

**SPECIFIC REGULATIONS FOR
AENOR CHAIN OF CUSTODY CERTIFICATION
IN ACCORDANCE WITH
FSC® PROCEDURES**

RP B45.01

(Rev. 07)

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1. OBJECTIVE

According to section 3.2 of the General Regulations for Certificates of Conformity (hereinafter General Regulations), these regulations describe the specific evaluation system to ensure AENOR's compliance with the FSC® Chain of Custody (hereinafter CoC) standards for forest products.

2. REFERENCE DOCUMENTS

- FSC-STD-20-001 General requirements for FSC accredited certification bodies
- FSC-STD-20-011 Chain of Custody evaluations.
- FSC-STD-40-003 Chain of Custody certification for multiple sites.
- FSC-STD-40-004 FSC standards for CoC certification.
- FSC-DIR-40-004 Directive on CoC certification.
- FSC-STD-40-004a Addendum to FSC-STD-40-004: FSC product classification.
- FSC-STD-40-005 FSC Standard for evaluating controlled wood companies.
- FSC-DIR-40-005 FSC Directive on FSC controlled wood.
- FSC-STD-40-006 FSC CoC Standard for project certification.
- FSC-STD-40-007 FSC Standard for sourcing reclaimed material for use in FSC product groups or certified projects.
- FSC-STD-50-001 Requirements for use of FSC trademarks by certificate holders.

The current editions of the aforementioned standards and other applicable standards can be found at www.fsc.org.

Also FSC frequently publishes Advice Notes that complement the established requirements for FSC standards and procedures. Generally the Advice Notes are grouped together in directives that are published later on. These Advice Notes are applicable from their date of publication (unless the contrary is indicated) and can be viewed at www.fsc.org.

3. SCOPE

This document is applicable to the activities carried out by AENOR to perform CoC evaluation according to the FSC system.

AENOR can outsource a part of the process to competent personnel previously recognized by AENOR. These activities will only be conducted within the geographical scope accredited by ASI.

AENOR will provide the clients with the information on the outsourced activities, when applicable.

Decision making will never be outsourced.

4. MANAGEMENT BODY

AENOR's Statutes and General Regulations entrust the management of this particular certification to AENOR technical services.

As required by the interested parties, AENOR will provide the names of its members involved in the decision-making, complaints resolution, impartiality review and policy implementation stages of the certification process.

5. CERTIFICATE ISSUANCE

FSC standards cover three different types of CoC certification: individual certification, group certification and multisite certification.

These two last are regulated by what is established in FSC-STD-40-003 Chain of Custody certification for multiple sites.

5.1. Applying for FSC CoC certification

The applicant for CoC certification will inform AENOR of the reference standards it has adopted for implementing its CoC system, including:

- FSC-STD-40-003 Chain of Custody certification for multiple sites.
- FSC-STD-40-004 FSC Standard for the CoC certification.
- FSC-STD-40-005 FSC Standard for evaluating controlled wood companies.

- FSC-STD-40-006 FSC CoC Standard for project certification.
- FSC-STD-40-007 Standard for sourcing reclaimed material for FSC product groups or FSC certified projects.

The applicant for CoC certification will complete the application form in the FSC Chain of Custody section, or will provide the technical services of AENOR with this required information through any other form of communication (email, phone, etc.).

5.2. Reception and processing of application

Once the application is received, it will be processed by AENOR's technical certification services.

The technical services will define the length of audits and assigned visits, along with the necessary number of overall and on-site days.

The technical services will also designate the members of the auditing team, who will meet the qualification requirements established in the document FSC-STD-20-001, and AENOR's specific procedures and instructions.

Once the offer is prepared, it will be sent to the client. Acceptance of the offer implies acceptance of all the conditions set forth therein and is for all intents and purposes a contractual document between the signatories. The applicant must also sign the License Agreement (provided by AENOR beforehand), in order to initiate the certification process.

Once the offer is accepted and the License Agreement is signed, AENOR will include the client in the FSC database, indicating their status as 'Applicant'. This information is confidential until certification is granted.

5.3. Initial audit

The audit will consist of one stage, unless requested otherwise by the client.

If the client requests so, a desk study or advance visit can be performed, with the aim of verifying the viability of certification prior to the initial audit.

In multisite or group cases, audits will be done by sampling, in agreement with FSC standards and AENOR's own specific related procedures.

5.3.1. Audit planing

The lead auditor will agree with the applicant company on dates and locations for the audit, taking its duration into account, and will plan the audit following AENOR's internal procedures.

The technical services of AENOR will send the applicant an audit plan at least fifteen days before the beginning of the audit.

5.3.2. Audit and audit report

As indicated in the audit plan, the auditing team will evaluate compliance with all applicable requirements established in FSC standards.

After performing the initial audit, an audit report and an evaluation report will be written following FSC-STD-20-011 standards and AENOR's specific procedures and instructions.

In the case that there are any non conformities, the audited applicant will have a period of 30 calendar days to provide AENOR with a Corrective Action Plan (CAP) that resolves these issues.

Minor non conformities must be resolved within a year (in exceptional cases, two years).

Major non conformities must be resolved within three months (in exceptional cases, six months).

5.4. Evaluation and decision-making on certification

The initial audit report and CAP, if necessary, will be evaluated by AENOR. For certification to be granted, the corrective actions must sufficiently resolve the non conformities detected and must be properly implemented.

FSC certification will not be issued in the following cases:

- There is a major non conformity that has not been resolved.
- The organisation does not possess a valid and updated FSC license agreement.

The results of the main evaluation are valid for a maximum period of six months. Within this period a certification decision should be taken, provided that AENOR has all the

information needed for the decision. Otherwise the results of the mail evaluation are considered out of date and a new on site main evaluation shall be conducted.

AENOR may decide to issue or deny certification and may carry out a special audit (before or after certification) in order to confirm the implementation of corrective actions.

Decision making will never be outsourced.

The services of AENOR will send a letter to the applicant on the decision taken regarding their application, along with reasons for the decision.

5.5. Issuance of CoC certification and FSC license

Once granting has been approved, AENOR will send the applicant their FSC CoC certificate. When issuing the certificate, AENOR will also include the information regarding the certification in the FSC database. From that moment on, this information will be published on the FSC website, which can be accessed at <http://info.fsc.org/>.

FSC CoC certificates are valid for five years, except in the case of specific projects, in which they are valid for the term of the project.

After issuing the CoC certificate, AENOR will provide titleholders with an access code for the FSC website, where they can download FSC logos and check graphic requirements, requirements for product labels and digital versions of the FSC logos, together with the company's certification code. Access to the website has additional maintenance charges from the FSC, which AENOR will collect in their name.

Once the certificate is issued, the company will be able to mention its certified products through different channels (sales catalogues, advertising, etc.).

In no case does the certificate exempt the corresponding company from any guarantees or liabilities it has under current legislation.

The certificate guarantees compliance with FSC standards for the previously defined scope and products, which is indicated on the certificate itself. The certificate, or any other document obtained during the certification process, may not be used for other purposes than those for which they were intended, including falsification or unauthorised use.

In agreement with the specific FSC requirements, the client cannot file complaints (of conformity or non-conformity) with regard to FSC requirements until the moment the certificate is issued.

6. MAINTAINING CERTIFICATE

As a requirement to maintain the certificate, companies applying for a specific FSC standard certification must demonstrate compliance at the time of validation. This will be checked by a corresponding surveillance audit.

6.1. Surveillance audits

While the certificate is valid (five years), AENOR services will annually carry out surveillance audits on the applicant with the same scope and system used in the initial audit, with the aim of checking that the conditions permitting certification are still met.

Surveillance audits will be conducted at least once per calendar year, but no later than 15 months after the last evaluation. However, surveillance evaluations may be more frequent depending on the factors described in FSC-STD-20-001.

In the case that there are non conformities, the audited company will have a period of 30 calendar days to provide AENOR with a CAP to resolve the issues.

For minor non conformities, there is a deadline of one year (in exceptional cases, two years). For major non conformities, there is a deadline of three months (in exceptional cases, six months).

6.2. Evaluation and decisions on maintenance

The surveillance audit report and corresponding corrective actions will be evaluated by AENOR. They can decide to maintain certification or call for a special audit to check the implementation of corrective actions, along with any of the sanctions indicated in chapter 10 of the General Regulations.

Decision making will never be outsourced.

Five or more major non conformities found in a surveillance report will lead to immediate suspension of certification. Certificates will also be suspended if a major non conformity from a prior audit has still not been resolved.

The services of AENOR will send a letter to the company regarding its decision on maintaining the certificate, along with reasons for the decision.

7. EXTRAORDINARY AUDITS

As a consequence of non conformities detected during initial, surveillance or renewal audits AENOR may decide to perform a special audit, preferably within six months of the latest audit, with the aim of ensuring that all non conformities have been properly resolved. It will be performed in the same manner as the initial or surveillance audits, and the corresponding audit plan will define the scope of the audit.

Special audits may also be called for by the company when it asks AENOR to extend certification coverage to new centres.

In agreement with FSC standards, AENOR also reserves the right to perform unannounced visits throughout the certification cycle to ensure compliance with FSC's certification requirements.

8. CERTIFICATE RENEWAL

At least two months before the certificate's expiration date, a renewal audit will be performed to ensure that conditions at the time of issuance have been maintained and that renewal is a viable option.

If the company does not wish to renew the certificate, they must give written notice of the same at least three months before the certificate's expiration date.

Certificates will not be renewed if a major defect exists that shows no sign of being resolved.

AENOR will send a letter to the company about the outcome of their certificate renewal process, along with reasons for the decision. In the case of renewal, a new five-year certificate will be issued.

9. SANTIONS AND MEASURE

The regulations established in the General Regulations for Certificates of Conformity will be followed.

Moreover, in agreement with FSC's related stipulations, CoC certification will be suspended in any of the following situations:

- Five or more major non conformities are detected in a surveillance audit.

- In group and multisite certificates, five or more major non conformities issued to the central office shall result in suspension of the entire certificate. Five or more major non conformities issued to a participant site shall result in suspension of that particular site but not necessarily in the suspension of the entire certificate.
- A surveillance audit finds evidence that proposed corrective actions for major non conformities detected in a prior audit have not been properly resolved in the agreed time period.
- A major non conformity due to lack of a valid FSC licence has not been resolved in the agreed time period (four weeks).

A certificate shall be suspended at latest six (6) months after the closing meeting of an annual surveillance audit, if a certification decision to maintain the certificate cannot be taken due to circumstances beyond the control of the certification body.

The maximum period that a certificate may remain suspended is twelve months.

If certification is suspended or withdrawn, the client must:

- Identify all its major clients and inform them in writing of the withdrawal or suspension within three business days of the same.
- Keep records of this correspondence with their clients.
- Stop the use of any FSC brand or statements mentioning their compliance with FSC certification requirements.
- Stop sales of any products labelled with the FSC brand.

In the case of certification withdrawal, the client will assume all costs for eliminating use of the FSC brand, including names, initials and logos from all products, documents and promotional material.

If new certification requirements or standards are approved while a certificate is suspended, said suspension may not be lifted until an audit is performed to ensure that the client has adopted and implemented all the new applicable requirements and standards.

10. COMPLAINTS

This section describes the procedure followed for the management of any complaints that may be lodged to AENOR, AENOR Internacional or its Societies abroad, by any client or any other interested party (i.e. NGO's, consumer associations, Public Administration...).

The complaints are initially received by the personnel at the Department / Branch office or centre to which they are communicated, who proceed to record and communicate them to DCRS. The format RG/CA/003 "Incident management", is used to record and manage complaints.

The receiver or DCRS will communicate the complaint received both to the Department / branch office or centre responsible for dealing with it and to the Department / Branch office (D/D) or centre from where it was originated. The DCRS shall provide an initial response to the complainant within two weeks of receiving the complaint, including the deadline to follow up on the complaint.

The analysis of causes and immediate preventive, corrective or improvement actions, as applicable, are carried out and registered with the collaboration of DCRS and in common agreement with the DCRS and the D/D or centre involved.

The DCRS shall keep informed the complainant of the progress in evaluating the complaint and shall investigate the allegations and specified all its proposed actions, in response to the complaint within three months of receiving the complaint.

DCRS files the complaint records for at least 7 years and also manages a database that records the content of the filled-in (RG/CA/003) records. DCRS carries out also the control, monitoring and closing of the complaints, including any corrective, improvement, and preventive actions derived from the process.

If the complainant does not agree with the decision made about the complaint, he can address a reasoned submission to the Managing Director of AENOR General Manager, who will give a definitive answer.

Finally, as required by the interested parties, the names of the AENOR members involved in the complaint resolution process will be provided.

Complainants may also present their complaints to the FSC dispute resolution process, if the problem cannot be resolved after exhaustive application of AENOR's own procedures.

11. AENOR ACCREDITATION

In the case of scope reduction, suspension or withdrawal of AENOR's accreditation to perform FSC CoC audits, the certificates of affected clients will be suspended *ipso facto* six months from the date of scope reduction, suspension or withdrawal of AENOR's accreditation.

In this case, clients will be informed by AENOR within 30 days of the scope reduction, suspension or withdrawal of AENOR's accreditation. The clients must find another FSC certification body within the next six months in order to keep their certificate valid.

12. APPLICABLE FEES

AENOR shall establish and communicate upon request the applicable fees with regard to the activities related to granting, maintaining and renewing of the certificate. The applicable fees shall be communicated in the corresponding offer.

The payments made during the granting process shall not be reimbursed to the applicant company in any case.

Moreover, the FSC certification implies some additional costs (*AAF Annual Administration Fee*) that AENOR manages on behalf of and with the authorization of FSC. The fees in force are described in FSC-POL-20-005 (and are available at www.fsc.org). A charge of up to 4% to account for currency conversion costs may be included.

According to FSC-POL-20-005, the AAF is calculated on the basis of the annual turnover of the certificate holder, referred to all certified and uncertified forest products and products containing wood or fiber components. The annual turnover refers to the most recently completed fiscal year. In order to calculate the AAF, AENOR updates annually the information on the annual turnover of the client, on the basis of the information gathered during the audits.

AENOR is not responsible for any sanctions or penalties that FSC might impose, according to FSC-POL-20-005, resulting from inadequate or incorrect information to AENOR by customers on its annual turnover, that may lead to an inadequate or incorrect allocation of the applicable rate.

AENOR will invoice the AAF annually, independently of the invoice related to the activities of audit and certification.