

Adopted by the Extraordinary General Assembly of the PEFC Belgium

on 27 June 12

Table of contents

Foreword	3
Introduction	4
1. Scope.....	4
2. Normative references.....	4
3. Definitions	5
3.1. Chain of custody standard.....	5
3.2. Client organisation	5
3.3. Major nonconformity.....	5
3.4. Minor nonconformity.....	5
3.5. Observation.....	5
4. Certification body	5
4.1. General provisions	5
4.2. Confidentiality	6
5. Certification body personnel.....	6
5.1. Personnel involved in the certification activities	6
5.2. Auditors.....	6
5.2.1. Education.....	6
5.2.2. Chain of custody training.....	7
5.2.3. Audit training.....	7
5.2.4. Working experience	7
5.2.5. Audit experience	7
5.2.6. Competencies	7
5.3. Audit Team.....	8
6. Changes in the certification requirements	8
7. Appeal complaints and disputes.....	8
8. Certification Application.....	8
9. Preparation for evaluation	9
10. Evaluation	10
10.1. General requirements.....	10
10.2. Duration of initial audits	10
11. Evaluation report.....	11
12. Decision on certification	11
12.1. Nonconformities.....	11
12.2. Certification document.....	12
13. Surveillance	13
13.1. Audit requirements	13
14. Usage of licences, certificates and marks of conformity	14
14.1. Use of PEFC Logo.....	14
15. Complaints to suppliers.....	14

Annex 1 – Accreditations accepted by the PEFC Council.....	15
Annex 2 – PEFC notification of certification bodies	16
Annex 3 – Multi-site chain of custody certification	17
0. Introduction.....	17
1. Eligibility criteria for the multi-site client organisation	17
2. Eligibility criteria for the certification body	17
2.1. Contract Review.....	18
2.2. Audit.....	18
2.3. Nonconformities	18
2.4. Certificates.....	19
3. Sampling for on-site audits	20
3.1. Methodology	20
3.2. Size of sample	21
3.3. Audit Times.....	22
3.4. Additional Sites	22

Foreword

The text of the document has been developed by the PEFC Council (Programme for the Endorsement of the Forest Certification schemes) and International Accreditation Forum, Inc. (IAF), and approved by the Extraordinary General Assembly of PEFC Belgium on 27 June 2012. The requirements of the document becomes effective for all certification bodies operating chain of custody certification against PEFC ST 2002:2010, *Chain of Custody of Forest Based Products - Requirements* as of 27 June 2013 (one year from the adoption) except the requirements of chapter 5.2.2 which become effective on 27 June 2014 (two years from the adoption).

The PEFC Council provides mutual recognition of national forest certification schemes and defines an international chain of custody standard (PEFC ST 2002:2010) and rules for the usage of the PEFC Logo (PEFC ST 2001:2008). The PEFC Belgium requires that chain of custody certification shall be carried out by certification bodies who are accredited by accreditation bodies that are signatories of the Multilateral Recognition Arrangement (MLA) for product certification of IAF or IAF's regional group such as European co-operation for Accreditation (EA).

Accreditation reduces the risk for businesses and their customers by assuring that accredited certification bodies are competent to carry out the work they undertake. Accreditation bodies that are members of IAF are required to operate to the highest standard and to require the certification bodies they accredit to comply with appropriate international standards and IAF Guidance to the application of those standards.

Accreditations granted by IAF accreditation body members, based on regular peer evaluations to assure the equivalence of their accreditation programs, allow companies with an accredited conformity assessment certificate in one part of the world to have that certificate recognised everywhere else in the world.

Introduction

1. The PEFC Council requires the certification bodies operating chain of custody certification to meet the requirements of ISO/IEC Guide 65, IAF Guidance on the Application of ISO/IEC Guide 65 (IAF GD5), this IAF / PEFC document and the relevant provisions of ISO 19011 specified in this document.
2. ISO/IEC Guide 65 is an International Standard that sets out criteria for bodies operating certification of products, services and processes. The chain of custody certification is considered as a process certification whereby the chain of custody is a set of interrelated or interacting activities that transforms input information on the origin of procured raw material into output information on the origin of sold / transferred products. The requirements for the chain of custody are described in PEFC ST 2002:2010 and rules for the usage of the PEFC Logo are described in PEFC ST 2001:2008 of the PEFC Council Technical Document.
3. The term “shall” is used throughout this document to indicate those provisions that, reflecting the requirements of ISO/IEC Guide 65 and requirements specific for PEFC chain of custody certification, are mandatory. The term “should” is used to indicate guidance that, although not mandatory, is provided by IAF and the PEFC Council as a recognised means of meeting the requirements.
4. This document does not include the text of ISO/IEC Guide 65, IAF GD5 and ISO 19011. These documents can be obtained from ISO, national standard organisations or the IAF.

1. Scope

This document provides additional scheme specific requirements for certification bodies operating chain of custody certification against PEFC ST 2002:2010.

2. Normative references

ISO/IEC 17000:2004 Conformity assessment – Vocabulary and general principles

ISO/IEC Guide 65:1996 General Requirements for bodies operating product certification systems

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

ISO 19011:2002, Guidelines for quality and/or environmental management systems auditing

IAF GD 5:2006, IAF Guidance on the Application of ISO/IEC Guide 65:1996 (*available from www.iaf.nu*)

PEFC ST 2002:2010, Chain of Custody of Forest Based Products – Requirements (hereinafter the chain of custody standard), (*available from www.pefc.org*)

PEFC ST 2001:2008, version 2, PEFC Logo Usage Rules - Requirements (hereinafter PEFC Logo usage rules), (*available from www.pefc.org*)

3. Definitions

For the purposes of this document, the relevant definitions given in ISO/IEC 17000:2004, ISO/IEC Guide 65, IAF GD5 and the chain of custody standard apply.

3.1. Chain of custody standard

PEFC ST 2002:2010: Chain of Custody of Forest Based Products – Requirements.

3.2. Client organisation

Organisation, including a multi-site organisation, that is applying for or whose chain of custody has been certified.

Note: The term “client organisation” used in this document is equivalent to the term “supplier” used in ISO/IEC Guide 65.

3.3. Major nonconformity

The absence of, or failure to implement and maintain, one or more requirements of the chain of custody standard, that may result in a systemic risk to the function and effectiveness of the chain of custody and/or effects confidence in the client organisation’s claims on certified raw material.

Note: A major nonconformity may be an individual nonconformity or a number of minor but related nonconformities, that when considered in total are judged to constitute a major nonconformity.

3.4. Minor nonconformity

A single failure to fulfil the requirements of the chain of custody standard that may result in no systemic risk to the function and effectiveness of the chain of custody and/or effects confidence in the supplier’s claims on certified raw material.

3.5. Observation

An evaluation finding that does not warrant nonconformity but is identified by the audit team as an opportunity for improvement.

4. Certification body

All the requirements given in clause 4 of ISO/IEC Guide 65 and IAF GD5 apply.

4.1. General provisions

PEFC certification will be carried out by impartial, independent third parties that are not involved in the standards setting process as governing or decision-making bodies, or in forest management, and that are independent of the certified entity.

The criteria against which the client organisation's chain of custody is evaluated are those outlined in latest version of the chain of custody standard and relevant mandatory appendices and PEFC logo usage rules.

Note: The latest version of the chain of custody standard, its amendments and corresponding transition period are available from the PEFC Council official website www.pefc.org.

4.2. Confidentiality

The certification body shall inform the client organisation that it is obliged to provide information to the PEFC Council or a PEFC National Governing Body. In order to comply with the ISO/IEC Guide 65 and IAF GD5 requirements for confidentiality, the certification body shall have the written consent of the client organisation for the information disclosed to the PEFC council or the PEFC National Governing Body.

5. Certification body personnel

All the requirements given in clause 5 of ISO/IEC Guide 65 and IAF GD5 apply.

5.1. Personnel involved in the certification activities

5.1.1. The certification body shall ensure that all personnel carrying out the key activities, such as contract review, auditing, granting of certification, monitoring of auditors, etc. have the relevant and appropriate knowledge and competencies corresponding to these activities.

5.2. Auditors

The certification body shall have a documented process to ensure that auditors have personal attributes, knowledge and skills in accordance with clauses 7.1, 7.2, 7.3.1 and 7.3.2 of ISO 19011.

5.2.1. Education

The certification body shall ensure that auditors have the knowledge corresponding to at least a secondary education that includes or is supplemented with courses related to forest based and related industries where the auditor(s) conducts chain of custody audits.

Note: Secondary education is that part of the national education system that comes after the primary or elementary stage, but that is completed prior to entrance to the tertiary, i.e. university or similar educational institution.

The specific education relating to forest based and related industries can be substituted by working experience in these sectors if the certification body can demonstrate it is equivalent to the required education.

Note: Forest based and related industries include activities relating to manufacturing, transport, distribution or transport and storage of forest based products.

5.2.2. Chain of custody training.

The certification body shall ensure that auditors, in the last two years, have participated in an education programme in chain of custody of forest based products that is recognised by the PEFC Council or a PEFC National Governing Body.

5.2.3. Audit training

The certification body shall ensure that auditors have successfully completed training in audit techniques based on ISO 19011.

5.2.4. Working experience

For a first qualification of an auditor, the certification body shall ensure that the auditor has a minimum of three (3) years full time experience in the forest based and related industries.

The number of years of total work experience may be reduced by one (1) year, if the auditor has completed a tertiary education appropriate and relevant to forest based and related industries.

Note: Tertiary education, also referred to as third stage, third level, and post-secondary education, is the educational level following the completion of a school providing a secondary education.

5.2.5. Audit experience

For a first qualification of an auditor, the certification body shall ensure that the auditor within the last three years has performed chain of custody audits for at least four organisations under the leadership of a qualified auditor. The number of chain of custody audits in training can be reduced by two (2) audits for auditors that are qualified for ISO 9001 or 14001 auditing in the sector of forest based and related industries.

For maintaining the qualification of the auditor, the certification body shall ensure that the auditor has performed a minimum of five (5) external audits per year including at least two (2) chain of custody audits where the sum of these audits should cover at least seven (7) man-day of audit work.

5.2.6. Competencies

5.2.6.1. The certification body shall ensure that auditors demonstrate ability to apply knowledge and skills in the following areas:

- a) audit principles, procedures and techniques (see 7.3.1a of ISO 19011): to enable the auditor to apply those appropriate to different audits and ensure that audits are conducted in a consistent and systematic manner.
- b) organisation situations (see 7.3.1c of ISO 19011), including organizational size, structure, functions and relationships, general business processes and related terminology and cultural and social customs such as knowledge of the client organisation working language: to enable the auditor to comprehend the organisation's operational context.
- c) applicable international legislation and country specific forest governance and law enforcement system relevant to forest based raw material procurement and avoidance of raw material from controversial sources: to enable the auditor to comprehend the client organisation's contractual relationships with suppliers and

evaluate the client organisation's procedures for avoidance of raw material from controversial sources. Knowledge and understanding of this area shall cover:

- contracts and agreements,
- forest governance and law enforcement system of countries of the uncertified raw material origin,
- international treaties and conventions relating to forest products trade (CITES).

5.2.6.2. The certification body shall ensure that auditors demonstrate ability to apply terminology, knowledge, understanding and skills in the following areas of the chain of custody of forest based products:

- a) principles and requirements of the chain of custody standard,
- b) products, processes and practices in the specific sector, applied raw material flow, measurements and control measures,
- c) the application of management systems to forest based and related industries and interaction between their components,
- d) information systems and technology for, authorisation , security, distribution and control of documents, data and records,
- e) application of PEFC and other product labels and claims, and
- f) application of the measures to avoid procurement of raw material from controversial sources, including the relevant risk assessment methodology and indicators.

5.2.6.3. The certification body shall provide evidence of annual monitoring of chain of custody auditors applying methods such as audit witnessing, reviewing audit reports or client organisations' feedback, etc based on the frequency of their usage and the level of risk linked to their activities. In particular, the certification body shall review the competence of its personnel in the light of their performance in order to identify training needs.

5.3. Audit Team

The audit team shall be comprised of by auditor(s) fulfilling the requirements defined in 5.2. In some cases technical experts may be required to support the required auditor competency in a particular technical area by providing appropriate technical expertise.

6. Changes in the certification requirements

All the requirements given in clause 6 of ISO/IEC Guide 65 apply.

7. Appeal complaints and disputes

All the requirements given in clause 7 of ISO/IEC Guide 65 and IAF GD5 apply.

8. Certification Application

All the requirements given in clause 8 of ISO/IEC Guide 65 apply

- 8.1. The client organisation, as a minimum, shall provide the following information as a part of the application for chain of custody certification:
- a) corporate entity, name, address and legal status,
 - b) chain of custody documented procedures of the client organisation as defined in clause 4.3 of the chain of custody standard,
 - c) descriptive identification of the products covered by the chain of custody, and
 - d) sites covered by the chain of custody in the case of multi-site certification (Appendix 4 of the chain of custody standard).
- 8.2. The client organisation, as a minimum, shall provide for products covered by the chain of custody, the following information relating to the application of the optional requirements of the chain of custody standard:
- a) chain of custody method (chapter 4 and 5)
 - b) method of calculation of the certification percentage (clause 5.3.4)
 - c) transfer of certification percentage to output products (clause 5.4)
 - d) applied definition of the origin (Appendix 1), and
 - e) intended application of the PEFC Logo usage rules.
- 8.3. Where the client organisation is using different chain of custody methods (a-e) for various products or at various sites, in case of multisite organisation, the application shall include information specified under a) to e) separately for each product and/or site.

9. Preparation for evaluation

All the requirements given in clause 9 of ISO/IEC Guide 65 and IAF GD5 apply.

- 9.1. The certification body shall have documented procedures to ensure that an audit plan is established for each audit to provide basis for agreement regarding the conduct and scheduling of the audit activities. The audit plan shall be communicated and the dates of the audit shall be agreed upon, in advance with the client organisation.

Note: Guidance for preparing the audit plan is provided by ISO 19011, clause 6.4.1.

- 9.2. In the case of multisite certification, the audit plan shall list the sites to be sampled.

- 9.3. The certification body shall have documented procedures for selecting and appointing the audit team, including audit team leader.

Note: Guidance for selecting the audit team and audit team leader is provided by ISO 19011, clauses 6.2.1 and 6.2.4.

- 9.4. The certification body should carry out review of the client organisation's documentation (see 8.1 b) prior to the on-site audit to determine the conformity of the chain of custody documentation with the audit criteria according to clause 6.3 of ISO 19011.

10. Evaluation

All the requirements given in clause 10 of ISO/IEC Guide 65 apply.

10.1. General requirements

10.1.1. The scope of the chain of custody audit is:

- a) to determine the conformity of the client organisation's chain of custody process with the requirements of the chain of custody standard and the relevant Appendix with the definition of the raw material origin and its effective implementation;
- b) to determine the conformity of the client organisation's management system with the requirements of the chain of custody standard its effective implementation;
- c) to determine the conformity of the client organisation's chain of custody process with requirements for the avoidance of raw material from controversial sources where applicable (Appendix 2 to the chain of custody standard) and its effective implementation;
- d) to determine the conformity of the client organisation with the PEFC logo usage rules and its effective implementation; and

Note: The usage of the PEFC Logo and PEFC claims is to be evaluated at the time of the surveillance and re-certification audits.
- e) to identify areas for potential improvement of the client organisation's chain of custody.

10.1.2. The certification body shall conduct the initial audit of a chain of custody following the relevant guidance provided in ISO 19011, clause 6.5. The initial audit and re-certification audits shall be conducted on-site.

10.2. Duration of initial audits

10.2.1. The certification body shall have documented procedures for determining audit time, and for each client organisation the certification body shall determine, with input from the auditor and / or technical expert, the time needed to plan and accomplish a complete and effective audit of the client organisation's chain of custody. The audit time determined by the certification body, and the justification for the determination, shall be recorded. The minimum time for the on-site audit is one half of a man day with the exemption to micro enterprises.

Note: Micro enterprises are defined as having fewer than 10 employees and annual turnover or global balance less than 2 million EUR, or equivalent in the national currency.

10.2.2. In determining the audit time, the certification body should consider among other things, the following aspects:

- a) the requirements of the chain of custody standard,
- b) size and complexity of the client organisation's operation, number of product types and product lines covered by the production batch(es) and their unity,
- c) extent of supplies that could create a high risk of procurement of raw material from controversial sources,

- d) extent of PEFC Logo labelling activities,
- e) any outsourcing of any activities included in the scope of the chain of custody standard,
- f) the results of any prior audits, including those of client organisation's management systems,
- g) number of sites and multi-site considerations.

11. Evaluation report

All the requirements given in clause 11 of ISO/IEC Guide 65 and clauses 6.6.1 and 6.6.2 of ISO 19011 apply.

- 11.1. The evaluation report shall identify the parts of the client organisation's organisation, processes and product groups and their products covered by the chain of custody.
- 11.2. The evaluation report shall define the applied certification criteria; i.e. the chain of custody standard and its parts that are applicable to the client organisation's chain of custody, including:
 - a) chain of custody method (chapter 4 and 5 of the chain of custody standard),
 - b) method of calculation of the certification percentage (clause 5.3.4 of the chain of custody standard),
 - c) transfer of certification percentage to output products (chapter 5.4 of the chain of custody standard),
 - d) applied definition of the origin (Appendix 1 of the chain of custody standard),
 - e) the PEFC logo usage rules, and
 - f) requirements for avoidance of raw material from controversial sources (Appendix 2 of the chain of custody standard).
- 11.3. If the certification criteria differ for individual products/product groups, the definition described in 11.2 shall be made separately for each product/product group.

12. Decision on certification

All the requirements given in clause 12 of ISO/IEC Guide 65 and IAF GD5 apply.

12.1. Nonconformities

- 12.1.1. Audit findings shall be classified as major nonconformities, minor nonconformities and observations.
- 12.1.2. Major and minor nonconformities shall be corrected and the corrective action(s) verified by the certification body before granting a certification and recertification.
- 12.1.3. Major and minor nonconformities identified in the surveillance audits shall result in corrective action(s) by the client organisation resolving the nonconformities. The corrective action plan, including a timeframe shall be reviewed and accepted by the certification body. The time period for completion of the corrective action(s) for major nonconformities identified in surveillance audits and their verification by the certification body shall follow the rules of the certification body but not exceed 3

months. Corrective action(s) for minor nonconformities shall be verified no later than during the next audit.

- 12.1.4. Corrective action(s) for all nonconformities identified in initial, surveillance and re-certification audits shall be verified by the certification body by site visit or other appropriate forms of verification.

12.2. Certification document

- 12.2.1. The certification document shall include at least the following information:

- a) identification of the certification body,
- b) name and address of the client organisation or its parts whose chain of custody is subject to certification,
- c) scope of the certification granted (see 12.2.2),
- d) accreditation mark as prescribed by the accreditation body (including accreditation number where applicable), and the date of granting, extending or renewing certification and the expiry date or recertification due date (see 12.2.6). The effective date on a certification document shall not be before the date of the certification decision, and

- 12.2.2. The scope of certification shall include at least the following information:

- a) chain of custody standard identification,
- b) applied chain of custody method,
- c) applied definition of the raw material origin (Appendix 1 of the custody of standard), and
- d) products covered by the chain of custody.

- 12.2.3. Where national identification of the chain of custody standard differs from the international one, the chain of custody certificate shall always, in addition to the national identification, include the international identification, i.e. PEFC ST 2002:2010, Chain of Custody of Forest Based Products – Requirements.

Note: The identification of the chain of custody standard shall refer to the version of the chain of custody standard against which the evaluation was carried out and which was valid at the time when the certification was granted. In order to avoid the necessity to issue a new certification document every time the chain of custody standard is amended, the identification of the chain of custody standard should include a statement “as amended” with the reference to the PEFC Council website (www.pefc.org) where the amendments to the valid version of the chain of custody standard are presented.

- 12.2.4. Where different definitions of the raw material origin have been applied for individual products/product groups, the scope of the certification document (12.2.2 b) shall be identified for individual products. Where the scope of the certification is included in an appendix to the certificate, the certificate shall include a reference to the appendix as an integral part of it.

- 12.2.5. Based on a client organisation’s request, the certification body shall issue the certification document in an internationally common language - or at least in English.

12.2.6. The certification shall be granted for a maximum of 5 years.

12.2.7. The certification body shall make information on the validity and scope of any issued certification document publicly available.

Note: Certification body's website is an appropriate and recognised mean of making the information publicly available.

12.2.8. Certification bodies shall immediately inform the relevant PEFC National Governing Body or the PEFC Council where the PEFC National Governing Body does not exist, when certification is granted, suspended, withdrawn, or its scope is changed.

13. Surveillance

All the requirements given in clause 13 of ISO/IEC Guide 65 and IAF GD5 apply.

13.1. Audit requirements

13.1.1. The surveillance audits shall be carried out at least annually.

13.1.2. The surveillance shall be carried out at the client organisation's site. The annual on-site surveillance audit at the client organisation's premises can be replaced by other audit techniques, such as documentation and records review and the period between on-site surveillance audits shall not exceed two (2) years where:

- a) the certification body can demonstrate that audit techniques used deliver sufficient confidence in the certified entity's compliance with the certification criteria,
- b) the client organisation is a micro enterprise,
- c) no nonconformity was raised during the previous initial, surveillance or re-certification audit,
- d) the client organisation procurement does not include high risk supplies, and
- e) the client organisation provides the certification body with all the individual records required to be kept by the chain of custody standard or a list of all the records which allow the certification body to establish an independent sampling.

13.1.3. The on-site surveillance audit can also be avoided and replaced by other audit technique where the submitted records provide sufficient evidence that the client organisation has not procured and has not made claims on certified raw material since the last certification, surveillance or re-certification audit. The period between the on-site surveillance audits shall however not exceed two (2) years.

13.1.4. The minimum time for the surveillance and re-certification audit is the same as for the initial audit defined in 10.2.1 and 10.2.2.

14. Usage of licences, certificates and marks of conformity

All the requirements given in clause 14 of ISO/IEC Guide 65 and IAF GD5 apply.

14.1. Use of PEFC Logo

14.1.1. Where the certification body makes use of the PEFC Logo on the certification document or for any other purposes linked to the PEFC certification scheme, the use shall only be carried out based on a valid licence issued by the PEFC Council or the relevant PEFC National Governing Body.

14.1.2. Where the certification body makes use of the PEFC Logo on the certification document, it shall make clear to the client organisation that the PEFC Logo on the certificate only refers to the client organisation's compliance with the PEFC certification scheme and does not provide the client organisation with the right to use the PEFC Logo.

Note: The client organisation with a valid PEFC chain of custody certificate can only use the PEFC Logo with a unique PEFC licence logo number for "on-product" as well as "off-product" purposes based on PEFC Logo usage licence contract issued by the PEFC Council or another entity authorised by the PEFC Council and in accordance with the PEFC logo usage rules.

15. Complaints to suppliers

All the requirements given in clause 15 of ISO/IEC Guide 65 apply.

Annex 1 – Accreditations accepted by the PEFC Council

Chain of custody certification shall be carried out by certification bodies who are accredited by accreditation bodies that are signatories of the Multilateral Recognition Arrangement (MLA) for product certification of IAF or IAF's Regional Accreditation Groups such as European co-operation for Accreditation (EA), Interamerican Accreditation Cooperation (IAAC), Pacific Accreditation Cooperation (PAC) and Southern African Development Community in Accreditation (SADCA).

The scope of the accreditation shall explicitly cover the PEFC chain of custody standard ((PEFC ST 2002:2010, Chain of Custody of Forest Based Products – Requirements) in its valid version and/or with reference to any future changes and amendments adopted by the PEFC Council and presented at the PEFC Council official website www.pefc.org.

The scope of accreditation shall also explicitly state ISO/IEC Guide 65, this document and other requirements against which the certification body has been assessed.

Annex 2 – PEFC notification of certification bodies

(Requirements are not applicable to the accreditation of the certification body)

Certification bodies issuing certificates of sustainable management in accordance with the Belgian Forest Certification Scheme must be notified by the PEFC Belgium.

To ensure the independence of certification bodies, the conditions of notification decided on by the PEFC Belgium only cover the following aspects:

1. Administrative conditions:
 - The certification body agrees to attend information meetings dedicated to certification bodies organised by the PEFC Belgium (maximum three a year).
 - The certification body informs the PEFC Belgium of all Chain of Custody certificates issued and changes concerning validity and scope of these certificates.
2. Financial conditions
3. The certification body undertakes to comply with the certification requirements laid down in the BFCS through its accreditation, as described in PEFC B 2003:2012.

Procedures for PEFC notification of certification bodies are non-discriminatory and don't lead to any trade-barriers.

Annex 3 – Multi-site chain of custody certification

(Appendix 3 to the chain of custody standard)

o. Introduction

0.1. This annex is for the audit and certification of chain of custody in client organisations with a network of sites to ensure that the audit provides adequate confidence in the conformity of the client organisation's chain of custody with the chain of custody standard across all sites listed and that the audit is both practical and feasible in both economic and operative terms.

1. Eligibility criteria for the multi-site client organisation

1.0.1. Eligibility criteria for the multi-site client organisation, including definitions, are included in Appendix 3 to the chain of custody standard.

1.0.2. In addition to requirements of Appendix 3 to the chain of custody standard, the multi-site client organisation should demonstrate its ability to collect and analyse data (including but not limited to items bellow) from all sites including the central office and its authority over all sites and also demonstrate its authority to initiate change if required:

- a) chain of custody documentation and chain of custody changes,
- b) management review,
- c) complaints,
- d) evaluation of corrective actions,
- e) internal audit planning and evaluation of the results,
- f) different legal requirements in relation to the avoidance of raw material from controversial sources.

1.0.3. With reference to Appendix 3 of the chain of custody standard, a multi-site client organisation, which is established as a group of independent legal entities only for the purpose of obtaining and maintaining chain of custody certification, shall only consist of typically small enterprises.

2. Eligibility criteria for the certification body

2.0.1. The certification body shall provide information to the client organisation about the eligibility criteria laid down herein and in Appendix 3 to the chain of custody standard before starting the evaluation process, and should not proceed with the evaluation if any of the eligibility criteria for the multi-site organisation are not met. Before starting the evaluation process, the certification body should inform the client organisation that the certificate will not be issued if during the audit nonconformities in relation to these eligibility criteria are found.

2.1. Contract Review

- 2.1.1. The certification body's procedures shall ensure that the initial contract review identifies the complexity and scale of the activities covered by the chain of custody subject to certification and any differences between sites as the basis for determining the level of sampling.
- 2.1.2. The certification body shall identify the central function of the client organisation that is its contractual partner for the performance of the certification. The agreement shall allow the certification body to carry out the certification activities at all sites of the multi-site client organisation.
- 2.1.3. The certification body shall analyse, in each individual case, to what extent sites of an organisation have similar raw material flow that enables to implement the chain of custody to be applied in a similar manner. The similarity of the sites included in the multi-site client organisation shall be taken into consideration when applying the sampling procedures.
- 2.1.4. The certification body shall retain a record to demonstrate that the required activities in 2.1.1, 2.1.2 and 2.1.3 have been implemented.

2.2. Audit

- 2.2.1. The certification body shall have documented procedures to deal with audits under its multi-site procedure. Such audit procedures, including documentation and records review, on-site audits, etc, shall establish the way the certification body satisfies itself, inter alia, that the chain of custody requirements are actually applied to all the sites and that all the criteria in the chain of custody standard, including its Appendix 3 are met.
- 2.2.2. If more than one audit team is involved in the evaluation/surveillance of the network, the certification body shall designate a unique audit leader whose responsibility is to consolidate the findings from all the audit teams and to produce a synthesis report.

2.3. Nonconformities

- 2.3.1. When nonconformities are found at any individual site, either through the client organisation's internal auditing or from auditing by the certification body, an investigation shall take place to determine whether the other sites may be affected. Therefore, the certification body shall require the client organisation to review the nonconformities to determine whether they indicate an overall chain of custody deficiency applicable to all sites or not. If they are found to do so, corrective action should be performed both at the central office and at the individual sites. If they are found not to do so, the client organisation shall be able to demonstrate to the certification body the justification for limiting its follow-up action.

- 2.3.2. The certification body shall require evidence of these actions and increase its sampling frequency until it is satisfied that control is re-established.
- 2.3.3. At the time of the decision making process, if any site has a nonconformity, certification shall be denied to the whole multi-site client organisation pending satisfactory corrective action.
- 2.3.4. It shall not be admissible that, in order to overcome the obstacle raised by the existence of a nonconformity at a single site, the client organisation seeks to exclude from the scope the "problematic" site during the certification process.

2.4. Certificates

- 2.4.1. One single certificate shall be issued with the name and address of the central office of the client organisation. A list of all the sites to that the certificate relates shall be issued, either on the certificate itself or in an appendix or as otherwise referred to in the certificate. The scope or other reference on the certificate shall make clear that the certified activities are performed by the network of sites in the list.

If the individual sites are applying different chain of custody methods or definitions of the raw material origin, the application of the chain of custody standard shall be clearly stated in the certificate and any appendix for the individual sites.

- 2.4.2. A sub-certificate may be issued to the organization for each site covered by the certification on condition that it contains the same scope, or a sub-scope of that scope, and includes a clear reference to the main certificate.
- 2.4.3. The certificate will be withdrawn in its entirety, if the central office or any of the sites does not/does not fulfil the necessary criteria for the maintaining of the certificate (see 2.2 above).
- 2.4.4. The list of sites shall be kept updated by the certification body. To this effect, the certification body shall request the organization to inform it about the closure, establishment, or change in activities of sites. Failure to provide such information will be considered by the certification body as a misuse of the certificate, and it will act consequently according to its procedures.
- 2.4.5. Additional sites can be added to an existing certificate as the result of surveillance/ reassessment activities. The certification body shall have a procedure for the addition of new sites.

Note: Temporary sites such as building sites set up by an client organisation in order to perform specific works are not to be treated as part of a multi-site operation. Any sampling of the activities performed at such sites will be for the purpose of confirming the activities of the permanent office whose chain of custody is subject to certification, not for the purpose of granting certificates to the temporary sites themselves.

3. Sampling for on-site audits

3.1. Methodology

- 3.1.1. The certification body can apply sampling of sites for on-site audits where the site sampling is appropriate to gain sufficient confidence in the compliance of the multi-site client organisation with the chain of custody requirements. The certification body shall be able to demonstrate its justification for the selection of sites for the on-site audits to ensure that all differences across the sites and implementation of chain of custody have been assessed.
- 3.1.2. The sample for the initial, surveillance as well as re-certification audits shall be determined separately for sites using different chain of custody methods (physical separation and percentage based methods). The sample shall be representative concerning differences in sites' processes and activities which are subject to the chain of custody certification.
- 3.1.3. The sample should be partly selective based on the factors set out below and partly non selective, and should result in a range of different sites being selected, without excluding the random element of sampling.
- 3.1.4. At least 25% of the sample should be selected at random.
- 3.1.5. Taking into account the criteria mentioned hereafter, the remainder of the sample should be selected so that the differences among the sites selected over the period of validity of the certificate is as large as possible.
- 3.1.6. The site selection criteria shall include among others the following aspects:
 - a) Results of internal audits or previous certification audits,
 - b) Records of complaints and other relevant aspects of corrective and preventive action,
 - c) Significant variations in the size of the sites and in production processes of the sites,
 - d) Variations in the applied chain of custody methods,
 - e) Modifications since the last certification audit,
 - f) Geographical dispersion.

- 3.1.7. This selection does not have to be done at the start of the evaluation process. It can also be done once the audit at the central office has been completed. In any case, the central office shall be informed of the sites to be part of the sample. This can be on relatively short notice, but should allow adequate time for preparation for the audit.
- 3.1.8. The central office shall be examined during every initial, surveillance and re-certification audit as a part of the sample.

3.2. Size of sample

3.2.1. The certification body shall have documented procedures for determining the sample to be taken when auditing sites as part of the evaluation and certification of a multi-site client organization. This should take into account all the factors described in this annex.

3.2.2. In the event that application of the certification body's procedure results in a smaller sample than would result from the application of the guidance set out below, the certification body shall record the reasons justifying this and demonstrate that it is operating in accordance with its approved procedure.

3.2.3. The following requirements are based on the example of a low to medium risk activity with less than 50 employees at each site. The minimum number of sites to be visited per audit is:

Initial audit: the size of the sample should be the square root of the number of remote sites:

$(y=\sqrt{x})$, rounded to the upper whole number.

Surveillance audit: the size of the annual sample should be the square root of the number of remote sites with 0.6 as a coefficient ($y=0.6 \sqrt{x}$), rounded to the upper whole number.

Re-certification audit: the size of the sample should be the same as for an initial audit. Nevertheless, where the chain of custody system has proved to be effective over a period of three years, the size of the sample could be reduced by a factor 0.8, i.e.: ($y=0.8 \sqrt{x}$), rounded to the upper whole number.

3.2.4. The size of sample should be increased where the certification body's risk analysis of the activity covered by the quality management system subject to certification indicates special circumstances in respect of factors like:

- a) The size of the sites and number of employees;
- b) The complexity and variations of raw material flow and chain of custody methods;
- c) Variations in the application of chain of custody methods and definitions of the raw material origin;
- d) Level of risk of procurement of raw material from controversial sources;

- e) Records of complaints and other relevant aspects of corrective and preventive action;
- f) Any multinational aspects;
- g) Results of internal audits.

3.3. Audit Times

- 3.3.1. The certification body shall be able to demonstrate its justification for the time spent on multi-site audits in terms of its overall policy for allocation of audit time.
- 3.3.2. The minimum audit time to spend for each individual site as a part of the initial, surveillance and re-certification audits is the same as for the initial audit defined in clause 10.2.1. Reductions can be applied to take into account the clauses of the chain of custody standard that are not relevant to sites and are only examined at the central office.
- 3.3.3. No reduction is permitted for the central office.

3.4. Additional Sites

- 3.4.1. On the application of a new group of sites to join an already certified multi-site network, each new group of sites should be considered as an independent set for the determination of the sample size. After inclusion of the new group in the certificate, the new sites should be combined with the previous ones for determining the sample size for future surveillance visits or reassessment audits.