 - iv. Regulatory Products (REG): a sample record of production with FSC claim and confirmation that these can be traced back to inputs that comply with the FSC Regulatory module.
 - v. Regulatory+ Products (REG+): a sample record of certified production and confirmation that these can be traced back to 100% FSC certified inputs and that each certificate holder in the verified supply chain has applied the <FSC-STD-01-004 FSC Regulatory Module.
- g) Uses of FSC® Marks (on-product and promotional);
- h) Training recordings;
- i) Complaints received;
- j) Interviews with a sufficient number and variety of employees, their representatives, including workers' organizations, employer representatives and subcontractors, at each operational site selected for assessment, to verify the company's compliance with all applicable certification requirements. The auditor ensures that comments can be provided in confidence;
- k) At a minimum, interviews are conducted to verify training measures and understanding of individual responsibilities at different sites of the operation being evaluated.
- l) The supported declaration of the overall turnover and wood. Proof of these turnovers will be collected.

Additionally, for group and multi-site certificates, the FCBA auditor reviews and assesses:

- a) The list of participating sites;
- b) The rate of change of participating sites (new sites, sites having left the certificate);
- c) The ability of the certificate holder's management system to handle any changes in the scope of the certificate, including increases in the size, number or complexity of operational sites within the certificate boundaries;
- d) Formal communication/written documents sent to participants by the certificate holder since the previous FCBA monitoring;
- e) Records of internal audits carried out by the certificate holder;
- f) Records of all corrective actions carried out by the certificate holder;
- g) Records of the annual management review carried out by the certificate holder.

In the case of project certificates, the FCBA auditor will further verify that only eligible materials have been used in the projects (or their components) and that the FSC claims made about them are true and correct.

At the closing meeting, the auditor presents his conclusions to the company and formulates any discrepancies noted during the audit.

Duration

The duration of an initial audit may not be less than one day for a site, except in the case of group/multi-site certification where the duration for a group/site member may be reduced to half a day. The duration of a Surveillance evaluations for a site may not be less than half a day.

Depending on the complexity of the Chain of Custody to be audited (number of applicable standards, method chosen, number of activities within the scope of the certification, system for controlling the use of the FSC® brand chosen, etc.), FCBA may consider a longer duration without exceeding two days for a simple site.

In the case of a group/multi-site certification, the total audit duration may exceed two days. It corresponds to the sum of the audit duration defined for the group entity/central office and the audit durations defined for each group/site member included in the sampling.

The company is informed of the audit duration selected through the quote and the audit programs sent to it.

Frequency

The frequency of Surveillance evaluations is at least one audit per calendar year. FCBA will ensure that the interval between two audits does not exceed 15 months.

Depending on the case, for example, the quantity of production, the complexity of the Chain of Control, the experience and performance of the personnel, the nature of the non-conformities and complaints, FCBA reserves the right to increase the frequency of surveillance evaluations.

2.3. Certification decision

2.3.1. Operations carried out following the on-site audit

The audit report is sent to the company within one month from the date of the audit.

It is accompanied, where applicable, by deviation sheets and a request for corrective actions to be taken within a set time frame.

The company must sign the audit report (Audit Summary) and complete the deviation sheets with the planned corrective actions and the deadline for implementation.

2.3.2. Treatment of non-conformities

The wording of the non-conformities specifies the nature of the deviation, the requirement and the area (site, activity, etc.) concerned. Non-conformities are classified into two levels, depending on their severity:

Minor Nonconformity (ENC) or Remark (R)

Deviation in documentation and/or practices that do not call into question the response to a requirement of this standard. The maximum period for removing this type of deviation is one year (or two years in exceptional circumstances, with the approval of FCBA), date to date, or during the next audit, whichever comes first. Beyond the period defined with FCBA, the remark automatically becomes a non-conformity. The Chain of Custody certificate can be issued (in the initial audit) and maintained (in the Surveillance evaluations).

Major Nonconformity (NC or EC)

Deviation in documentation and/or practices calling into question the consideration of a requirement of this standard. The period granted for the lifting of a non-conformity cannot exceed 3 months (within 6 months in exceptional circumstances, with the approval of FCBA). If after 2 months the non-conformity has not been lifted, a final reminder may be sent to the company before the triggering of a sanction procedure from the target

date of the non-conformity. The Chain of Custody cannot be certified (in initial audit) or maintained (in Surveillance evaluations) until the company has lifted the non-conformities within the time limit.

In the initial audit, if after 6 months the non-conformities have not been lifted, the audit is considered null and void. In this case, a new instruction is initiated and a new initial audit is carried out.

Consequence of the non-conformities

- Any discrepancies must be resolved within the time limits agreed with the auditor, otherwise a sanction procedure will be initiated.
- A significant number of non-conformities may lead FCBA to request a close audit in order to enable the non-conformities to be resolved before the certificate is awarded.
- During a surveillance evaluation, if the number of non-conformities is greater than or equal to 5, the certificate will be suspended immediately.

2.3.3. Obtaining the Chain of Custody certificate

The certification decision is taken by the FCBA FSC® certification decision-making body consisting of the FCBA Certification Director and a Technical Decision-maker, based on the audit report and the corrective actions carried out. The decision is notified in writing to the applicant or holder company.

When the certification decision is positive, a certificate with a Chain of Custody number is issued. It specifies the scope, the scope of application, the methods and the validity period of the certification (5 years). The Chain of Custody number assigned is in the form "FCBA-COC-XXXXXX" ("COC" for Chain of Custody).

Group / multi-site cases:

The certificate specifies the business name of all members of the certified group / multi-site and the corresponding Chain of Custody sub-number. Duplicates of the group / multi-site certificate may be issued by FCBA to each member of the group / multi-site. Each sub-group (defined according to the common activity of several sites within a multi-site or group) will be assigned a certificate sub-number, represented by an additional letter to the certificate number.

Example: activity 1 of group / multi-sites FCBA-COC-XXXXXX-A, activity 2 of group / multi-sites FCBA-COC-XXXXXX-B

Case of FSC® Controlled Wood:

An FSC® Chain of Custody certificate with FSC® Controlled Wood within its scope issued by FCBA will additionally include the FSC® Controlled Wood certification number issued in the form: FCBA-CW-XXXXXX, where XXXXXX is a unique six-digit number published by FCBA, which will be the same as that transmitted for the FSC® Chain of Custody certificate.

The FSC® Controlled Wood certification number cannot be issued (in initial audit) or maintained (in Surveillance evaluations) until the company has resolved all non-conformities, if any.

Obtaining the FSC® Chain of Custody certificate gives the right to use the FSC® Marks.

Special case:

A Chain of Custody certificate may be issued before the company has taken physical possession of FSC® certified material if the operational Chain of Custody system in place is deemed satisfactory.

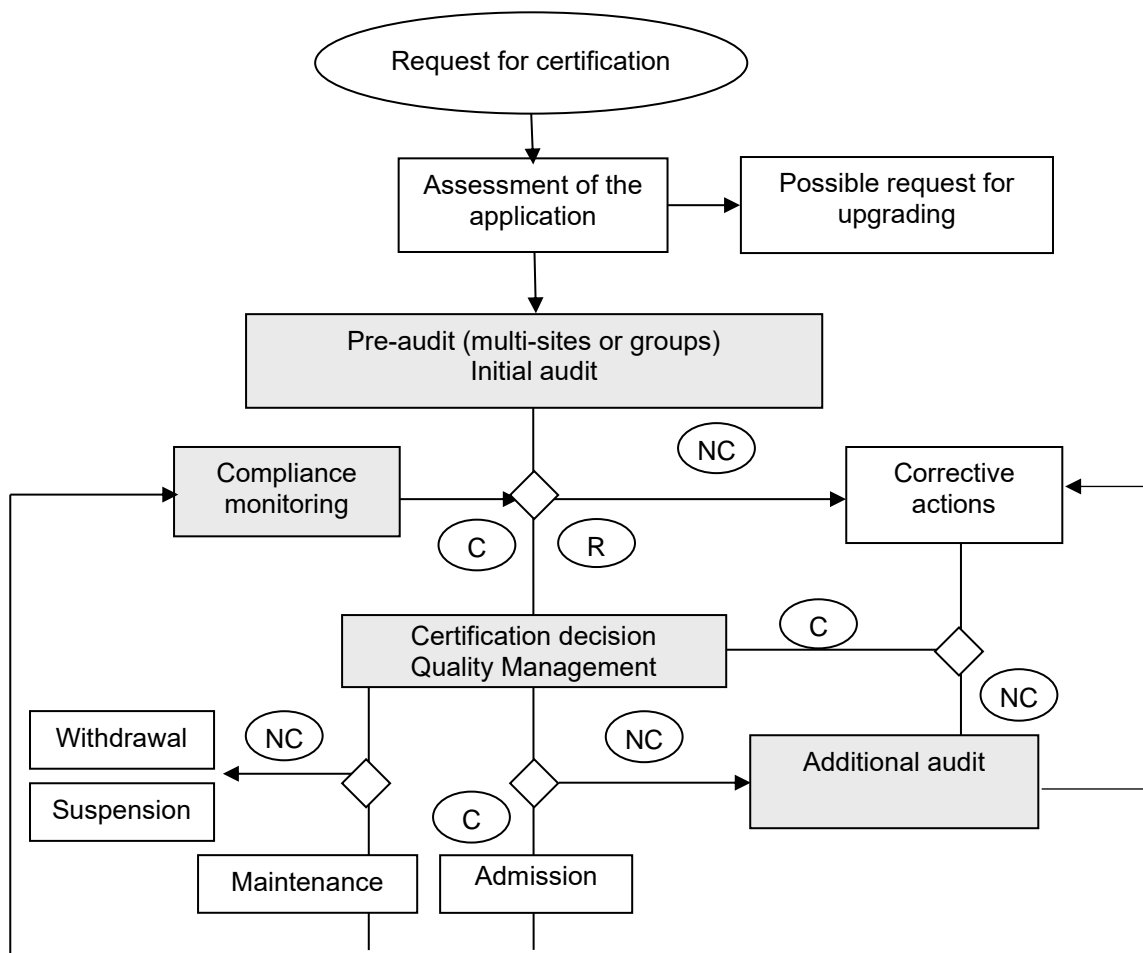
In such cases, FCBA will require the company to notify as soon as FSC® certified stock is available or production of FSC® certified material has started.

FCBA will conduct a (second) site visit or conduct the first Surveillance evaluations within 3 months of receipt of such notice, unless the initial audit resulted in non-conformities related to the management of critical control points.

2.4. Compliance monitoring

2.4.1. Surveillance evaluations schedule

A surveillance evaluation is carried out every year, on the anniversary of the award of the certificate plus or minus 3 months. The certificate is renewed after 5 years.



2.4.2. Maintenance of conformity

Is monitored from:

- Audit results,
- Information from the market (see §5).

Following each audit, the operations described in §2.3.1 and §2.3.2 are carried out.

When the company is in compliance, the maintenance of the certificate is confirmed by mail to the holding company by the person responsible for the FSC® brand.

2.4.3. Modification of the scope of application of the holding company certificate

FCBA requires that the holder company formally inform it of any planned modifications to the product, the manufacturing process or, where applicable, the quality system, which may affect the conformity of the product.

To do this, the holding company that wishes to modify the scope of application of its FSC® certified Chain of Custody must initiate this request as soon as possible by sending the following documents to FCBA:

Request for modification of the Chain of Custody on company letterhead (see Annex 5)
Completed modification request form (see Annex 6)

FCBA determines whether the announced changes require further examination (additional audit). If so, the holder company is not authorized to distribute products deemed certified following these changes until FCBA has notified it of its agreement to this effect.

Following the examination of the application and any additional audit, FCBA notifies the holding company of its agreement or refusal to issue or maintain the FSC® Chain of Custody certificate.

Examples of Chain of Custody changes:

Type of modification	FCBA Actions
Site deletion or group member removal	Notification of the withdrawal decision for the site concerned. Issuing a new certificate.
Adding a production site or group member	Instruction of the request for modification of the file. Extension audit within three months. If the audit is satisfactory, a new certificate is issued.
Change in Chain of Custody certification method or procedures	Instruction of the request for modification of the file. Site audit within three months using the new method or procedures. If the audit is satisfactory, a new certificate is issued.
Change of company name, trade name	Notification of the decision to withdraw under the old trade name. Issuance of a certificate under the new trade name.
Change of legal status	Instruction of the new application and assessment of the need to carry out an audit and/or specific checks. Notification of the decision to withdraw the certificate under the old status. Notification of the decision of admission under the new status if the checks are satisfactory.
Voluntary withdrawal of the holder	Notification of acknowledgment of receipt and acceptance of the withdrawal decision for the site concerned. Request for return of the certificate.

FCBA informs the FSC® of the changes indicated above within thirty days.

For any extension of the scope of the Chain of Custody, the holding company undertakes not to use the FSC® certificate for the Chain of Custody or the FSC® mark on new sites or members until FCBA has notified it of the maintenance or extension of the Chain of Custody certificate.

Changing the scope of the Chain of Custody does not extend the expiration date beyond the validity period assigned in the original application.

The original of the previous certificate must be returned to FCBA or destroyed and any electronic and paper copies held must be destroyed.

2.4.4. Changes to standards and/or the reference document

FCBA transmits to the holder companies and candidate companies’ information concerning the evolution of the FSC® standards applicable to the Chain of Custody.

This standard may be modified, following changes in the internal provisions of FCBA, or to integrate modifications to the FSC® standards.

In all cases, FCBA specifies the consequences of these changes and the time period granted for compliance by the companies holding the licence. If the company holding the licence does not comply with the new provisions within the set time period, a sanction procedure may be initiated.

Holders will be informed within 30 days of any changes to these elements.

2.4.5. Sanctions and provisions in the event of suspension or withdrawal

A sanction may be imposed in the following cases (non-exhaustive list):

- Major non-conformity noted during a surveillance evaluation or unannounced inspection;
- Minor non-conformity not resolved within the set time limits;
- Following a complaint or appeal,
- Non-payment of benefits or AAF contribution;
- Upon receipt of a report, verbal or written, from a third party.

In all cases, FCBA ensures the veracity of the information collected and produces a report mentioning the importance of the non-conformity, its persistence and the corrective actions taken by the company.

Following this report, FCBA makes a decision on the sanction to be issued. The sanction takes effect upon receipt of the notification by the company. The gradation is as follows:

Sanctions	Definitions	Consequences
Warning with or without increased control	This sanction highlights a potential risk capable of calling into question the credibility of the certification system set up by the company. The increase in control is decided in the case where FCBA must verify the implementation of corrective actions. Ex: Involuntary action of a manager or a member of staff of the certified company or of a third party in connection with the certified company	Maintenance of certification subject to implementation of corrective actions.
Suspension	Questioning the system because it is no longer capable of ensuring compliance with the requirements of the standard. Ex: Deliberate action by a manager of the certified company	Temporary suspension of certification.
Withdrawal	Definitive questioning of the system. Ex: Serious and indisputable action relating to the requirements of the reference document or the conditions of use of the logo	Permanent withdrawal of certification.

Note: An observation is not a sanction. It does not call into question the certification system set up by the company.

Note: A suspension decision is notified for a fixed period, which must not exceed 12 months. FCBA may reinstate certification after a suspension if all non-conformities have been removed. If certification is reinstated after a suspension or if the scope of certification is reduced to allow for reinstatement of certification, FCBA must make all necessary changes to official certification documents, public information and authorizations for the use of the FSC® mark. At the end of the suspension period, if certification cannot be reinstated, it is withdrawn.

When a withdrawal or suspension has been decided and notified:

- Any use of the FSC® Marks and any declaration of conformity with the requirements of FSC® certification must be discontinued;
- Any product labelled or marked with the FSC® Marks must be withdrawn from sale or demarked;
- All existing customers (certified and non-certified) must be identified and notified of the suspension or withdrawal in writing within three days of receipt of the notification of suspension or withdrawal and records must be kept.

In the event of withdrawal, the following additional obligations must be met:

- The original certificate must be returned to FCBA or destroyed and any electronic and paper copies held must be destroyed;
- All uses of the FSC® name, initials, logo or trademark on products, documents, or advertising or promotional materials must be removed, at the company's expense;
- The company is removed from the list of certified holders.

FCBA updates the certificate status and the effective date and reason for the suspension or withdrawal in the FSC® database within three days of receipt of the notification of suspension or withdrawal by the company.

FCBA and FSC® reserve the right to verify that the above obligations have been taken into account by the company. Otherwise, legal action may be taken.

2.5. Communication of information relating to certified companies

2.5.1. Information transmitted to FSC® and/or ASI

FCBA regularly transmits to FSC® information relating to certificates awarded, suspended, withdrawn or modified (contact details and certified products). This information is reported in the FSC® database and disseminated via the database: <https://connect.fsc.org/fsc-public-certificate-search>

Audit reports can be forwarded to FSC® or ASI upon request.

Maintaining Supply Chain Integrity:

As part of ASI's transaction verification/fiber testing activities, FCBA collects from companies, analyzes and shares with ASI, upon request, samples of FSC® transactional data/material and product samples and specimens and species composition information.

Additionally, in order to support the monitoring and control of false claims in the FSC® system, FCBA records the following information in the FSC® database (as non-public information):

- Organizations that have not reported any FSC® sales since the previous audit;
- Non-conformities, suspensions, terminations and removal of participating sites due to false claims and/or fraud made by organizations;
- Recommendation of which organizations should be investigated by ASI and the rationale (e.g., evidence that suggests records are being withheld from FCBA, complaints received about the organization, potential volume disparities between the organization and its business partners).

2.5.2. Information made available to the public

FCBA maintains the list of companies certified by it and makes it available to the public on its website: <https://www.fcba.fr/>, via a link to the FSC® website.

3. Administrative and legal aspects

3.1. Contracts

Upon receipt of an application for FSC® Chain of Custody certification (application form and formal request letter), a certification proposal is prepared in two copies based on the information provided by the company. It specifies the rates applied, FCBA's general terms and conditions of sale and the specific conditions for FSC® Chain of Custody certification including the use of the respective FSC® and FCBA trademarks.

The certification proposal signed by FCBA (two copies) is sent to the company. These documents must be returned signed to FCBA before the completion of the instruction phase, or renewal, of the FSC® Chain of Custody.

The license agreement is transmitted electronically to the licensees before the instruction audits and the renewal audits.

Once the certification proposal has been signed and returned to FCBA, it constitutes the contract binding the company and FCBA. At this precise moment in the certification process, the company then becomes a “Client” of FCBA. The signature of the license contract for the FSC® certification scheme (Trademark License Agreement, abbreviated TLA), is verified by FCBA on the salesforce database.

4. Financial Regime

4.1. Annual administration fees

The Annual Administration Fee (AAF, FSC-POL-20-005) for FSC® Chain of Custody companies is invoiced at the end of each quarter. It is expressed in US dollars and billed in euros at the rate in effect at the time of invoicing.

These fees are based on the turnover of forest products³ from the last known accounting year, and collected during the annual audit preceding invoicing.

The information that FCBA will have to integrate into the FSC certification database includes, but is not limited to:

- The type of FSC certificate;
- For Single and Multi-Site CoC Certificate Holders:
 - the start and end date of the fiscal year;
 - turnover of forest products;
 - overall turnover⁴;
- For group CoC certificate holders, the number of group members, the applicable forest product turnover (i.e. for the group as a whole; or for groups with processors and traders, the overall forest product turnover for processors and traders respectively) and the overall turnover.
- For one-time and ongoing project certifications, the overall cost of each project.

The methods for calculating annual fees and AAF classes are defined in Policy FSC-POL-20-005 (current version) available for download on the site: fsc.org in the “Document Center” section.

For group or multi-site certifications, the annual contribution is based on the sum of the annual forest products turnover of all sites in the group or multi-site.

In the case of certification during the year, the amount of the annual contribution is calculated in proportion to the number of quarters engaged in which the company's Chain of Control is certified.

³Forest products turnover refers to the turnover of all certified and non-certified forest products and products containing wood or fibre components (i.e. all wood products, pulp products and non-wood forest products according to FSC-STD-40-004a). It does not refer to 100% of the non-forest products that companies may produce. For clarity, forest products turnover does not refer to related services.

⁴Total turnover is the total revenue of an organization from the provision of goods and services, less trade discounts, VAT and any other taxes based on this total turnover. It also includes intra-company sales (i.e. after any consolidation where a financial group exists). Total turnover refers to the most recently completed fiscal year and is the total total turnover, which is the exact number to the nearest dollar. The conversion rate when entering data into the FSC certification database is the respective rate on the CH fiscal year end date according to the mid-market rate on OANDA.

4.2. Remuneration for FCBA services

The costs of the FCBA certification process break down as follows:

- Costs of instruction fees: the candidate company is liable for these at the time of the initial audit;
- Audit costs (preliminary audit, initial audit, Surveillance evaluations, possibly additional audit), also including the time for preparation, processing and writing of the report;
- Costs related to controls on the use of FSC® trademarks;
- Travel expenses.

4.3. Management of unpaid debts

In the event of non-payment, the procedure is as follows: a deferred suspension notification letter (NSDD) is sent to the customer, the suspension decision is taken 1 month after the date of sending this letter for a maximum period of 3 months with updating of the FSC® database accordingly.

If the amounts due are not paid, the certificate will be withdrawn after the suspension period of 3 months from the date of the suspension decision and the FSC® database will be updated accordingly.

If the customer pays the amounts due before the end of the 1 month period from the sending of the NSDD letter, the suspension does not take place.

5. Appeals and Complaints

The management of complaints, including from stakeholders (which includes the implementation of appropriate measures and their documentation) is a requirement for certification bodies in accordance with the accreditation standard FSC-STD-20-001.

FCBA provides information relating to appeals and complaints upon simple request to the contact specified on the site: <https://www.fcba.fr/qui-sommes-nous/nos-accréditations/> .

A procedure for handling appeals and complaints has been developed and made available on the FCBA website ([Responsible forest management \(FSC®\) - FCBA Technological Institute](#)).

In the event that the complainant and the FCBA do not reach a resolution of the appeals, the complainant has the option to lodge a complaint with the ASI and, as a last resort, with the FSC®, which alone will be competent to resolve the appeals.

6. Rules for using FSC® trademarks

6.1. Rules for using FSC® trademarks

All regulatory documents concerning the use of FSC® marks are available on the FSC® website ([fsc.org](https://www.fsc.org) in the “Document Center” section).

The initials “FSC®”, the words “Forest Stewardship Council®” and the FSC® logos are internationally registered trademarks and their use is controlled by legally binding contracts. The FSC® logo is intended for use on FSC® certified forest and wood products, as well as on marketing documents, labels and declarations accompanying them.

The FSC® mark must be affixed to the product or outside the product exclusively in accordance with the graphic charter and the rules of use of the mark defined in the FSC-STD-40-004 and FSC-STD-50-001 standards in force.

The FSC® mark must always be accompanied by the license number of the company holding it (FSC® CXXXXXX).

6.2. FSC® Brand Pack

The FSC® Brand Pack is available on the website <https://trademarkportal.fsc.org/>. This site is accessible to the owner company at the time FCBA registers it on the FSC® database. The company receives an automatic email for registration on the site as well as for the FSC® logo generator, which allows downloading in high resolution the FSC® logos in white, black or "FSC® green".

A Trademark License Agreement (TLA) between the certificate holder company and FSC Global Development GmbH, signed by the certificate holder company, constitutes the commitment to comply with the conditions of use of this Brand Pack.

6.3. Right to use the FSC® trademark

The right to use the FSC® logo is granted to companies that have received FSC® Chain of Custody certification, by signing the FSC® Certification Scheme License Agreement. The FSC® Logo Generator adds the license number of the licensee company automatically.

The right of use is limited in time to the period of validity of the certification. It is automatically withdrawn in the event of suspension or withdrawal of the Chain of Custody certificate.

6.4. Control of the use of the FSC® mark

Before each new use of the FSC® mark, the company must ensure that the use of the mark is controlled, using an internal process of validation of the use of the mark approved by FCBA or by receiving external approval from FCBA.

6.4.1. FSC® brand usage management system (self-validation)

The holder company may implement a management system for the use of the FSC® mark with an internal control system. This system must comply with all the requirements of the FSC-STD-50-001 standard and be approved by FCBA before the company can start using it.

To do this, the company must initiate a request for approval of its FSC® brand usage management system by sending the following document to FCBA:

Application for approval of the FSC® Trademark Usage Management System (self-validation) on company letterhead (see [Annex 7](#))

Eligibility criteria for the FSC® Trademark Management System:

To be eligible for the FSC® Trademark Usage Management System, the candidate company must not have had any non-conformities (Major or minor) in the use of the FSC® trademark during its last audit.

At the time of its request, the company declares the number of over-product and/or promotional uses made over the last 12 months.

Note: No authorization to use the FSC® trademark management system (self-validation) will be granted to companies before the completion of Surveillance evaluations no. 1 of the first certification cycle.

In a second step, FCBA asks the company to submit a certain number of consecutive correct approval requests for each type of intended use (on-product and/or promotional), based on the company's declaration of the number of on-product and/or promotional uses made over the last 12 months.

The table below defines the rules for calculating the number of applications for approval for uses of the FSC® mark to be submitted to FCBA:

Number of uses of the FSC® mark made over the last 12 months (N)		Number of applications for approval of uses of the FSC® mark to be submitted to FCBA
Over-product uses	$1 \leq N < 5$	N requests for approval
	$5 \leq N < 25$	5 requests for approval
	$N \geq 25$	\sqrt{N} approval requests, rounded up
Promotional uses	$1 \leq N < 5$	N requests for approval
	$5 \leq N < 25$	5 requests for approval
	$N \geq 25$	\sqrt{N} approval requests, rounded up

Following the examination of the application, FCBA determines whether the company is suitable for using the internal control system. If applicable, FCBA notifies the company of its approval of the FSC® Mark Use Management System.

The company is not authorized to use the FSC® Trademark Usage Management System until FCBA has notified it of its agreement to do so.

The controllers designated by the company for the internal validation of the use of the FSC® mark must have been trained in the use of the FSC® mark. It is recommended to follow the Training in the use of the FSC® mark for certificate holders, available online on the website <https://etraining.fsc.org/>

Monitoring of the FSC® Trademark Usage Management System:

During the audits, the auditor will evaluate a sample of validations of FSC® brand uses for each type of use (on-product and/or promotional). The sampling rules are defined in the table below:

Number of validations of FSC® brand usage made since the last audit (N)		Number of validations of FSC® brand uses to be sampled during the audit
Over-product uses	$1 \leq N < 5$	N validations
	$5 \leq N < 25$	5 validations
	$N \geq 25$	\sqrt{N} validations, rounded up
Promotional uses	$1 \leq N < 5$	N validations
	$5 \leq N < 25$	5 validations
	$N \geq 25$	\sqrt{N} validations, rounded up

In each sample (over-product and/or promotional), the auditor verifies that at least 70% of the uses of the FSC® brand validated by the company's internal control system comply with the requirements of the FSC-STD-50-001 standard for maintaining the internal control system of the FSC® brand.

Otherwise, the auditor establishes a non-Conformity to the company on its FSC® brand management system. This non-Conformity may lead to a temporary withdrawal of the authorization to use its FSC® brand management system until the company meets the eligibility criteria again.

In all cases, each non-compliant use of the FSC® mark noted will be the subject of one or more non-conformities depending on the cases encountered.

Additional audit time is required for the FSC® Mark Management System auditor to assess the use of the FSC® Mark. This is a minimum of 2 hours for one site and may extend to half a day in the case of group/multi-site certification.

Note: FCBA may reassess the relevance of the eligibility and maintenance criteria for the FSC® Brand Usage Management System defined in this document, based on the findings made during the audits.

6.5. Control by FCBA

When a company holding the FSC® trademark does not have a system for managing the use of the FSC® trademark, FCBA is responsible for monitoring each use of the FSC® trademark (on-product and/or promotional) made by the company.

The company wishing to use the FSC® brand must first submit a usage project to FCBA for approval at the following email address: logofsc@fcba.fr

The project is assessed by a person trained by FSC® in the approval of uses of the FSC® mark.

A written response is sent to the company. The company undertakes not to use the FSC® trademark until FCBA has given it a favorable response.

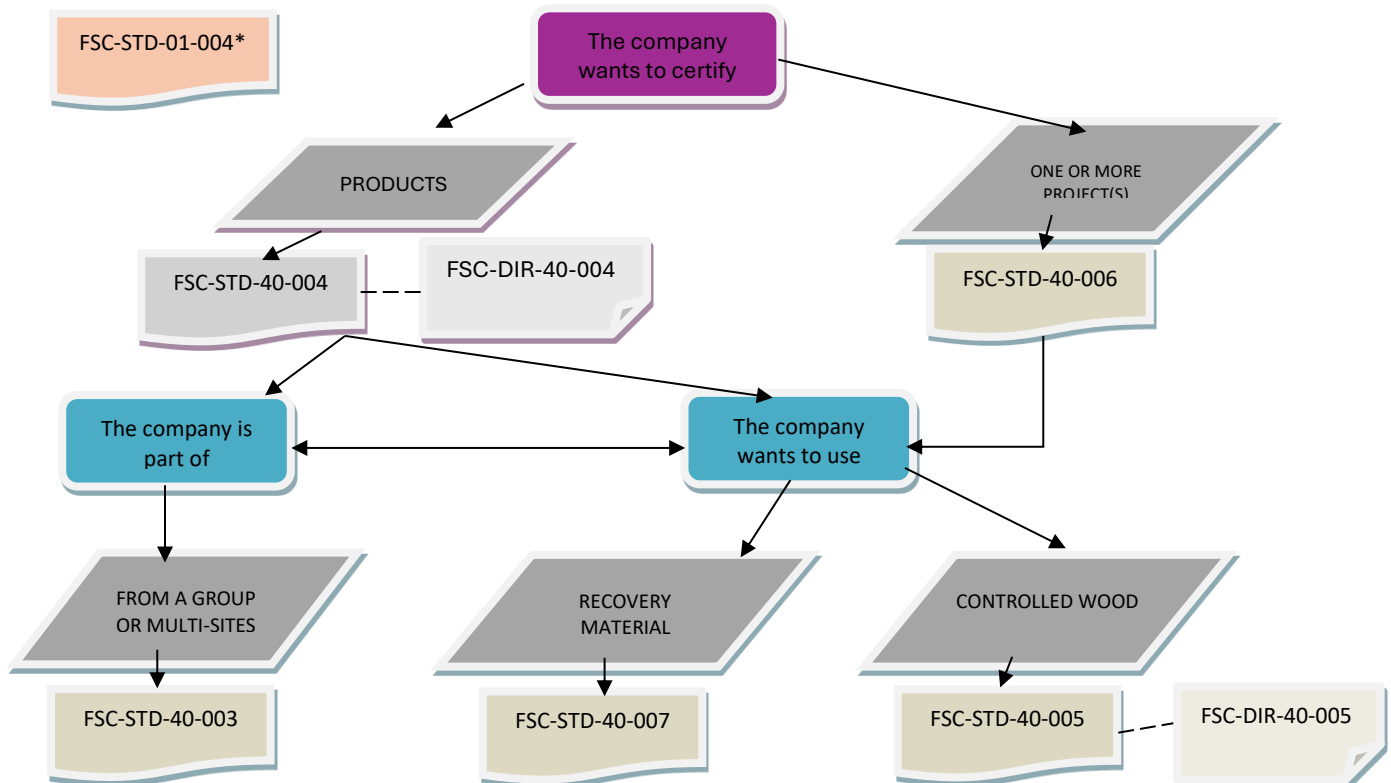
FSC® reserves the right to carry out additional monitoring if it deems it necessary.

Violations of the rules for using the FSC® trademark are handled as indicated in the paragraph on sanctions (see § 2.4.5.). In the event of abusive use of the FSC® trademark by third parties, FCBA informs FSC®.

7. Requirements for FSC® Chains of Custody

7.1. Flowchart of FSC® standards applicable by situation

The applicable versions of the standards are the latest made available on the site fsc.org “Document Center” section, when carrying out the audit.



(*) The Regulatory Module is a cross-cutting application on all applicable standards except the case of recycled products.

Through its FSC® accreditation scope, FCBA can only issue and/or maintain FSC® Chain of Custody certifications according to the standards described in paragraphs 7.2, 7.3, 7.4, 7.5, 7.6 and 7.7 below.

7.2. FSC-STD-40-004: General Chain of Custody Requirements

The company must comply with the requirements of the FSC-STD-40-004 standard to demonstrate the conformity of its Chain of Custody.

These are the minimum requirements to be met for Chain of Custody operations, in order to demonstrate that materials and products purchased, labelled and sold as FSC® certified are authentic and that the associated claims are truthful and accurate.

They are divided into 4 parts:

- Part I: General Chain of Custody requirements that apply to all chain of custody operations.
- Part II: Control operations for FSC® claims on outgoing products (product groups and methods: Transfer, Percentage, Credit).
- Part III: Additional requirements (thresholds for use of the FSC® mark on products, management of subcontracting).
- Part IV: Eligibility criteria for the different types of Chain of Custody certification (Single, Multi-site or Group Certificate).

FSC-STD-40-004 must be applied at each site covered by the certification.

7.2.1. FSC® Core Labour Requirements

Compliance with the FSC core labour requirements must be demonstrated across all activities covered by the FSC® certificate, including subcontracting activities. These requirements cover:

- Child labor;
- Forced or compulsory labor;
- Discrimination in employment and occupation;
- Freedom of association and the right to collective bargaining.

Even if the company is located in a country that already incorporates the FSC® core labour requirements, it is necessary to demonstrate compliance. To do this, the company must:

- a) Adopt and implement one or more policy statements, including the FSC® core labour requirements. The policy statements shall be made available to stakeholders (concerned and interested) and to FCBA, and
- b) Maintain a self-assessment in which the organization describes how it applies the FSC® core labour requirements to its operations. The self-assessment must be submitted to FCBA.

7.2.2. Certified activity subcontracting

In the event of outsourcing of certified activity, a risk assessment is carried out during the audit of the company, with its service providers under contract. FCBA evaluates the records of inputs and outputs of materials and the transport documentation associated with the materials used in the manufacture of FSC® certified products, during outsourcing.

For high risk situations, the audit of a sample of subcontractors is carried out as part of the annual monitoring, included in the respective subcontracting processes or activities within the limits of the company's Chain of Custody certificate.

NOTE: In the case of a multi-site or group system, the selection of subcontractors is coordinated with the selection of participating sites or group members that have entered into a corresponding subcontracting agreement.

The sampling number (y) is at least the square root of the number of high-risk subcontractors (x), rounded up to the next whole number: $y = \sqrt{x}$.

NOTE: Subcontractors who hold their own FSC® CoC certificate for the outsourced process and subcontractors who have not provided outsourcing services to the company since the last FCBA assessment, do not need to be assessed by FCBA and therefore be added to the number of subcontractors (x) in the formula above.

Records of material sourcing, production and shipping documentation associated with material used in the manufacture of FSC® certified products are assessed.

7.3. The FSC-STD-40-003 standard: Certificates for multiple sites (group and multi-site)

The company must comply with the requirements of the FSC-STD-40-003 standard to demonstrate the conformity of its Chain of Custody within the framework of a multi-site or group structure.

The special case of admissibility of several sites under the same simple CoC certificate is described in Annex 9).

Group certificate:

The group structure is only for small businesses that want to join together to obtain certification of their common FSC® Chain of Custody. It can be requested by businesses that are grouped together and all individually meet the following criteria:⁵:

- Less than 15 employees (without turnover limitation);
- Or less than 25 employees with a maximum turnover of one million euros.

Multi-site certificate:

The multi-site structure concerns a company whose FSC® Chain of Custody certificate covers at least two sites or legal entities (referred to as “participating sites” in the FSC-STD-40-003 standard) and meets the following criteria:

- All participating sites and the certificate holder company are linked by a common ownership structure (at least 51% of the shares of each participating site are held by the central office); or
- All participating sites:
 - Have a legal and/or contractual relationship with the company; and
 - Have common operational procedures (e.g. same production methods, product specifications, integrated management software); and
 - Are subject to a centrally administered and controlled management system established by the company whose authority and responsibilities are not limited to matters related to certification, and which includes at least one of the following aspects:
 - Centralized forest products purchasing or selling function;
 - Activities of different sites carried out under the same brand (e.g. franchise, distributor).

The following organizations are not eligible for Multi-Site Chain of Custody certification:

- Organizations that do not have authority over the addition or removal of participating sites from the certificate scope;

⁵Criteria may be adapted nationally and approved by FSC International. The list of approved eligibility criteria is available in Policy FSC-PRO-40-003a (see the latest version in force in the Document Centre of <https://fsc.org/>).

- Associations;
- Non-profit organizations some of whose members operate for profit.

Group and multi-site certificate:

In the case of multi-site and group certification, compliance with the FSC-STD-40-003 standard and the FSC-STD-40-004 standard must be demonstrated on all sites included in the certification scope.

Organization of audits:

Prior to organizing the audits, the company must carry out an internal audit of its system and send the report before the FCBA instruction audit.

The central office is audited every year. The audit allows to monitor the compliance of the multi-site entity, to verify the effectiveness of the monitoring provided by the central office and to update the risk assessment (criteria: non-conformities noted in internal or external control, complaints received, corrective and preventive actions, significant variations in the volume of activity, and changes made to the organization, the scope/perimeter or the distribution of responsibilities).

FCBA sampling method:

FCBA shall select a sample of participating sites for assessment of conformity to applicable FSC® normative documents. FCBA shall divide the participating sites into two (2) sets of sites: Normal Risk participating sites and High Risk participating sites (see GLOSSARY), which shall be sampled separately using the following formula:

- a) For main assessments, follow-ups and reassessments:

$Y = R \sqrt{X}$, where:

Y = Number of participating sites audited by FCBA (rounded up to the next whole number),

R = Risk index (see table A),

X = total number of participating Normal Risk or High Risk sites.

NOTE: In the case of Surveillance evaluations, participating sites that have not had FSC® activity since the previous FCBA audit do not need to be included in the set of sites (value "X" in the sample equation) from which the sample is drawn.

- b) For the integration of new participating sites (beyond the approved annual growth rate):

$Y = R \sqrt{N}$, where:

Y = Number of participating sites audited by FCBA (rounded up to the next whole number),

R = Risk index (see table A),

N = Number of new participating Normal Risk or High Risk sites to be added to the certificate scope.

Table A: Matrix for determining R (Risk Index)

RISK FACTORS		Note	Grade obtained
Property	All participating sites have a common owner	0.1	
	Participating sites do not have a common owner	0.2	
Certificate size	0 – 20 participating sites	0.2	
	21 – 100 participating sites	0.3	
	101 – 250 participating sites	0.4	
	251 – 400 participating sites	0.5	
	>400 participating sites	0.6	
Central Office Performance	No Corrective Action Request (CAR) issued to the central office (CO) at the last audit	0.1	
	Not applicable (there was no audit before)	0.1	
	Only minor DACs (Remarks) in BC at last audit	0.2	
	1 – 2 Major DACs (Non-Conformities) at the last audit	0.3	
	3 or more Major DACs (Non-Conformities) at the last audit	0.4	
Audit type	Annual monitoring	0.1	
	Renewal	0.2	
	Initial	0.3	
	For integration of new sites into the certificate	0.3	
TOTAL (R = sum of marks obtained)			Σ

The remainder of the sample is selected according to the following criteria: size of companies, type of supplies and products, use of Brands, non-conformities noted in internal control, complaints received, significant variations in the organization, scope/scope or responsibilities, geographical distribution.

To achieve the required sample size, the selection of chosen sites is done randomly and must be representative of the multi-sites or group being evaluated, in the broadest possible range in terms of:

- Geographic distribution;
- Activities and/or products manufactured;
- Size of participating sites (size may be determined by number of employees, production volumes and annual turnover/sales of forest products);
- Other criteria, as deemed relevant by FCBA.

If new members have been integrated since the previous audit, a sample is taken of the new members in addition to the sample of members already integrated at the time of the previous audit.

Maximum growth rate allowed for a group / multi-sites:

The annual growth limit for the number of sites operating in a group/multi-site must not exceed 100% (for structures with more than 20 sites) of the number of sites included in the group/multi-site during the previous audit.

If a company concerned wishes to exceed this rate, the sampling will be re-evaluated according to the number of new sites entering.

7.4. The FSC-STD-40-007 standard: recovered materials (post-consumer, pre-consumer)

This standard is intended to complement the FSC® CoC set of standards for cases where companies want to source non-certified reclaimed materials for use in an FSC® certified product according to FSC-STD-40-004, or in an FSC® certified project according to FSC-STD-40-006.

For participating companies or sites that have a supplier verification program, FCBA conducts annual verification audits of supplier sites, unless the supplier audits have been conducted by another FSC® accredited certification body. FCBA selects for assessment, at a minimum:

$Y = 0.8 \sqrt{X}$, where:

Y = Number of supplier sites audited by FCBA (rounded up to the next whole number),

X = Number of supplier sites audited by the participating site during the evaluation period.

NOTE: For group and multi-site certificates, the calculation of the vendor verification sampling will be done at the participating site level.

NOTE: FCBA is not required to audit sites already audited by participating sites during the same evaluation period.

7.5. The FSC-STD-40-006 standard: project certification

This standard specifies the requirements for achieving FSC® Chain of Custody certification for a project. For the purposes of this standard, the term “project” refers to the production or renovation of a construction or civil engineering project (e.g. office building, condominiums, event facilities such as a concert stage, trade show booth, wooden bridge), an individual art or decorative object (e.g. sculpture) or a transport vehicle (e.g. boat) made from or containing forest-based materials. Other items or products not included in this definition may be eligible for project certification upon approval by FSC®.

The company holding the project certificate will have to define the scope of the certificate with several parameters:

- a) The FSC standards applicable to the scope of the certificate (e.g. FSC-STD-40-006, FSC-STD-40-003, FSC-STD-40-007);
- b) Entities covered by a Group or Multi-site certificate as Participating Sites (if the FSC-STD-40-003 standard is applied in addition to the FSC® project standard);
- c) Whether it is a one-off certification (the certificate covers a single project) or permanent (the certificate covers several projects);
- d) For each project covered by the certificate, specify:
 - i. Name and description of the project (e.g. commercial building, wooden boat);
 - ii. Project site(s) specifying the name of the site or its unique identifier, as well as its address;
 - iii. The type of claim for the project:
 - a. Full project certification;
 - b. FSC claim for specific project components;
 - c. Percentage claim.
 - iv. The project member(s)⁶ working on or off the project site(s), indicating: the name of each project member, their contact details, a description of their role in the project, their FSC CoC certificate number (when the project member is FSC certified).

For one-off project certifications, FCBA conducts an initial audit, annual Surveillance evaluations and a final assessment when the project is completed. FCBA selects project members who are not FSC® certified for assessments, at a minimum:

$Y = 0.8 \sqrt{X}$, where:

Y = Number of project members who are not FSC® certified audited by FCBA (rounded up to the next whole number),

X = Total number of project members who are not FSC® certified (current and those who have completed their involvement in the project since the last assessment).

⁶A project member is an entity/company that purchases, processes and/or installs forest-based materials/products for a project (e.g. subcontractor, including joiners, carpenters, cabinetmakers, etc.).

For permanent project certifications, FCBA conducts an initial audit, annual surveillance evaluations and renewal audits according to the same scheme as for an FSC® Chain of Custody certificate. FCBA selects participating sites and project sites for assessments:

- a) If the project certificate contains sites participating in group and multi-site certificates (by application of the FSC-STD-40-003 standard): FCBA must select a sample of the participating sites according to the rules that apply to group and multi-site certificates. Participating sites that apply the Chain of Custody (FSC-STD-40-004) and project (FSC-STD-40-006) standards must be sampled separately by FCBA;
- b) For project sites, FCBA will select at least:

$Y = 0.8 \sqrt{X}$, where:

Y = Number of project sites audited by FCBA (rounded up to the next whole number),

X = Total number of project sites (current and those completed since last assessment).

7.6. The FSC-STD-40-005 standard: FSC controlled materials (FSC CW)

The company must comply with the requirements of the standard in order to be able to:

- Supply FSC Controlled Wood (FSC CW) to companies with an FSC certified chain of custody, for mixing with FSC certified material.
- Ensure that categories of wood considered unacceptable⁷, are not mixed with FSC certified wood.

The FSC-STD-40-005 is designed for companies to demonstrate the implementation of actions to prevent the trade of illegally logged timber, thereby supporting the International Forest Law Enforcement Management and Trade (FLEGT) programme. It enables companies to implement their responsible sourcing policy.

FSC-STD-40-005 must be applied at each site concerned by the certification or may, in the case of a multi-site, be managed at the central office level (except for site-specific requirements, such as training and information of personnel).

7.6.1. Evaluation of FSC Controlled Wood Programs

Analysis and description of the company's risk assessment

FCBA will conduct an analysis to ensure that the company's risk assessment has been implemented in accordance with the requirements set out in FSC-STD-40-005, in its currently valid version and any additional guidance provided or approved by the FSC PSU. FCBA will assess whether the results of the company's risk assessment are consistent with publicly available information related to the five FSC Controlled Wood categories (FSC Global Forest Registry and other publicly available sources).

If the Company's classification of supply areas differs from publicly available information, FCBA must ensure that the Company's classification is clearly justified and demonstrated.

FCBA will record the results of the company's risk assessments in the FSC database, using the format provided by FSC, within 7 days of issuance of the FSC Controlled Wood certification code.

⁷Illegally logged timber, timber logged in violation of civil and traditional rights, timber logged in forests where management activities threaten high conservation values, timber logged in forests being converted to plantations and not used as forests, timber from genetically modified forests

Evaluation of the company audit program

FCBA will assess whether the verification program that a company has implemented complies with all the requirements of FSC-STD-40-005. FCBA will verify whether information on the origin of the non-FSC certified wood supplied is properly included in the company's verification program for FSC Controlled Wood, duly justified and demonstrated.

Supplier level assessment (UGF - Forest Management Unit) for 'unspecified' risk sources

FCBA may conduct field audits at the Forest Management Unit (FMU) level to assess supplier compliance with the requirements of FSC-STD-40-005, for sources that cannot be confirmed as low risk.

If FCBA receives specific information of particular cases or allegations of non-conformity with aspects of FSC-STD-40-005, it will conduct a timely investigation of these cases. Such cases will be evaluated to determine whether they constitute a non-conformity or a remark to the requirements of FSC-STD-40-005.

The field audit of suppliers included in a company's verification program will be conducted by FCBA as soon as the initial audit, at the operational site level, has been completed. FCBA may have up to two months after the date of the main audit to complete the field audits. The annual sampling will include a maximum of 50% of the FMUs that the company has visited in the current assessment cycle of the company's verification program framework.

FCBA will classify the UGFs included in the Company's verification program as "identical" UGF sets for sampling purposes. Sets will be selected to minimize variability within each set in terms of: a) geographic location, b) forest type, c) operating size.

FCBA will choose a minimum number of UGF (x) for evaluation as follows:

For each 'similar' UGF set included in the company verification program (y) the company will choose at least 0.8 times the square root ($y=0.8 \sqrt{x}$) rounded up to the next whole number.

For each 'similar' UGF set (x) included in the company verification program, FCBA will choose as a minimum (y) 0.8 times the square root ($y=0.8 \sqrt{x}$) rounded up to the next whole number.

For each of the selected suppliers, FCBA will verify compliance with each of the FSC Controlled Wood categories that cannot be considered low risk according to FSC STD-40-005.

If another FSC accredited certification body has carried out a field visit to a UGF as part of the company's verification program, these sites may be excluded from the sample.

Compliance monitoring is ensured in accordance with the provisions presented in paragraphs 2.3 And 2.4. For FSC Controlled Wood assessment, non-conformity may be caused by:

- The absence of an effective SDR;
- Failure to legitimately apply the SDR to forest resources owned or managed by the organization;
- The organization's failure to ensure that its suppliers have taken corrective actions determined by the organization to ensure the organization's compliance with FSC-STD-40-005;
- The lack of independent information that demonstrates the origin of the material;
- The use of low risk designations that differ from those in approved national risk analyses;
- The organization's failure to demonstrate that its risk analysis has been carried out in accordance with applicable requirements;
- Evidence that the organization manipulated information used in the risk analysis to support a low risk designation;

- The use of material from non-assessed areas without FCBA having approved the organization's risk analysis;
- Failure to establish and implement adequate control measures;
- Failure to implement or inability to implement the complaints and claims management procedure;
- Failure to assess and mitigate the risk of mixing material with ineligible inputs in the non-certified supply chain;
- Failure to provide information that should be publicly available.

NOTE: Non-compliance at a supplier level will result in a deviation for the requesting company.

7.6.2. Organizations covered by FSC-STD-40-005

Additional assessment time will be assessed for:

- The feasibility review (before instruction cf. §2.1.3) ;
- The SDR revision;
- Stakeholder consultation;

Stakeholder consultation is conducted by FCBA during the initial audit or renewal audit of companies applying the requirements of FSC-STD-40-005 when materials come from areas with unassessed, specified or unspecified risk.

7.7. FSC® certification with the regulatory module for RDUE (FSC-STD-01-004 V1-0)

FCBA must ensure the compliance of the holder with the FSC regulatory module. For this, FCBA implements a system to assess the relevance, effectiveness and adequacy of the due diligence system (SDR or DDS or in English) in order to ensure that this same DDS is implemented by the holder of an FSC chain of custody, CoC, according to the applicable requirements provided and approved by FSC.

7.7.1. Preliminary assessment

Once the application file has been validated, FCBA carries out a documentary audit to assess the compliance of its holders with the applicable requirements of the regulatory module before extending the scope of the certification. The next audit will include a complete on-site assessment in order to ensure application. (§ 8.2.1.)

7.7.2. Revaluation

7.7.2.1. General

The reassessment of compliance with the requirements of the regulatory module is carried out at least once a year during the annual chain of custody audit. The frequency of assessments may be increased if:

Information regarding non-conformities or risks to the integrity of the supply chain is recorded,

Well-founded concerns from stakeholders that a product placed on the market poses a risk of not being in compliance with the regulatory module,

Notifications from the holder regarding non-conformities detected by the competent authority.

7.7.2.2. Assessment content

The assessments carried out by FCBA must

Include a review of information obtained, including complaints, appeals or allegations, that would indicate a risk of non-compliance with the FSC Regulatory Module.

Include a sample of purchase and sale documents in the scope of the FSC Regulatory Module. FCBA should record the reference numbers of the corresponding due diligence statement. Sampling should be carried out according to the scope, scale, intensity and risk of the licensee's operations.

Evaluate and confirm the plausibility of additional information and evidence associated with purchase and sale documents.

NOTE: Confirming plausibility means that the evidence can be corroborated by independent sources (e.g., verifiable public sources).

Confirm that inputs used in product groups, covered by the FSC Regulatory Module, have been supplied with a regulatory claim (where applicable).

7.7.2.3. Analysis of the holder's due diligence

a) Analysis

In order to ensure that the holder's DDS is properly implemented, FCBA must:

- Verify that information on materials and supply chains allows the licensee to confirm the origin of materials down to the land parcel and verify the time of production.
 - Verify whether information on materials and supply chains enables the holder to:
 - Confirm the origin of materials up to the land plot;
 - Carry out a risk assessment related to the origin of the materials;
 - Conduct a risk assessment of mixing materials with non-negligible inputs in supply chains;
 - Develop and implement control measures to mitigate or avoid risks; (e) review and, if necessary, revise the DDS to ensure its relevance, effectiveness or adequacy.
- NOTE: This includes verifying whether the holder has required its suppliers to notify it of any changes affecting the designation or mitigation of risks.*
- Ensure the accuracy of data used to support the holder's due diligence and must determine additional means of verification if there is a risk of non-compliance with certification requirements.

b) Data sampling rule

In case of data sampling, FCBA must specify and justify the sampling rate.

All documents used for DDS assessment shall be sampled randomly. When selecting documents to be sampled, the certification body shall not be guided or influenced by the organization's personnel.

c) Data verification

FCBA shall verify the accuracy of the data used to support the holder's due diligence and shall determine additional means of verification in the event of a risk of non-compliance with the certification requirements.

d) DDS Approval

Except for FSC 100% input materials, FCBA shall approve the holder's DDS (Due Diligence System) for the existing sourcing area, and/or extended to new sourcing areas, covering the risk assessment process for source risk and mixture risk, risk designation and corresponding mitigation measures (if applicable).

FCBA must approve a revised and updated DDS (Due Diligence System) in the event of a change in the risk designation from non-negligible risk to negligible risk, whether or not during the annual assessment.

7.7.2.4. Risk assessments

FCBA shall verify the correct use of applicable FSC risk assessments.

FCBA must verify whether the holder has reviewed and revised its risk assessment when necessary, in order to ensure its continued relevance and accuracy.

a) Verification of the holder's risk analysis

FCBA must verify whether the risk assessment and risk designations of the holder are adequate and justified.

b) Verification of the risk analysis on the material mixture

FCBA must verify whether the risk assessment related to the mixing of materials with non-negligible inputs during transport, processing and storage before the material reaches the holder is adequate for the scope of the DDS and justified.

c) Verification of the mitigation measures implemented

FCBA must verify the implementation and adequacy of mitigation measures.

7.7.2.5. Minimum content of the risk assessment summary

A brief description of the system by which the holder maintains control over all product groups under the FSC Regulatory Module should be added to the assessment conclusions.

7.7.3. Non-conformities with the regulatory module

7.7.3.1. Case of major non-conformity

The detection of one or more major non-conformities with the requirements of the FSC-STD-01-004 standard during a surveillance audit is considered a failure of the holder's management system and the extension granted to the regulatory module must be suspended within 24 hours following the certification decision.

Note: The suspension of the extension granted to the regulatory module is independent of the certification status of the other schemes.

7.7.3.2. Occurrence of non-conformities to regulatory module requirements

The occurrence of non-conformities of holders related to the FSC-STD-01-004 standard must be considered separately from non-conformities identified against other chain of custody and controlled wood certification requirements.

7.7.3.3. Obligation of the holder with regard to the detection of non-conformity

FCBA must ensure during annual assessments that the holder has informed the competent authority of non-conformities relating to non-compliant products and suspensions of the extension to the regulatory module.

7.7.3.4. Relationship between FCBA and the competent authority

The holder must inform FCBA upon receipt of a notification of any non-compliance noted by the competent authority. The non-compliance must be analyzed to ensure that it is indeed a non-compliance with the regulatory module and suspend the extension within 24 hours.

FCBA must provide, upon request, the competent authority with access to information relating to the holder's compliance with the FSC-STD-01-004 standard.

7.7.4. Non-conformities

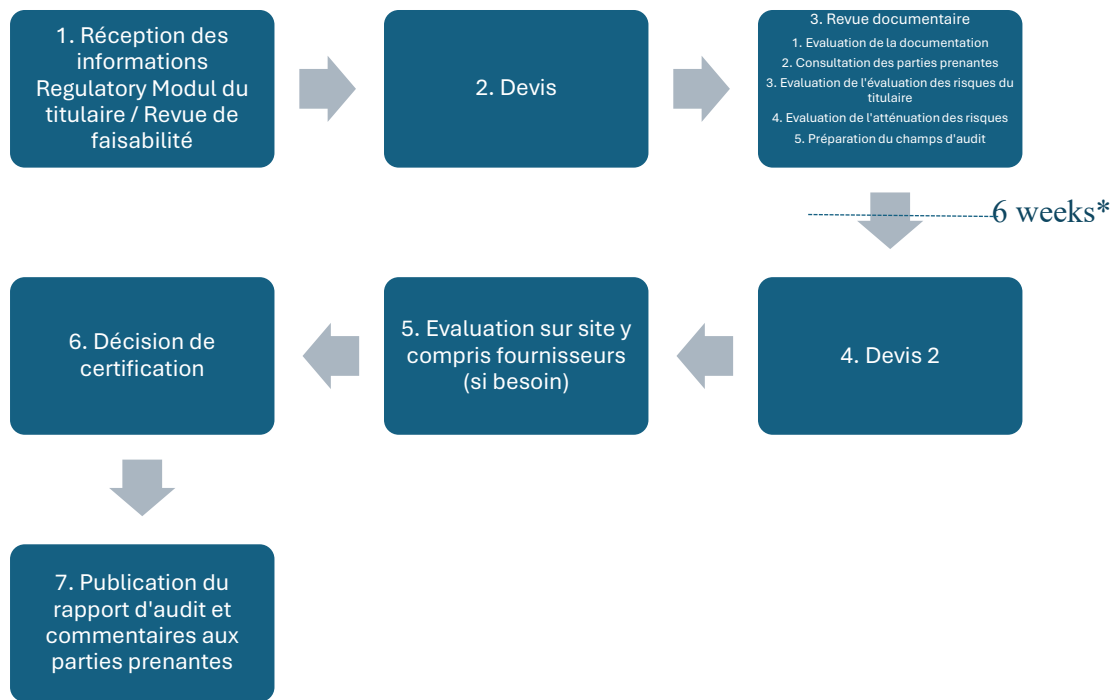
For evaluations within the scope of the FSC regulatory module, major non-conformities may be due to the organization's failure to comply with one of the applicable requirements, including but not limited to these.

Examples of major non-conformities to the requirements of the FSC Regulatory Module include:

- a) missing or incorrect information in the sales documentation (including supplementary documentation) relating to the FSC regulatory module (e.g. geolocation of the plot(s), date or time interval of production);

- b) ineffective segregation measures resulting in the mixing of regulatory material with non-eligible material;
- c) false or incorrect regulatory claims about ineligible material;
- d) the absence or failure to implement a complaints procedure;
- e) evidence that the organisation manipulated information relating to compliance with timber legality legislation;
- f) failure to provide necessary assistance to the competent authorities.

7.7.5. Flowchart of FSC® Certification with the regulatory module for the RDUE



(*) Minimum time required for consultation with stakeholders

GLOSSARY⁸

FSC® Accreditation: formal recognition that a certification body is competent to assess the compliance of forest management companies with the standards of good forest management recognized by FSC® and/or is competent to assess the compliance of companies operating, trading, processing and distributing products of forest origin with the Chain of Custody standards recognized by FSC®.

Internal audits: Internal audits monitor the activities of participating sites and are carried out by the central office to ensure that all certification requirements (including appropriate certification standards and other requirements of the certification body) are fully implemented.

Internal audits are conducted as initial audits of candidates (applicants) prior to being admitted as a participating site and as annual audits to confirm continued compliance with all certification requirements. They include a visit to the operational site and a review of documented systems.

Competent authority: National bodies designated in the various EU Member States responsible for implementing the Regulation and monitoring its compliance.

In France, a joint competent authority is designated, composed of:

- Ministry of Ecological Transition and Territorial Cohesion
- Ministry of Agriculture and Food Sovereignty

FSC® Controlled Wood or FSC® Controlled Wood: material or product to which the claim “FSC® Controlled Wood” is attributed. FSC® Controlled Wood is not considered an FSC® certified product.

Central office: an identified central function (e.g. office, department or person) of a Multi-Site or Group Organization that has the ultimate management responsibility for maintaining the certification contract with the Certification Body and for maintaining the Chain of Custody system. It ensures that the appropriate requirements of the Chain of Custody certification standards are met by the participating sites included within the boundaries of the Multi-Site or Group Certificate.

Certificate: document issued in accordance with the requirements of a certification system by which a certification body grants a person or organization the right to use conformity marks for its products, processes or services in accordance with the rules of the particular certification system relating to them.

Certification: procedure by which a third party gives written assurance that a product, process or service conforms to requirements.

Chain of Custody Certificate: a certificate is a document issued in accordance with the rules of a certification system, indicating that adequate confidence is granted provided that a product, process or service is duly identified, in accordance with a specific standard or other normative document [ISO/IEC Guide 2:1991 clause 14.8 and ISO/CASCO 193 clause 4.5].

A Chain of Custody certificate issued by an FSC® accredited certification body provides credible assurance that there are no major failures in accordance with the requirements of the specified certification standard(s) at any operational site within the scope of the certificate.

In the FSC® certification system there are three types of Chain of Custody certificates:

- Simple Chain of Custody Certificates
- Group Chain of Custody Certificates

⁸For any specific definitions outside of this document see the official FSC standards.

- Multi-Site Chain of Custody Certificates

Chain of Custody (CoC): tracking the flow of materials from their origin to their final use.

Registration: document proving the implementation by a company of the procedures established to meet the requirements of a standard.

Candidate company: organization wishing to obtain a certificate from a certification body.

Company owner: organization that has obtained a certificate from a certification body and maintains its compliance with the requirements.

Group entity: independent legal entity that applies to FCBA for group certification. This can be an individual, a cooperative, an association or any other legal entity.

Product groups: the company must define the products or groups of products that share the same batch of incoming materials in similar proportions, and which will be tracked separately. These may be solid wood products, assembled products or reconstituted products.

FSC Logo®: The FSC® logo consists of a half tree and a half tick mark together with the initials FSC®. It is designed to be used on labels, declarations and wood products certified under the FSC® certification system. FSC® is an internationally registered trademark and its use is controlled by legally binding contracts.

FSC® Trademarks (“FSC® Trademarks”): the initials “FSC®”, the words “Forest Stewardship Council®” and the FSC® Logo are registered trademarks.

Controlled material: input received without FSC® claim, assessed as compliant with the requirements of standard FSC-STD-40-005.

Chain of Custody Number: unique code or number issued by the FSC® accredited certification body to a Chain of Custody certificate holder.

Multi-site organization: an organization having an identified central office and a network of at least two sites. The products of these identified sites, covered under a multi-site certificate, must be of the same kind and must be fundamentally produced or handled according to the same methods and procedures.

Origin: for virgin materials, this is the forestry sector where the trees for fiber or wood were extracted. For reclaimed materials, this is the place where the material was classified as reclaimed.

Stakeholder:

- Affected Stakeholders: Any person, entity or group of persons who are subject to or may be subject to the effects of the Company's activities. This may include, but is not limited to, workers, persons, entities or groups of persons located or working in the Company's operations and sites.
- Interested Stakeholders: A person, group of persons or entity who has shown an interest, or is known to have an interest, in the activities of the company.

Scope (perimeter, limits, field, scope of application): sites, product groups and activities of the organization that are included in the assessment by an FSC® accredited certification body, as well as the certification standard(s) against which these have been verified.

Procedure: document by which an organization specifies the operations to be carried out, the persons concerned and the records to be collected to ensure compliance with a standard.

Certified product: forest product covered by a valid Chain of Custody certificate and eligible to bear the FSC® Logo.

Common ownership: An ownership structure in which all sites covered by the chain of custody certificate are owned by the same organization. Ownership means holding at least 51% of the capital of the sites concerned.

FSC® Certification Report: report written by a qualified auditor following the audit of a company according to the FSC® standard, which describes the methodology used for the assessment, establishes the results of the assessment and makes recommendations as to whether certification should be granted.

Participating site: Site included in the scope of a multi-site or group COC certificate. Subcontractors that are used under subcontracting agreements are not considered participating sites.

High Risk Participating Sites: Participating sites operating a supplier verification program for recovered materials according to FSC-STD-40-007 and/or high risk of outsourcing to non-FSC® certified companies.

Participating sites in Normal Risk: Participating sites not conducting activities considered “high risk” as above.

Site: a single functional unit of an organization located in a single location, geographically distinct from other units of the same organization. Secondary sites of an organization may be considered part of a site if they are an extension of it without independently performing a purchasing, processing or sales function (e.g. remote storage site).

Service providers engaged under a subcontracting agreement (e.g. outsourced warehouse) are not considered sites.

Typical examples of sites are marketing or product processing facilities, such as industrial sites, sales offices or warehouses owned by the organization.

Under number: Certification bodies assign an alphabetical, numeric or alphanumeric sub-number for each participating site in multi-site and group certificates. This sub-number will be used for internal archiving and data management by FSC®.

Subcontracting: the practice of outsourcing the performance of an internal process (activities or tasks that generate a specific service or product) to another organization. The outsourced activities do not generally take place within the organization's establishments. However, the organization may enter into subcontracting agreements with other companies operating within its establishments when it does not have control or supervision of the activities carried out by the service provider.

Note: For any specific definitions outside of this document see the official FSC standards.

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Annex 1: List of documents for companies applying for FSC® Chain of Custody certification

FCBA must provide candidate companies with complete and precise information on the procedures and obligations of FSC® Chain of Custody certification according to the following table:

Label	Reference document	
Information about FSC®	Reference	Chapter 1.1 and 1.2
Authority under which FCBA operates	Reference	Chapter 1.2
Relations between FSC® and FCBA	Reference	Chapter 1.3
Relationship between FSC® and the holder company	Reference	Chapter 3 and 7.1
Application and evaluation procedures	Reference	Chapter 2
Certification standards	Reference	Chapter 7
Use of the FSC® brand (logo, label, declarations, etc.)	Reference	Chapter 6
Structure and policy of the AAF	Reference	Chapter 4 and Annex 10
Application Form	Reference	Annex 3
Assessment and certification contracts	Reference	Chapter 3
Certification system	Reference	Chapter 1
Procedures for handling complaints and appeals	Reference	Chapter 5
List of holders	Made available on the internet	https://info.fsc.org/

Annex 2: FSC® Chain of Custody Certification Request Letter

(To be established on the letterhead of the candidate company)

FCBA
10 Rue de Galilée
CS 81050 Champs sur Marne
77447 MARNE LA VALLEE Cedex 2

For the attention of the Certification Director

Subject: Request for certification of the Chain of Custody of FSC® certified products

Mr. Director,

I have the honour to request certification of my Chain of Custody according to the FSC® system for the following category

(designation of the scope of application and the product range(s) exercised by:

.....(identification of the applicant);

..... (company name);

..... (address of the main establishment);

(identification of the sites concerned).

To this end, I declare that I know and accept the Chain of Custody standard for wood and/or wood-based products and the FSC® reference texts and undertake to comply with them throughout the duration of use of the FSC® brand.

I undertake to immediately inform FCBA of any planned change to the scope of my certificate and in particular not to market FSC® certified products following these changes until FCBA has given me its agreement to this effect.

I declare that I have the authority to make this request.

Please accept, Mr. Director, the expression of my highest consideration.

Date and signature of the applicant's legal representative

Annex 3: Application form for FSC® Chain of Custody certification



Annex 3: Application form for FSC® Chain of Custody certification



1. Company contact details

Company Name:	Legal status:
Address :	
Postal code:	City :
Phone :	Fax:
Website:	
SIRET No.:	APE code:
Turnover year n-1:	Number of employees:

2. Contact person and person responsible for monitoring certification within the company

Name, First name:	Function :
Phone :	Fax:
E-mail address :	

3. Company information

3.1 Is the company part of a Group or another company? If yes, please provide the name of the Group or company.

.....

3.2 Type of business

<p>DISTRIBUTION :</p> <p><input type="checkbox"/> Broker / Dealer / Agents without physical possession of matter</p> <p><input type="checkbox"/> Trader / Wholesaler Physical possession of matter without transformation</p> <p><input type="checkbox"/> Trader / Retailer Sale of finished products</p>	<p>TRANSFORMATION:</p> <p><input type="checkbox"/> 1st Transformation Use of logs in supply</p> <p><input type="checkbox"/> 2nd Transformation Any other transformation than the 1st</p> <p><input type="checkbox"/> Printer</p> <p><input type="checkbox"/> Editor</p>
---	---

Brief description of your company's productions and activities:

.....

.....

.....

.....

3.3 Site(s)

Specify the number and type of sites (e.g. sawmill, warehouses, factory, etc.) with their addresses if different from part 1

Please note that any entity falling within the following definition given by the FSC (FSC-STD 20 001 latest applicable version) must be considered as a site in its own right:

Site: A distinct functional unit of an enterprise physically located at a specific location, which is geographically distinct from other units of the same enterprise.

This type of unit can, however, still allow the establishment of a simple certificate if it is an extension of the company, without purchasing activity, without transformation activity, without sales functions (for example, a storage site).

A site can never include more than one legal entity.

Contractual workers engaged under a subcontracting agreement (e.g. a subcontracting warehouse) are not considered sites.

Typical examples of sites include sites with processing and/or trading activities, such as production sites, sales offices or internal company warehouses.

Total number of sites:	Number of sites to be included in the certificate:
<u>Site name/type</u>	<u>Addresses</u>

Attach additional list if needed

3.4 Management of certified products(for transformers, please choose the management mode if known)

We will manage FSC® certified material separately from non-certified material

We will mix FSC® certified material with non-certified material in production

3.5 Certifications requested or obtained in the last five years (FSC® COC or other forest certification schemes)

N / A

Have you applied for certification from other certification bodies?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, for each certification, please indicate the name of the certification, the name of the certification body and whether an initial audit was carried out:
Have you obtained any certifications (current or previous)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, for each certification, please indicate the name of the certification, the name of the certification body and the certificate expiry date: In case of FSC® COC certification, please indicate the FSC® COC certificate number:

3.6 Consulting services received over the last three years

Have you received any consulting services related to FSC® COC certification?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, please indicate the end date of the intervention and the name of the organization:
--	--	--

4. Intended scope of certification			
4.1 FSC® Certified Sourcing (existing / potential)		<input type="checkbox"/> N / A	
Specify the FSC® certified material (e.g. log, sawn timber, veneer, panels, pulp, paper, cardboard, packaging, publishing, etc.), with the wood species, if applicable (e.g. Pinus sylvestris; Pinus radiata; Quercus robur; Fagus sylvatica; Abies alba; Milicia excelsa, etc.).			
4.2 NON-Certified and NON-Recovered Supply		<input type="checkbox"/> N / A	
Specify whether non-certified and non-recovered material may be included in the composition of FSC Mixed and/or FSC® Controlled Wood products. NB: non-certified and non-recovered virgin inputs must comply with the requirements of the FSC-STD-40-005 standard (see § 7.6.).			
4.3 Recovery Supply, NON-Certified		<input type="checkbox"/> N / A	
Specify whether non-certified recovered material (post- and pre-consumer) is likely to be included in the composition of FSC Mixed or FSC Recycled products. NB: non-certified recovered inputs must comply with the requirements of the FSC-STD-40-007 standard (see FCBA DQ CERT standard §7).			
<input type="checkbox"/> Post-consumer (recycled after use as a finished product)		<input type="checkbox"/> Pre-consumer (recycled after non-voluntary production, in a different process than the one that produced it)	
Specify (% and types):		Specify (% and types):	
4.4 FSC® Chain of Custody System			
<input type="checkbox"/> Transfer		<input type="checkbox"/> Percentage	<input type="checkbox"/> Credit
4.5 Types of products to be FSC® certified (existing / potential)			
Specify the types of products covered by FSC certification as defined in FSC-STD-40-004a (e.g. W1.1: Lumber or industrial timber (logs); W8.2.3: Oriented strand board (OSB); W13.5: Landscape decking and sleepers; P5.1: Cardboard packaging; P8.2: Magazines; N6.3.1: Christmas trees; N9.4: Mushrooms, truffles; etc.).			
4.5 FSC® category of materials to be certified			
<input type="checkbox"/> FSC 100%	<input type="checkbox"/> FSC MIXED	<input type="checkbox"/> FSC RECYCLED	<input type="checkbox"/> FSC CONTROLLED WOOD
4.6 Subcontracting		<input type="checkbox"/> N / A	
Specify whether you intend to have part of the activities included in the scope of the FSC® Chain of Custody (e.g. processing, production, storage of FSC® products) carried out by subcontracting companies (Please include a description of the possible activities sent to subcontractors and the number of possible subcontractors).			
Number of subcontractors:			
Subcontracted activities:			
4.7 Multi-site Certification (if yes, complete the additional form) YES <input type="checkbox"/> NO <input type="checkbox"/>			

Applicable if you are: a company with several facilities wishing to obtain certification under a multi-site certificate and a multi-site management structure with a central office. NB: other requirements apply to multi-site management according to the FSC-STD-40-003 standard (see FCBA DQ CERT standard §7).

4.8 Group Certification (if yes, complete the additional form) YES NO

Applicable if you are: an organized group of small businesses wishing to obtain certification under a group certificate and a group management structure with a group manager. NB: other requirements apply to group management according to the FSC-STD-40-003 standard (see FCBA DQ CERT standard §7).

5 Audit planning

Audit readiness level: For example, is the company ISO compliant, can the company trace its production and sales supplies, are key personnel familiar with FSC® certification standards, has the company already written down its FSC® procedures?

Desired date/deadline for initial audit:

Desired date/deadline for certification:

I, _____ (Name and surname) declares on his honour that this information is accurate and agrees to provide any other information necessary for the audit of the Chain of Custody of the products to be certified.

Done at: _____

THE : _____

Name and surname of the signatory: _____

Signature :

Please send your request to:
 Certification Assistant
 FCBA Institute
 Certification Assessment Team
 10 rue Galilée
 CS 81050 Champs sur Marne
 77447 MARNE LA VALLEE Cedex 2
 Tel: +33(0)1 72 84 97 52
 e-mail: certification-biosense@fcba.fr

Annex 4: Supplementary form for FSC® Multi-site or group Chain of Custody certification



Annex 4: Supplementary form for FSC® Chain of Custody certification Multi-site or group



Multi-site Certification

Specify whether you are a company with multiple facilities wishing to obtain certification under a multi-site certificate and a multi-site management structure with a central office. NB: other requirements apply to multi-site management according to the FSC-STD-40-003 standard (see FCBA DQ CERT standard §7).

Brief description of the company's management structure:

Attach documented evidence justifying the common ownership between the central office and the participating sites (at least 51% of the shares of each participating site are held by the central office) or the legal and/or contractual link between the central office and the participating sites in accordance with the FSC-STD-40-003 standard.

Group certification

Specify whether you are an organized group of small companies wishing to obtain certification under a group certificate and a group management structure with a group manager. NB: other requirements apply to group management according to the FSC-STD-40-003 standard (see FCBA DQ CERT standard §7).

Brief description of the types of businesses to be included in the certificate:

Information on participating or group member sites

Types of businesses to be included in the certificate (check all that apply)

<p>DISTRIBUTION :</p> <p><input type="checkbox"/> Broker / Dealer / Agents without physical possession of matter</p> <p><input type="checkbox"/> Trader / Wholesaler Physical possession of matter without transformation</p> <p><input type="checkbox"/> Trader / Retailer Sale of finished products without processing</p>	<p>TRANSFORMATION:</p> <p><input type="checkbox"/> 1st Transformation Use of logs in supply</p> <p><input type="checkbox"/> 2nd Transformation Any other transformation than the 1st</p> <p><input type="checkbox"/> Printer</p> <p><input type="checkbox"/> Editor</p>
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Sites

Main Central Office, Group Manager and Regional Offices

This information about the management structure helps determine the intensity of sampling to be carried out according to FSC® requirements.

Site	Address	Business Type	Responsible person

Attach additional list if needed

Participating or group member sites

In the following table, please provide details of the participating or group member sites to be included in the certificate. This information will be used to determine the appropriate sample and selection of sites for the initial audit.

<u>Site Name</u>	<u>Address</u>	<u>Business Type</u>	<u>Turnover</u>

Attach additional list if needed

Please send your request to:
 Certification Assistant
 FCBA Institute
 Certification Assessment Team
 10 rue Galilée
 CS 81050 Champs sur Marne
 77447 MARNE LA VALLEE Cedex 2

 Tel: +33(0)1 72 84 97 52
 e-mail: certification-biosense@fcba.fr

Annex 5: Letter requesting modifications

(To be established on the letterhead of the company holder)

FCBA
10 Rue de Galilée
CS 81050 Champs sur Marne
77447 MARNE LA VALLEE Cedex 2

For the attention of the Certification Director

Subject: Request for modification of the certification of the Chain of Custody of FSC® certified products

Mr. Director,

As holder of the FSC® Chain of Custody certificate, under the number:

FCBA-COC-.....,

I have the honour to request the modification of the terms of my certificate following:

- Legal changes
- Business Changes
- Change of scope/scope, supply sourcing
- Other(to specify):

To this end, I declare that I know and accept the Chain of Custody standard for forest products and the FSC® reference texts and undertake to respect them for the entire duration of use of the FSC® brand.

I declare that I have the authority to make this request.

Please accept, Mr. Director, the expression of my highest consideration.

Date

Name and signature of the legal representative of the holder

Annex 6: Modification request form

1. Company contact details

Company Name:.....
 Address :.....
 City :..... Postal code:.....
 Phone :..... Fax:.....
 Email address:.....

2. Person responsible for monitoring certification within the company

Name, First name: Function :.....
 Phone :..... Fax:.....
 E-mail address :.....

3. Modifications

Legal changes (specify: acquisition, merger, creation of new establishment, change of legal representative, etc.):.....

Commercial modifications (specify change or addition of names or brands, etc.):.....

Modification of the scope/scope, description (add a list in the Annex if necessary):

Type of modification (addition/deletion of product group and/or sites in the certificate)	FSC* product category	Essence(s)	Control system (transfer, percentage, credit)	FSC Claim(s)	Sites concerned (in case of multiple sites in the certificate)

*according to the classification of the current FSC-STD-40-004a standard

Other (title):.....

Annex 7: Letter of request for approval of the FSC® Trademark Management System

(to be established on the letterhead of the company holding the title)

FCBA
10 Rue de Galilée
CS 81050 Champs sur Marne
77447 MARNE LA VALLEE Cedex 2

For the attention of the Certification Director

Subject: Application for approval of the FSC® Trademark Usage Management System (self-validation)

Mr. Director,

As holder of the FSC® Chain of Custody certificate, under the number:

FCBA-COC-.....,

And the FSC® brand license, under the number:

FSC®-C.....,

I have the honour to request approval of my FSC® Trademark Use Management System based on an internal control system for the following uses:

Promotional Uses of FSC® Marks

Number of promotional uses made over the last 12 months:

over-product uses of FSC® Brands

Number of usessurplus products made in the last 12 months:

To this end, I declare that I know and accept the Chain of Custody standard for forest products and the FSC® reference texts and undertake to respect them for the entire duration of use of the FSC® brand.

I declare that I have the authority to make this request.

Please accept, Mr. Director, the expression of my highest consideration.

Date

Name and signature of the legal representative of the holder

Annex 8: Method diagrams

Comparison of transfer, percentage and credit systems

For informational purposes:

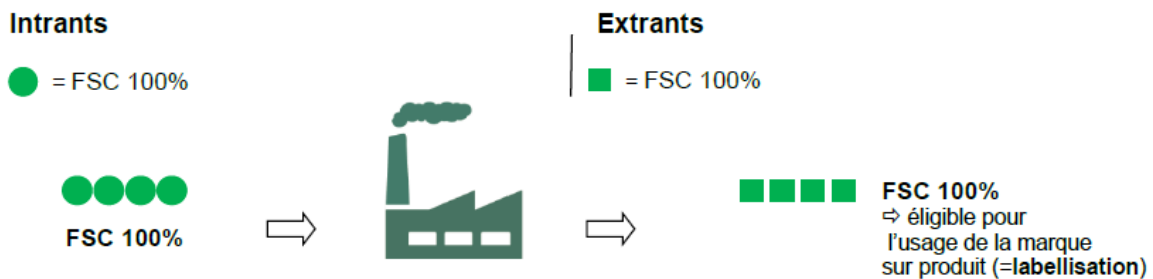
The following charts explain the basis of the various functionalities of the Chain of Custody system to manage FSC® claims. For each of the systems, only eligible supplies can be integrated into the FSC Chain of Custody (supplies with claims FSC 100%, FSC MIX x%, FSC MIX Credit, FSC Recycled x%, FSC Recycled Credit, FSC Controlled Wood; or material controlled according to the FSC-STD-40-005 standard, or recovered material (pre-consumer or post-consumer) controlled according to the FSC-STD-40-007 standard):

1- The transfer system

Under this system the material category and associated percentage claim with the lowest FSC® input (for virgin material inputs) or post-consumer input (for recovered material inputs) per volume of input must be identified.

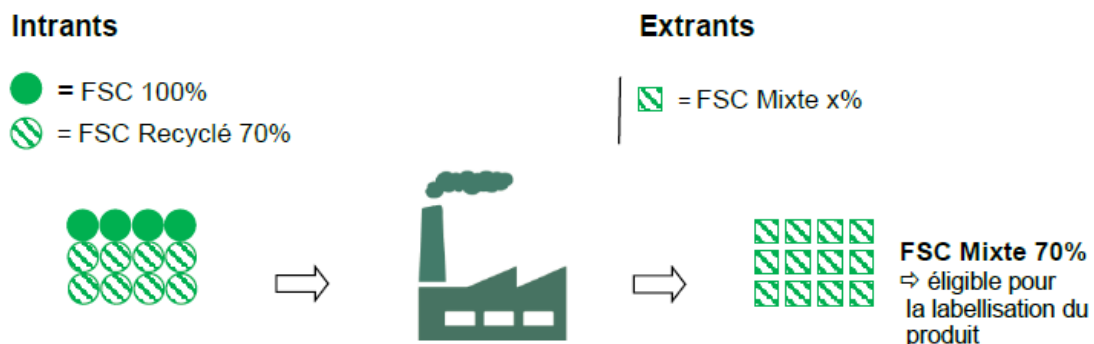
NOTE: The transfer system cannot be applied to mixtures of virgin and recovered materials or to material mixtures that do not include either FSC® material input or post-consumer input.

Scenario A: Material sourcing with a single FSC® claim (without mixing of supplies with different claims)



The transfer system is particularly useful for cases where only a single input material is used as for example in the case of the product groups "FSC 100%". In these cases the sourcing claim is simply transferred to production.

Scenario B: Sourcing with different FSC® claims



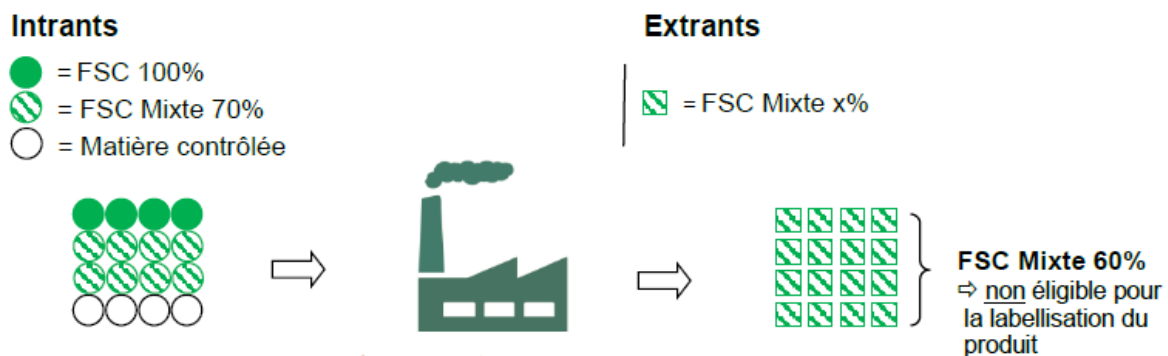
In the second example a mix of “FSC 100%” and “FSC Recycled 70” material supplies is used. In this case, the material category with the lowest FSC® claim is “FSC Recycled 70%”; the 70% percentage will then be transferred to the applicable FSC® claim for production. However, the output claim can no longer be “FSC Recycled” because virgin fibre supplies are mixed with this recycled fibre. The resulting output claim will then be “FSC Mixed 70%”.

This scenario is applicable for users who are unable or unwilling to calculate the exact FSC® percentage for their production, but only wish to ensure a certain minimum of FSC® claim for their productions.

2. Percentage system

Under this system all production can be sold with a percentage corresponding to the proportion of FSC® input and post-consumer recovered material input compared to the total input (the entire supply being eligible for the FSC Chain of Custody).

Scenario C: Sourcing with different FSC® and non-FSC® claims (controlled material)

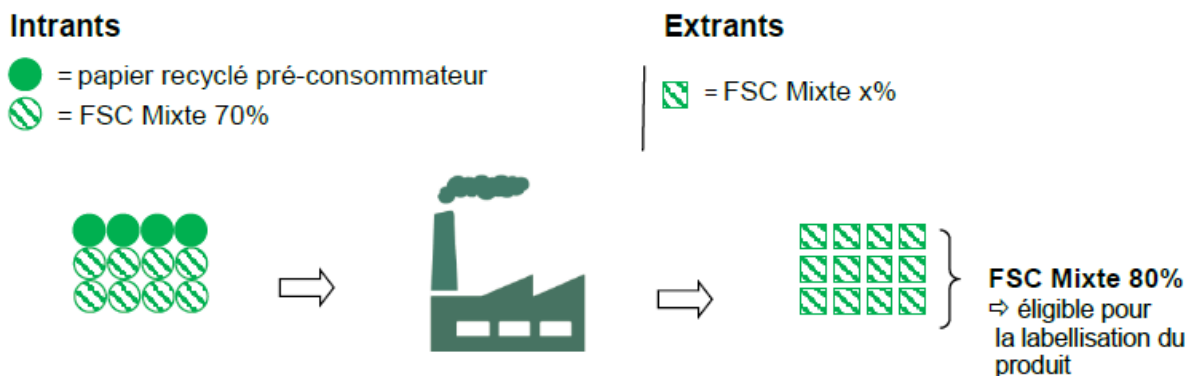


The FSC® claim for production is calculated as follows:

4 units of 100% FSC input
 8 units of FSC Mixed 70% input
 4 units of controlled material input
 (control according to the FSC-STD-40-005 standard)

$$\frac{(4 \times 1) + (8 \times 0,7) + (4 \times 0)}{4 + 8 + 4} \times 100\% = \frac{4 + 5,6 + 0}{16} \times 100\% = 60\%$$

Scenario D: Supplies with a combination of two or more inputs from different material categories



The FSC® claim for production is calculated as follows:

4 units of pre-consumer recovered paper input
 (control according to FSC-STD-40-007 standard)
 8 units of FSC Mixed 70% input

$$\frac{(4 \times 1) + (8 \times 0,7)}{4 + 8} \times 100\% = \frac{4 + 5,6}{12} \times 100\% = 80\%$$

Note: Pre-consumer and post-consumer recovered paper products are considered equivalent and contribute to the FSC claim. This is not the case for pre-consumer recovered wood products which do not contribute to the FSC claim, while post-consumer recovered wood products contribute to the FSC claim.

Annex 9: Eligibility criteria for certification of a simple Chain of Custody involving several sites

A simple Chain of Custody certificate may include within its scope Chain of Custody operations of multiple legal entities (different sites) under the following conditions:

1. One of the sites covered by the Simple Chain of Custody certificate:
 - i. Takes on the role of certificate holder;
 - ii. Is responsible for invoicing certified and non-certified materials or products included in the scope of the certificate to external customers;
 - iii. Controls the use of FSC® brand elements.

2. All sites covered by the Simple Chain of Custody certificate scope:
 - i. Operate under a common ownership structure;
 - ii. Are managed under the direct control of the certificate holder;
 - iii. Maintain exclusive business relationships with each other for the materials or outgoing products covered by the scope of the certificate;
 - iv. Are located in the same country.

NOTE: All applicable certification requirements as defined in FSC-STD-40-004 shall be assessed by FCBA on all sites included in the scope of the certificate during each audit (no sampling applies). The requirements specified in FSC-STD-40-003 for Multi-Site or Group Organizations do not apply to single Chain of Custody certificates with multiple sites.

Annex 10: Financial regime

1 – PRICES

Our rates include:

- registration fees (including application processing costs);
- preparation of audits;
- on-site audits;
- writing audit reports.

The price list for FSC® services may be revised annually on the basis of the engineering index (ING Index), taken with reference to the month of May of each previous year.

In concrete terms, this means that the rates for services may change on 1 January of year n by applying the ING index obtained in May of year n-1 (change measured between May n-1 and May n-2). The use of the index is as follows:

$$P1 = P0 \times \frac{S1}{S0}$$

Or :

P1 corresponds to the revised price,

P0 corresponds to the original contract price,

S0 corresponds to the reference index retained on the original contractual date,

S1 corresponds to the latest index published on the revision date.

FCBA will communicate the revised price list to all holders at the latest at the start of each new calendar year, where applicable.

2 – TRAVEL EXPENSES

Travel expenses are billed at actual cost or pro rata to the number of companies visited on the same trip.

3 – BRAND PACK FSC®

The FSC® Brand Pack defines the rules for the use of the FSC® logo. It is sent in the form of an automatic email giving access to the FSC® Trademark Portal on the Internet when sending the FSC® Chain of Custody certificate. This will be invoiced in accordance with our price list and must be included in each FSC® Chain of Custody quote.

4 – PREPARATION OF QUOTES

| The estimate is established over 5 years (duration of an FSC® certificate).

5 – BILLING

Invoices will be issued at the end of each service.