



Description of the process of FSC Chain of Custody certification GP01

Reference: GP01 FSC CoC version 4

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1 - General presentation of FSC certification system

1.1 - Origin of ecocertification

In response to public concerns about sustainability of forests harvesting and of wood uses (essentially tropical ones), forests certification systems, also called ecocertification, were set up.

Certification is an evaluation process by which an independent third party attests that a product, a process or a service, is in accordance with requirements predefined in a standard.

Forest certification consists in proving that forest management is adapted and coherent in the long term on an environmental, social and economic level.

That certification system general purpose is to certify “sustainable” forest management then to transfer the certificate all along the wood manufacturing process down to the final consumer. That transfer is only possible if all the links in the chain of custody (from the forest down to the retailer) are certified, each link in the chain being defined by a transfer of property. It is the certification process called Chain of Custody certification.

1.2 - FSC presentation

The FSC (Forest Stewardship Council) is an independent non governmental membership organization, in association form, based in Mexico. It was created in 1993 by different groups, from 25 countries, representing environmentalist institutions, wood marketing organizations, forest managers, native populations and certification bodies.

The FSC developed the first system of forests certification, essentially based on “forest stewardship principles and criteria” which constitute a forest management international standard. Forests which management is estimated by a certification body accredited by the FSC and that is in accordance with FSC principles and criteria can benefit of a FSC certificate.

That system essentially distinguishes itself from other certification schemes on two points. The international standard shall be locally adapted, at regional or national level; that adaptation and, later on, ground evaluations shall be based on local stakeholder’s consultation, which can be defined as groups implicated in, appointed to or having an interest in forest management.

1.3 - FSC system requirements

FSC system requirements are defined by FSC Forest Management (FM) and Chain of Custody (COC) standards.

FSC Forest management refers to the 10 principles & criteria’s of the Forest stewardship



council which can be used for all forest management application after being adapted to the local particular conditions.

FSC Chain of custody referential is also based on the FSC COC standards.

When Bureau Veritas Certification issues a certificate to a company applying for certification it testifies that the all of the applicable requirements are complied with by the company.

The Following information about BV Certification are available under request: overall performance; review of independence; used policies; certification decision process, implementation of policies and dispute resolution.

The FSC FM & FSC CoC referential requirements are synthetically listed at the 14th part of this document.

2 - Certification proposition

2.1 - Description of the certification process

That document presents Bureau Veritas Certification procedures concerning FSC chain of custody certification of certified wood or paper products. These procedures were developed according to FSC certification system requirements ⁽¹⁾.

The chain of custody certificate granted by BV Certification proves that the applying company meets the requirements of all applicable FSC chain of custody standard(s).

2.2 - Useful definitions

Standard:

Bureau Veritas Certification developed a chain of custody standard for FSC certified products based upon FSC recommendations. The standard defines the requirements that the applicant to certification shall meet and serves as evaluation basis during audits.

BV Certification standards evolve at the same time as the standards and other FSC reference documents.

2.3 - Certification request

Any company interested in certification receives on request a RFQ (Request for Quotation) and the applicable Chain of Custody standard(s).

(1) FSC Principles and criteria, FSC Accreditation manual



2.4 - Preliminary examination of the request and quotation

2.4.1 Writing the Quotation

On return of the RFQ duly filled in, Bureau Veritas Certification prepares a certification quotation. The RFQ also permits to BV Certification to ensure that the company is able to enter the certification process and to maintain it afterwards.

Particular cases:

- Outsourcing

If the company outsources some activities, the company may choose to include its subcontractors in the scope of its certification. In this case, the company should mention the subcontractor names & address and the number of employees and the type of outsourcing to be included in the RFQ.

An evaluation of the risk from the subcontractors will be done in order to quote the auditing time needed to have a proper overview of the subcontractors. A sample of the “high risk” leveled subcontractors will have to be audited by Bureau Veritas. Outsourcing usually increases the auditing time.

The risk level is “high” if one of the following mentions is true:

1. An important part of the production is outsourced.
2. The applicant outsource to a lot of subcontractors on a regular base.
3. The subcontractor classifies the certified raw material.
4. The subcontractor marks the label on FSC certified products.
5. The subcontractor is the last who manage the product.
6. The subcontractor is in a foreign country (from the applicant)

For example, an agency that outsources the printing in different labor printing subcontractors is automatically in a “High” risk because its subcontractors are the ones who stamp the FSC label on the product.

- Multi-site certification

If the company wants to get into a multi-site certification, it should precise it on the RFQ with the name & address of the concerned sites and their activities the number of employees and their turnover.

Bureau Veritas certification will evaluate a sample of sites to be audited.



2.4.2 Sending the Quotation

Together with the offer (SF01) are sent the following documents:

- the present document (GP01 FSC CoC V4.0)
- the general and specific terms and conditions (SF05)

2.5 - Contract

When the company accepts Bureau Veritas Certification's offer, it sends it back signed: the offer then becomes a contract between the company and BV Certification.

Then we talk about the applicant for certification to designate the company. The realization or not of a pre-audit shall have been validated at that moment.

2.6 - Audits preparation

Bureau Veritas Certification and the applicant for certification agree on the audit team's timetable and composition with a view to prepare the pre-audit or the initial audit.

The applicant can ask for a revision of the audit team composition to avoid any risks of conflict of interests between the company and one or several audit team members. The final choice of the audit team composition is nevertheless for Bureau Veritas Certification.

The audit preparation is finalized and presented to the applicant. The documents that will have to be examined by the auditor before the audit are then requested from the applicant.

3 - Auditors of Bureau Veritas Certification Forest-Wood department

3.1 - Auditors' qualification

BV Certification only calls on Forest-Wood industry specialists, in order to favor the following points:

- Independence
- Mastering of the process and industrial techniques
- Industry knowledge

Besides, to be described as a BV Certification auditor, these specialists shall:

- prove a technical competence and a professional experience in the wood industry field;
- have followed a specific training for the audit and FSC system standard;
- Have validated that training by having achieved at least three audits.



For audits realization, specialist auditors are designated according to the 3 following criteria:

- Competence in the Company's field of activity.
- Nearness of the Company's offices.
- Availability on the certification dates wished by the Company.

BV Certification auditors favor a pragmatic and practical approach. Before any other thing, they evaluate the FSC Chain of Custody system as a tool allowing the company to master his activities and to improve them.

3.2 - Audit team composition:

An audit team is formed of at least one BV Certification auditor, sometimes helped by other auditors or consultants (1 to 2 people in general).

If necessary, BV Certification calls on consultants who come with a specific competence in a field or a particular industrial process.

4 - Pre-Audit

4.1 - Pre-audit interest and realization

The pre-audit stage consists in establishing to what extent the certified and non certified products monitoring system meets the requirements of the FSC Chain of Custody standard, and, consequently, if the applicant's commitment in the certification procedure is bound to be finalized.

The pre-audit allows to analyze the company's particularities, to check that the purposes of the procedure are understood by the applicant (questions provoked by the standard, process details, label use...) and to define essential updating actions before the initial audit.

That step is not compulsory in the certification process; nevertheless it is necessary when the industrial process is complex or when the company to be evaluated is important.

In all cases, so as to limit the risks of failure and of extra cost, the pre-audit enables the applicant to check that the organization set up for the certification does not show any major dysfunction.

The pre-audit is in general carried out by the auditor who will be the future initial audit manager.

It consists essentially in a documentary study, accompanied with a visit of one or more production sites. During the pre-audit, the auditor identifies the industrial process implemented as well as the critical monitoring points.

A pre-audit report is given to the applicant; it specifies updating actions to be implemented before the initial audit as well as the time limits to carry out these actions, agreed with the applicant (one year maximum).



4.2 - Setting up Prior Updating Actions

On the pre-audit report basis, the applicant for certification sets up, within the allotted time, updating actions in order to find a solution to dysfunction elements identified during pre-audit.

The applicant then notifies BV Certification by mail that the updating actions have been carried out and BV Certification appoints an audit team to prepare the initial audit. A period of about 3 weeks is necessary for that stage.

5 - Initial Audit

5.1 - Certification Audit Program

In good time, BV Certification passes on the Company a forward-looking intervention program which specifies the Company's organization elements which will be the subject of evaluation as well as a timetable of the interventions. That program can be then reconsidered, according to its coherence with the organization of activities and availability of the people that auditors wish to meet, so as to perturb as little as possible the running of the Company.

If the documentary review or the preliminary audit showed numerous differences that could not be corrected before the certification audit and risking to compromise the certification process, the Company may ask BV Certification for a delay of the audit so as to put itself in conformity.

5.2 - Initial audit realization

The initial audit step consists in checking that the candidate respects all the requirements recorded in the Chain of Custody standard so as to grant or not the certificate.

5.2.1 - Opening meeting

The audit starts by a meeting during which the audit manager confirms the certification extent, presents the audit course and confirms the audit program according to the latest changes that the Company may perhaps wish to bring.

The Company managers are invited to that meeting to have a clear view of the way in which the audit will take place and therefore be able to inform their colleagues.

5.2.2 - Audit Course

The work of the audit team will be done on documents at first, then through inspections of the production site or sites. Within this scope, interviews of the employees are held and, if necessary, of outside participants (suppliers, subcontractors...).

The initial audit principle missions are as follows:

- Visit the applicant's offices.



There the audit team carries out an evaluation of the operational system of implementation and monitoring of the certified products chain of custody. It also gathers detailed and precised information on the nature, species and volumes of the companies' products as well as on the managers of the various operations carried out.

- Visit the production site(s) and encounter the different operators.
- Define the dispositions not in keeping with the standard and discuss the encountered problems with the company managers and the staff concerned.

5.2.3 - Synthesis Meeting

At the end of each audit day, meetings are organized so as to sum up the audit progress and the first results synthesis. The differences encountered during the day are analyzed thus allowing the Company to start the corresponding corrective actions.

They also allow to analyze the results of the corrective actions already started, and in certain cases to close corresponding nonconformities.

5.2.4 - Closing Meeting

The Audit Manager organizes a closing meeting at the end of the audit. It gathers, as far as possible, the same people as those who were present during the opening meeting.

That meeting enables to present the audit results and its conclusions. During the closing meeting the audit manager:

- Gathers (SF02) issued "nonconformity reports" and gives the originals.
- Prepares and presents to the Company the audit conclusions for agreement and signature.

Then, the audit manager gives the Company a file containing the following elements:

- The audit report (SF36).
- A certificate taking up again the audit results.

At that stage, the initial audit results only expose the noted situation and facts; they do not allow the certificate allocation decision.

The audit team produces a temporary initial audit report three weeks after evaluation at the latest and submits it to the Bureau Veritas Certification technical manager concerned.



6 - Nonconformities and Corrective Actions

6.1 - Nonconformities

The dysfunctions met during the audit are commented by the auditor with the Company representative, who can then bring complementary elements allowing seeing them again in a more global context.

These dysfunctions are then formalized on a nonconformity report (SF02 form - Nonconformity Report) the original of which is left to the Company. The originals of these SF02 are signed by the Company representative.

The nonconformities thus formalized always meet the following 3 criteria:

- Be objective and motivated by non respect of a standard requirement or a disposition planned by the company.
- Be founded on proof and in no case on presumptions.
- Be understood and accepted by the Company.

According to their importance, nonconformities appear as recommendations, minor corrective actions requests or major corrective actions requests.

6.2 - Corrective actions

Three corrective action levels exist:

- Recommendations: remarks concerning either dysfunctions or risks not treated by the standard or an imperfect ad equation between the implemented chain of custody system and the FSC Chain of Custody standard requirements. The company can be certified but it shall improve these points in question.
- Minor corrective actions requests (minor CAR): the company can be certified but it shall put itself in conformity with the requirements in question during the year following the initial audit and at the latest before the first surveillance audit. Then, a minor CAR as to be solved in the following year (exceptionally 2 years). If not, the minor CAR will become a major CAR after the surveillance audit.
- Major corrective actions requests (major CAR): the company cannot be certified as long as it doesn't satisfy the requirements of the CAR. It would be asked to have a complementary audit, specific to major corrective actions in order to obtain or maintain its certification. If a major CAR is not solved after 3 month (exceptionally 6 months), the certification will be immediately suspended. Also, if 5 or more major CAR is detected in controlling audit, an immediate suspension of the certificate will be pronounced.



On the Company's request, BV Certification auditors give a decision on the admissibility of the corrective actions that it intends to start.

The Company can start corrective actions to solve the nonconformities as soon as the nonconformity reports have been signed.

The nonconformity reports originals filled in by the Company are returned to the Audit Manager.

7 - Certification

7.1 - Certification Decision

On the basis of the initial audit report and the certification applicant's comments, the certification decision is taken.

The Forest-Wood office will meet on the second Thursday of every month to take the certification decisions.

The time limit between the initial audit and the certificate granting is estimated to be 45 days but will possibly be shortened in case of the applying organization's express and motivated demand.

The certification Committee will reconsider the certification decision during its next half-yearly meeting.

7.2 - Certificate Granting

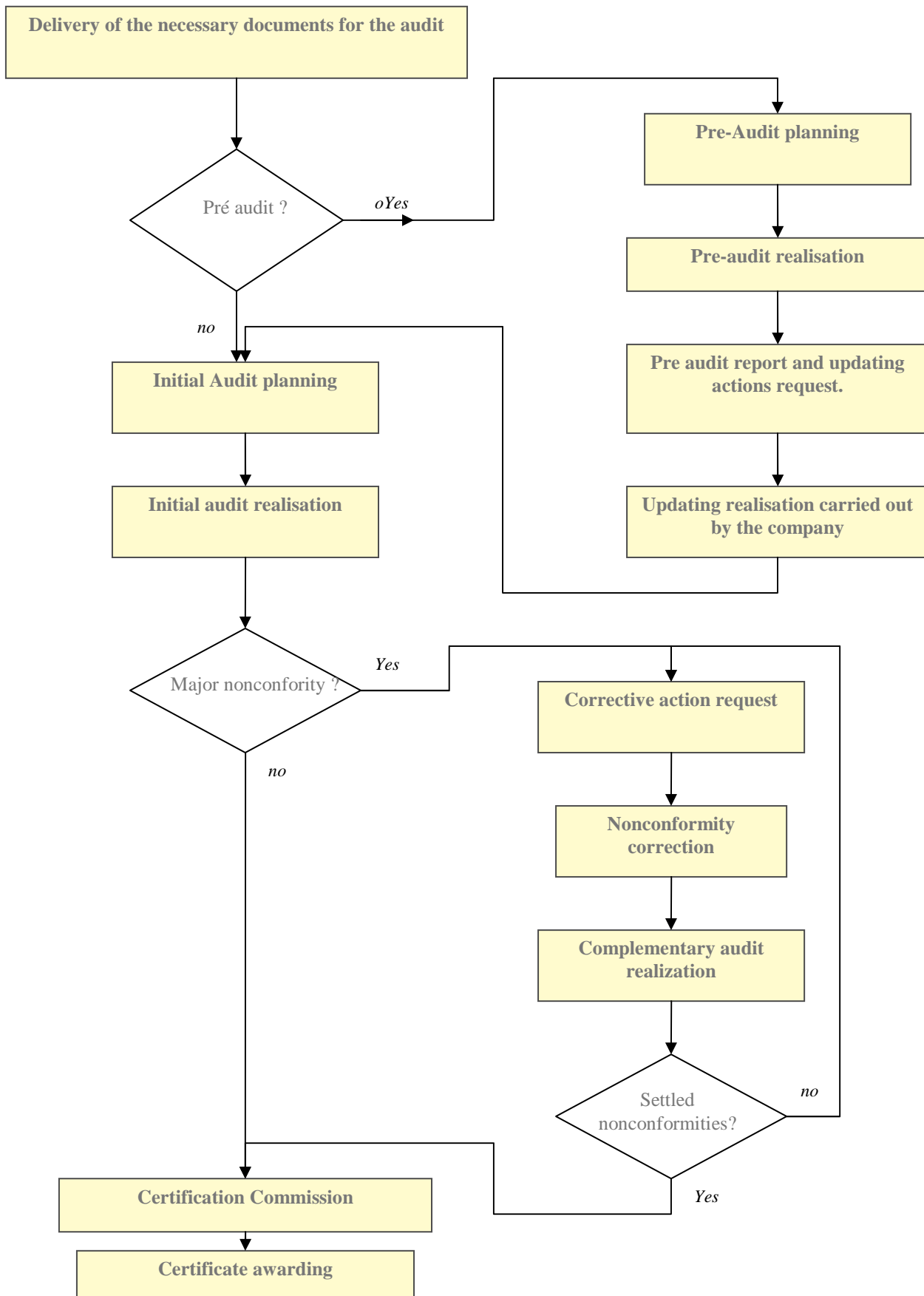
When the certification decision is favorable and the applicant accepts the recommendations and possible corrective actions requests, the certification is given for five years.

A numbered certificate is given to the applicant who becomes a certified organization.

The company can then use the FSC label - while respecting use conditions, see appendix 1.



8 - Recapitulation of the certification process





9 - Use of FSC and Bureau Veritas Certification labels

9.1 - Use of the FSC label

The certified company is given a logo pack, with a license number for the use of the FSC label.

The certified company shall respect the FSC label use conditions, for its product use as well as for its promotional use. These conditions of use are on appendix 1 and are contractual obligations.

Bureau Veritas Certification insists on the fact that the certified company shall subject to BV Certification any FSC label use for approval **before** starting the aforementioned use.

9.2 - Use of Bureau Veritas Certification label

The company certified by Bureau Veritas Certification can use the BV Certification label, associated to the FSC label, but the size of the BV Certification logo shall not be bigger than the FSC logo and if it consists in product marking the FSC label shall be sufficiently visible to avoid any confusion (data processing provided on demand).



10 - Certificate maintenance

10.1 - Surveillance Audits

Programmed surveillance audits are carried out each year. Bureau Veritas Certification can carry out unforeseen monitors in the offices or on the field of the certified organization.

Surveillance audits enable to monitor:

- The management continuation as evaluated during the initial audit;
- The implementation of minor corrective actions and eventual recommendations;
- The correct use of the FSC label by the certified organization

During the certificate validity period (5 years), if Bureau Veritas Certification notices important nonconformities entailing major corrective actions requests, **the certificate is then suspended during the necessary time for conformity setting.**

Each year, the certified company provides Bureau Veritas Certification with the list of the "certified products" purchased or sold. The company specifies the species, the nature, the quantity as well as the suppliers or the products addressees. These pieces of information, strictly confidential, enable to follow the certified products before and after property transfer.

10.2 - Renewing Audit



At the end of the five years, the certification contract can be renewed. To do so, Bureau Veritas Certification proceeds with a complete new evaluation of the certified company (comparable to the initial audit).

Afterwards, the certification process is carried out in the same way as previously.

10.3 - Management of the disputes linked to the certificate

Bureau Veritas Certification developed within the scope of the FSC certification system, a process based in great part on consultation and concertation.

The latter operates through the forest entity's information and consultation, at the different stages of the certification process, but also through the consultation of all the stakeholders involved in the practised forest management.

These consultation and voluntary participation general principles enable to avoid any dispute concerning certification benefits.

Nevertheless, if a conflict appears within the scope of a certification decision, Bureau Veritas Certification has set up disputes resolution procedures, enabling to deal with the latter with maximum independence and according to the following particularities:

- everything is implemented by Bureau Veritas Certification to solve the conflict in an amicable manner.
- when the conflict concerns a certification decision, the certification Committee intervenes in the resolution;
- when the conflict concerns the use of the certification make or the referential requirements, the FSC is regarded as the final judge.

11 - Certification cost

11.1 - The certification process costs

Costs, inherent to the certification process and at the applicant or the certified organization's expense are shared out in the following manner:

a) File instruction cost

The audits preparation needs an instruction of the information provided by the applicant and a planning of the operations (audit team constitution, stakeholder's preliminary consultation, diverse documents realization, communication with the applicant).

b) Audits cost (pre-audit, initial audit and surveillance audit)

These costs correspond to the evaluation time, on the field, of the audit team and the reports redaction time. They are function of the evaluation length and the number of auditors involved.

c) Annual fee linked to the certification according to the FSC label

When the certificate is granted, an annual fee is invoiced, payable by the certified organizations, calculated according to the company's turnover (as far as its activities linked to wood or fibers are concerned).

That fee is set by a price list produced by FSC.



d) Traveling and accommodation costs

During the audits, the auditors traveling and accommodation costs are payable by the applicant or the certified organization, on the basis of written proof provided and within the limits of a budget predefined in the contracts.

e) FSC Brand Pack

The access to FSC Brand Pack, on the FSC web site, containing the various models of the use of the FSC label, is gifted to the applicant who has passed the certification process.

11.2 - Various services basic rates

Bureau Veritas Certification invoicing unit is, depending on cases, the day or the half day on the basis of:

600 € per day for file instruction.

1080 € per day for in situ auditing and report writing.

12 - Suspension or withdrawal of the certificate

A certified organization practice or non-completion of a corrective action, leading to one or several nonconformities to the requirements defined within the FSC referential can be brought to Bureau Veritas Certification's knowledge.

During a conflict or after denunciation of a nonconformity, Bureau Veritas Certification makes sure of the truthfulness of the collected information and reports to the Certification committee.

In all cases, Corrective Action Requests are expressed if necessary.

The Certification committee then makes a decision depending on the importance of the nonconformity, which is judged in the following manner:

- If the nonconformity is due to an involuntary action, it justifies a conditional maintaining of the certificate. The certificate is maintained subject to the carrying out of the corrective action(s) requested by the Certification committee, within a period of time that it defines.
- If the nonconformity is due to a deliberate action, it justifies, depending on the seriousness of the facts, a temporary suspension or a definitive withdrawal of the certificate.

In case of serious and indisputable failure to comply with the requirements of the referential or the label conditions of use, Bureau Veritas Certification remains authorized to suspend the certificate, temporarily and without concentration with the Certification committee.

In any case, a partial withdrawal of the certificate is not planned within the scope of FSC certification.

The scope of the certificate can be modified (extended or reduced) under request of both parties (BV Certification or the certificate holder). In case of scope extension, BV Certification reserves the right to inspect the site of the certificate holder. Any scope modification cannot extend the validity period of the certificate.

In order to remove a suspension of certificate, a complementary (documentary or field) audit should take place in order to check the carrying out of the requested corrective action(s). The certificate can then be granted again. In case the requested corrective action(s) is (are) not carried out, the certificate is then withdrawn.

Suspension of a certificate cannot last more than one (1) year.

In case of certificate suspension or withdrawal, the entity shall remove all FSC Trademark uses within 3 months after certificate termination.



13 - Applicable standards

13.1 – FSC-STD-40-004 v2

The second version of the FSC-STD-40-004 standard is now applicable for all the chain of custody applicant since the April the 1st 2008.

This standard replaces:

The part 3.6 of the accreditation manual (RF03 FSC CoC Traders & Printers)

The 1st version of FSC-STD-40-004 standard (RF03 FSC CoC Manufacturers)

This standard respects the 3 systems:

- Transfer
- Percentages
- Credit

According to the already certified companies the dead line of use of the old version of FSC-STD-40-004 v1.0 standard is December the 31st 2008.

The FSC-STD-40-004 v2.0 have to be respected in all site eventually concerned by the certification.

Our internal document referring to this standard is actually the RF03 FSC CoC 40 004

13.2 - FSC-STD-40-005 v2.1

That standard concerns companies which mix non certified material to FSC certified material, in order to produce FSC certified products according one of the “FSC Mixed” labels.

It takes up again the requirements relative to that non certified raw material so as to guarantee the credibility of the system.

FSC-STD-40-005 v2.1 shall be respected in each site concerned by the certification standard.

Our internal document referring to this standard is RF03 FSC CoC Controlled wood. List of the documents needed for application.

13.3 - FSC-STD-40-003 v1.0

In case of multi site certification, the applicant will also be audited against this FSC standard.

13.4 - FSC-STD-40-007 v1.0

In case of reclaimed material used in the applicant process, the applicant will also be audited against this FSC standard.



14 - List of documents to provide for application

So as to inform the audit team before the first evaluation and, in certain cases, to be able to establish a personalized services offer to the company, it is necessary to transmit to Bureau Veritas Certification, within a 10 days time limit before the audit, the following elements:

14.1 - For an individual application for certification:

- The company's leaflet
- Monitor Chain in-house Procedure
- Any document allow to evaluate the dispositions specifically taken for certification, in particular concerning the chain of custody or monitoring of FSC products and the responsibilities taken at company level.

14.2 - For an application for group or multi site certification

- Certification management procedure at group level
- Any document allowing to evaluate the dispositions specifically taken for certification, in particular concerning the chain of custody or monitoring of FSC products and the responsibilities taken at group level and at the level of each group member or of each site.

15 - FSC standards synthesis

15.1 - Forest management standard

The 10 FSC principles used for the FSC forest management standard

Principle 1: Respect of Laws and FSC Principles

The company shall be in conformity with the laws in force in the country as well as all the international treaties which that country has signed. It will too be in conformity with FSC Principles and Criteria.

Principle 2: Tenure security, customary rights and responsibilities

Long-term land and forest tenure security and customary rights shall be clearly defined, documented and legally established.

Principle 3: Native populations' right

The native populations' common law and legal rights concerning property, territory and resources management and use shall be recognized and protected.

Principle 4: Community relations and workers' rights

The forest management operations shall maintain or improve long-term social and economic well-being of forest workers and local communities.



Principle 5: Forest services

The forest management operations shall encourage efficient use of multiple forest services and products to guarantee economic viability as well as a wide variety of environmental and social services.

Principle 6: Environmental impact

Forest development shall maintain biological diversity and the values which are associated to it, water resources, grounds as well as landscapes and fragile and unique ecosystems, in such a manner that they ensure functions conservation and forest integrity.

Principle 7: Management document

A management document in adequacy with the suggested company intensity and size shall be written, implemented and updated. Long-term management objectives and the means to reach them shall be clearly indicated.

Principle 8: Monitoring and evaluations

A regular monitoring, in relation with the size and intensity of the company, shall be carried out to evaluate the forest state; the output, the chain of custody and forest products sale; management operations and their social and environmental impacts.

Principle 9: Maintenance of high value forests for conservation

Development activities in high value forests for conservation shall maintain or improve the attributes which define such forests. Decisions concerning high value forests for conservation shall be taken in the context of a precautionous approach.

Principle 10: Plantations

Plantations management and planning shall be in conformity with Principles and Criteria 1 to 9 as well as principle 10 and its criteria. As well as providing numerous social and economic benefits and contribute to satisfy the world demand in forest products, plantations should usefully complete the natural forests developments, reduce the pressure they undergo as well as promote their conservation and restoration.

15.2 - Chain of Custody standard

The elements defined for the FSC Chain of Custody standard.

1 - Identification of the critical monitoring points

The company shall identify the sites where a risk of confusion between FSC products and other products exists.

2 - Mastering the supplies

The company shall master its supplies, in particular know precisely if it is a matter of certified raw materials or not.

3 - Recordings and data

The company records all the useful data for the implemented monitoring of the chain of custody system.

4 - Separation of products and chain of custody

The company shall implement a chain of custody system (by segregation or identification) of FSC products.



5 - Organization and training

The company shall implement an organization and a specific training of FSC Chain of Custody follow up.

6 - Subcontracting

The company ensures the respect of the certification requirements by its subcontractors.

7 - FSC manufactured products sales

The company shall take specific measures for sold FSC products identification (pieces or lots marking).

16 - Confidentiality

The office staff and BV Certification auditors commit themselves to deal in a strictly confidential manner with any information or any document which they happen to know of at the time of an audit.

That confidentiality can be removed in the following cases:

- Legal appeal.
- Written agreement granted by the Company.

17 - Observers' participation to audits

BV Certification France can be led to associate observers to its Certification or monitoring audits. These observers can be:

1. BV Certification France in-house auditors (within the scope of BV Certification France in-house audit activities)
2. BV Certification International in-house auditors (BVQI France in-house audit by BV Certification International network)
3. BV Certification auditors in training
4. ASI auditors (Accreditation Services International - Accreditation Organization for FSC) (at the time of a BV Certification France audit within the scope of accreditation programs)

The company has to accept the presence of an accreditation organization representative during BVQI audits. In the other cases, the observer's presence is submitted to the Company's agreement.

18 - Appeal, dispute and complaints

Bureau Veritas Certification has its own process to manage appeals and complaints. However the client can refer his complaint to FSC's dispute resolution procedures.



Appendix 1: FSC label rules of use

Requirements summarized and extracted from FSC documents:

FSC-STD-40-201 - FSC on-product labeling requirements

FSC-STD-TMK-50-201 - FSC requirements for the promotional use of the FSC Trademarks by FSC certificate holders and non-certified commercial organizations

1 - Generalities

- **The FSC label** is formed of:
 - The full name "Forest Stewardship Council";
 - The initials "FSC";
 - The FSC logo;

The FSC label **shall be** used on the invoices of any FSC product sale.

The FSC label **can** be used on the products or their packaging provided of course that they come from FSC forest or raw material.

Every **new use** of the FSC label shall be subjected to a preliminary and written **approval** by Bureau Veritas Certification (except for FSC labels, once approved, their use as such on other mediums is no longer the subject of a new approval).

The label can/shall be accompanied with various comments (specified further) which are not subjected to particular printing constraints (fonts, sizes, colors...) and can be set anywhere on the medium used, as long as the latter is not separable.

For example: for a catalogue of products, explanations can be used only once whereas the label appears at various times;

- **The certification label of Bureau Veritas Certification**
 - can be used, associated to the FSC label, but the size of the BV Certification logo shall not be bigger than the FSC logo and if it consists in product marking the FSC label shall be sufficiently visible to avoid any confusion (data processing provided on demand).



2 - Use of the label on-product (Product use)

The FSC label **can** be displayed on products sold as such (FSC products). The FSC claim **shall** be used on accompanying documents of the products (invoices, delivery slips...).

2.1 - On the product itself



When the label is directly applied on the wood with the help of a stamp, a stencil or by hot marking, it shall be accompanied with the certificate number and, if possible, marked "TM" accompanying the FSC initials: "FSC™".

In that case, an FSC label (see hereinafter) shall be applied on a label or a sticker that accompanies the product itself. The label noted on the tag or sticker shall respect the following paragraph.

2.2 - On the product packaging

When the label is noted on the product packaging, including cardboard packaging, brochure, tag, sticker, blister pack..., it shall be presented as one of the following FSC labels. These labels:

- shall integrate the certificate number before any use (preferably in eps format, consult us if needed);
- shall be used in the colors and formats defined in the FSC Brand Pack (save approved exceptions);
- shall measure more than 1.1 cm high (landscape) and 1.9 cm wide (portrait);
- can be accompanied by an explanation note (see hereinafter and a piece of information concerning the FSC fibers percentage in the product group);
- cannot be used in association with another forest certification label (PEFC, SFI, CSA...);
- can be exceptionally replaced by another simpler label (get in touch with us to envisage such a case).

1 pure FSC label

Only FSC fibers

5 labels FSC mixed

FSC + controlled wood



Fichiers FSC_100...

FSC + controlled wood + recycled
"wood"



Fichiers FSC_MS3...

FSC + recycled "wood"



Fichiers FSC_MS1 et MS2 ...



Fichiers FSC_MS4 et MS5 ...



1 recycled FSC label

Only recycled fibers



FSC_RE Files...

8 labels versions presented above exist; it is advisable to consult the FSC Brand Pack to have a complete view of the available labels.

According to the terms of document *FSC-POL-40-001 - FSC Policy on percentage based claims*, the requirements of which are applicable until the end of 2006, it is possible to associate the FSC label with the minimum percentage in case FSC and non-FSC woods are mixed in a wood lot or a product (example: "minimum 73 %"). In that case the percentage figures shall be of equal size to the "FSC" logo letters.

For all the details concerning the labels, would you please consult the "FSC Product Labeling Guide" document in the Brand Pack.

3 - Promotional use of the FSC label

That part takes up the standard FSC-TMK-50-201 requirements which concern the use of the FSC label for the general promotion of a certified company or a non-certified marketing organization (distributor...). Nevertheless we will only take into consideration the requirements relative to certified companies as it is the certification body which is in charge of checking the use of the label for them. *For information: The use of the label for non-certified marketing organizations is managed by the agent appointed by FSC in the appropriate country or by FSC International Centre if there is no agent in the country.*

As a general rule, the declarations relative to FSC certification shall:

- Not jeopardize FSC integrity and credibility
- Be documented and easily checked
- Not refer to the notion of durability in a "sustainable development" or "sustainable management" sense.

To respond to the latter requirement, it is recommended to use the terms "responsible forest management" or "well managed forests".

3.1 - Procedure

The certified company using the FSC label for its promotion shall:

- Have the "FSC Brand Pack"
- Submit to the certification body's approval each use of the FSC label
- Keep proof of the certification body's approval as well as the use of the label recordings, for a minimum duration of 5 years
- Put at FSC disposal (on its demand) any document relative to the use of the FSC label
- Respect the hereinafter requirements.



3.2 - The FSC label promotional use general rules

When the label is noted on leaflet, headed stationery, Internet site..., it **shall** be accompanied with:

- The certificate number;

Moreover, when the logo is used, it shall be accompanied with:



- The copyright mark: "© 1996 Forest Stewardship Council, A.C." (or "© 1996 FSC" when the space available is too small);
- a promotional mention: "Responsible forestry mark" or "Responsible forest management" The certification body can nevertheless decide to replace that mention or add to it a mention that it defined and that corresponds better to the certified company's activities.

These elements shall be clearly visible on the promotional medium, preferably at the place where the logo is used for the first time. It is not necessary to indicate all these elements each time that the logo is used on the same medium: only once is sufficient.

The certified company can also add:

- An extra declaration provided that it has been approved by the certification body.
- FSC's internet addresses (www.fsc.org) or that of FSC national initiative of the appropriate country.

Remark 1:

The certified company shall not mention on its promotional medium the percentage of FSC material in its FSC product.

Remark 2:

Certified companies which have not produced, labeled or sold FSC products since their latest audit shall not use the FSC label for their general promotion. These companies shall use the FSC label only in relation with products that can be sold as FSC and while specifying that these products are available on request.

3.3 - Use of the FSC label with other labels

The use of the FSC label with another forest management label shall not:

- Lead to whatever association with that other label
- Be disadvantaging in relation to that of the other label (position, size...)

When the certification body's label is used for the promotion of a certified product or a certification system,

- The FSC label shall not be used in a disadvantageous manner with respect to the certification body's label (position, size...)
- The FSC logo shall be used



3.4 - Particular rules of use of the FSC label

➤ Reduced size promotional medium

When the label is used on very small media (pencils, business cards,...) or is submitted to particular constraints (promotional items such as T-shirt, cup...), it is possible for the certified company to indicate only its certificate number, so long as the certification body has approved of that use.

➤ On headed stationery

The FSC label shall not be used at the top of the headed stationery.

➤ On the FSC products invoices

When the label is used in a systematic manner on the invoices or the delivery slips, the following mention shall appear: "Only products identified as such on that document are FSC certified".

➤ Designation of the FSC products

When the certified company wishes to refer to the FSC label in its product name, it shall use:

- The mention "FSC certified", before or after the product name (for example: "FSC certified Golden Timber" or "FSC certified – Royal paper"),

OR

- The «™» symbol that follows immediately the label, in that case, the « FSC™ » mention shall appear before the product name (for example: « FSC™ Royal paper », « FSC™ Golden timber »).

➤ Promotion of FSC products on documents

When the label is used on documents to specifically promote FSC products, it is then possible to use the FSC labels as described in the chapter "Use of the label on the product".

➤ Trade fairs and exhibitions

When the FSC label is used on a trade fair / exhibition stall, the FSC products shall be correctly labeled, as described in the chapter "Use of the label on the product"

When there is no FSC product on the stall, the promotional mediums shall indicate that the products are available on demand.

Remark:

The certified company exhibiting shall be able to provide any FSC representative with the proof that the uses of the label were approved by the certification body.

4 - Synthesis

In short, for a good use of the FSC label, you shall check that:

- The certificate number is specified in all cases

To increase the value of the FSC products, an FSC label is used (product use)

- It is used only for the product, its packaging or a document referring to the product
- It is in conformity with the original format (color, form and proportion of the logo...)



- It contains the certificate number
- It measures more than 1.1 cm high (landscape) or 1.9 cm wide (portrait)

To increase the value of the certification, if the FSC logo is used (promotional use)

- It is in conformity with the original format (form and proportion of the logo, copyright symbol presence, FSC initials font...)
- The exclusion zone is respected (color contrast between the logo itself and the background, no double or underexposure)
- It measures more than 1 cm high
- The copyright mention appears
- The promotional mention is specified

If the Bureau Veritas Certification logo is used

- It is not bigger or more emphasized than the FSC logo / label



Appendix 2: Note on the functioning of the FSC Chain of Custody certification for group of companies

That certification type concerns small companies, legally independent from one another and situated within the same country.

The interest of that certification type is to reduce the certification financial cost but also, by means of centralizing certain liabilities, help the implementation for the small independent companies that will gather under the authority of a Centralized Management Unit (CMU).

A small company, according to the criteria defined by FSC, wishing to accede to the group certification, shall:

- Not have more than 15 employees (whether full time, part time or other)

OR

- Not have more than 25 employees **and** no more than 1 million US dollar yearly turnover.

The Centralized Management Unit can be an individual, a cooperative, an association, or any other similar legal entity.

In the case when the CMU is an association or any other organization composed of members, it is not compulsory that all its members be members of the certification group.

Note: no requirement is asked to have a maximum size limit for a group, nevertheless the CMU and Bureau Veritas Certification will have to make sure of the CMU capacity (particularly in human, financial and technical means) to manage a group and to maintain it to standard. Besides, including new members will only take place once a year and in agreement with Bureau Veritas Certification.

1 - Duties of the entities involved in the certification

1.1 - Centralized Management Unit Duties

- The CMU applies for certification then is bound by contract to Bureau Veritas Certification
- The CMU holds the group certificate
- The CMU is responsible for the communication between Bureau Veritas Certification and the group members companies (hereinafter referred to as "members")
- The CMU is responsible for the setting up of the administrative requirements and the group management
- The CMU is responsible for the setting up of the group monitoring
- The CMU is responsible for the good application of the requirements relative to the Chain of Custody certification and to the use of the FSC label
- The CMU is responsible for the payment of the certification costs to Bureau Veritas Certification

1.2 - Obligations of the group members companies

- Each company shall meet the FSC Chain of Custody requirements.
- Any statement concerning the "certified" status of the company or its certified products shall refer to the group. Every member company shall use its own Chain of Custody number on its sales documents.



- The group member companies are bound to the centralized management unit by the signature of a participation Agreement.

The Participation agreement guarantees in particular that the member company:

- *Recognizes and accepts the requirements and liabilities linked to its group member status*
- *Authorizes the Centralized Management Unit to apply for certification in its name*
- *Commits itself in the certification procedure for the whole length of the certificate, that is to say 5 years,*
- *Commits itself to meet the requirements linked to the certification.*

1.3 - Requirements to be met by the central office

- The CMU shall finalize guidelines which explain the Chain of Custody procedures for the different member companies.
- The CMU shall follow every company and monitor it yearly (see chapter on in-house monitoring)
- The CMU shall clearly define and document its liabilities as regards the member companies, Bureau Veritas Certification and FSC.
- The CMU shall clearly define and document the member companies' liabilities in their Chain of Custody, as regards the CMU, Bureau Veritas Certification and FSC.
- The CMU shall have a system for member companies' training and information. That system shall be operational and implemented.
- The CMU shall at least provide each member company with:
 - A copy of the FSC reference standard (according to the Chain of Custody system set up)
 - An explanation of certification procedures
 - An explanation of FSC and Bureau Veritas Certification's rights to have access to the member companies' sites and documentation
 - An explanation of FSC and Bureau Veritas Certification's requirements concerning public information.
 - An explanation of all costs associated with group membership
 - An explanation of group certification requirements, such as:
 - Maintaining the information to ensure the companies monitoring
 - Use of a system to trace the certified products
 - The need to respond to corrective actions requests or Bureau Veritas Certification observations
 - The requirements specific to the promotion or sale of products covered by the certificate
 - The FSC label conditions of use
 - The correct use of the certificate number (and the code attributed to every company)
 - Other obligations linked to a group participation
- The CMU shall keep all the documents relative to certification, for a 5 years minimum length of time. These documents are at least composed of:
 - The certification group member companies list stating their manager's address and theirs, as well as their entrance date in the group and the code that was allocated to them
 - The Participation agreements signed by all the member companies
 - The documentation and the recordings relative to the certification area of the Chain of Custody for each of the companies
 - Recordings relative to in-house monitoring of all member companies. These recordings are composed of the proof of the in-house audit realization, the identified nonconformities and the corrective actions set up by the company to correct these nonconformities, in this particular case.
 - The documentation summarizing the supplies as well as the quantities produced and sold for every member company
 - A certification group companies' exclusions/departures register indicating the date and reasons for any exclusion/departure



- The proof that the member companies meet well the "small company" criteria defined by FSC
- A register of complaints
- The CMU shall determine a particular procedure for the admission of new companies once that the certificate has been granted
- Before any admission, the CMU shall carry out an in-house audit of the company wishing to integrate the group. That audit shall both focus on the company's procedures and documents and on the setting up and the practical running of its Chain of Custody.
 - The CMU shall inform BV Certification within 1 month of any company's admission.
- The CMU can exclude a group company when the latter does not meet group in-house requirements or if it does not respond in a satisfactory manner to a corrective action request, from the CMU or BV Certification.
 - The CMU shall inform BV Certification within 1 month of any company's exclusion.
- The CMU shall make sure of the good use of the FSC label (use on product and promotional use) by all the member companies, that is to say: check that all uses of the FSC label are preliminarily approved by Bureau Veritas Certification.
- The CMU shall make sure that corrective actions requests which could appear at the member company's level are correctly implemented.

2 - Certification functioning

2.1 - In-house monitoring

Before any Bureau Veritas Certification audit, the Centralized Management Unit shall have carried out an in-house audit in each group Member Company and therefore applicant to the certification.

As mentioned before, that audit shall be focused on both the procedures and documents of the company as well as on the setting up and practical functioning of its Chain of Custody. That procedure has to be renewed for every company wishing to integrate the group, once the certification has been granted.

Afterwards, the CMU shall audit each year each member company (except those selected by BV Certification for the monitoring audit) and have a system to communicate to Bureau Veritas Certification the results of these in-house audits.

The in-house audits can give rise to corrective actions requests, generated by the CMU towards member companies. The CMU can also, if it thinks that the actions carried out are not sufficient, exclude the company in question from the certification group.

2.2 - Monitoring ensured by Bureau Veritas Certification:

➤ Initial audit

The CMU is being audited.

The member companies are being audited on a sampling basis:

The sampling rate goes from \sqrt{X} (with X the workforce number of the group) to X (100% of the member companies), depending on a risk evaluation.

At least 25 % of the chosen companies are picked out at random.

➤ Monitoring audit

The CMU is being audited.



The member companies are being audited on a sampling basis:

The sampling rate goes from $0,6 \cdot \sqrt{X}$ (with X the workforce number of the group) to X (100% of the member companies), depending on a risk evaluation.

At least 25 % of the chosen companies are picked out at random.

➤ Integration of new companies

When companies are integrated into the certification group, they are considered as a different group for the sampling.

One will thus lead a separate sampling, based on rules specific to the initial audit, but while taking up again the risk analysis preliminarily defined.

At least 25 % of the chosen companies among the new companies will be picked out at random.

These companies will be subjected to an initial audit, before being integrated the following year into the total number of the group.

2.3 - Certificates

The group certificate will be delivered to the CMU by Bureau Veritas Certification, with a certification number as: BV-COC-000000.

Each member company will be given a code letter (in the alphabetical order) and so each member company will have its own certification number as: BV-COC-000000-A, BV-COC-000000-B and so on...

Note: if a member company leaves the group, its code letter will not be given again (to another company for example).

Each company member will have to use its certificate number (that is to say the group certificate number as well as the code letter that it was given) on sales documents and on the uses of the FSC label.

The group certificate will indicate:

- The name of the group
- The group certificate number

BV Certification will be able to choose and provide certificates to the member companies. These certificates will indicate:

- The name of the group
- The name of the member company
- The company certificate number (that is to say the group certificate number as well as the company's code letter)

2.4 - Uses of the FSC label

As for all the certifications, the uses of the FSC label as well as of the BV Certification label shall be subjected to BV Certification for approval before use.

Besides, FSC will establish a logo use license for each member company but the CMU may choose not to allow the logo use as sub license.



Appendix 3: Note on the functioning of the FSC Chain of Custody certification for a multi site company

The chain of custody certification for “multi-site” companies according to FSC-STD-40-003 can be provided.

That type of certification concerns companies from which legally depend several sites of production, storage, sales and so on... within the same country (pilot projects are being examined to spread that certification system to cross-border countries).

The interest of that type of certification is to lighten the certification financial cost but also, while centralizing certain responsibilities, to facilitate its implementation for all the other entities depending on the same organization.

To set up a multi site certification, the company shall appoint a "central office" which will supervise the certification in all the sites.

It is not compulsory that all the sites the company owns be integrated to the certification procedure. On the other hand, the sites that will be integrated to the procedure will have to be classified in “sites subsets” according to their activity and their Chain of Custody system. Afterwards one will distinguish the sites, the sites subset and the central office.

1 - Duties of the entities involved in the certification

1.1 - Obligations of the central office

- The central office is linked by contract to Bureau Veritas Certification
- The central office is responsible for the good application of the requirements relative to the Chain of Custody certification and to the use of the FSC label
- The central office is responsible for the payment of the certification costs to Bureau Veritas Certification

1.2 - Sites obligations

- The sites included in the certification area are linked to the central office in that certification procedure through the signature of a Participation agreement.

The participation Agreement guarantees in particular that the person in charge of the site:

- *Recognizes and accepts his responsibilities in the Chain of Custody certification process*
- *Commits itself in the certification procedure for the whole length of the certificate, that is to say 5 years,*
- *Commits itself to meet the requirements linked to the certification.*

1.3 - Requirements to be met by the central office



- The central office shall finalize the certification in-house procedures (manual and guidelines) which explain the requirements to be met by the different sites
- The central office shall clearly define which are its responsibilities and those of the sites
- The central office shall at least provide every site integrated in the certification area:
 - A copy of the FSC reference standard (according to the Chain of Custody system set up)
 - An explanation of certification procedures
 - An explanation of FSC and Bureau Veritas Certification's rights to have access to the sites and their documentation
 - An explanation of FSC and Bureau Veritas Certification's requirements concerning public information
 - An explanation of multi site certification requirements, such as:
 - Maintaining the information to ensure the site monitoring
 - Use of a system to trace the certified products
 - The need to respond to corrective actions requests or Bureau Veritas Certification observations
 - The FSC label conditions of use
- The central office shall keep all the documents relative to certification, for a 5 years minimum length of time. These documents are at least composed of:
 - The list of the sites integrated to the certification procedure stating their address as well as their manager's, the sites subset to which they belong, their date of entrance into the certification area, and their date of exit if that is the case
 - The Participation agreements signed for all the sites included in the certification area
 - The recordings relative to the in-house monitors (different sites monitoring)
 - The documentation summarizing the quantities produced and sold for every site
 - A certification area sites exclusions register indicating the date and reasons for any exclusion
 - A register of complaints
- The central office shall determine a particular procedure for the admission of new sites as well as a limit backed up by figures (percentage or threshold) to the number of new sites that may be integrated each year
- The central office can exclude a site or a site subset from the certification area but shall inform Bureau Veritas Certification:
 - Immediately, when it consists in a subset of sites
 - Within one month's time limit, when it consists in one or several sites
- The central office shall make sure of the good use of the FSC label (use on product and promotional use) by all the sites, that is to say: check that the uses of the FSC label are preliminarily approved by Bureau Veritas Certification
- The central office shall make sure that corrective actions requests which could appear at the sites level are correctly implemented

2 - Certification functioning

2.1 - In-house monitoring

Prior to any Bureau Veritas Certification audit, the central office shall have carried out an in-house audit in each site integrated to the certification procedure. The results of these in-house audits will be used for Bureau Veritas Certification to select the sites which will be audited during the initial audit.

Afterwards, the central office shall audit yearly each site integrated to the certification area and produce an in-house monitoring report which will be communicated to each manager of the certified sites.



Every new site wishing to integrate the certification area will have to be subjected to an in-house audit. The in-house audits can give rise to corrective actions requests, generated by the central office towards the sites. The central office can also, if it thinks that the actions carried out are not sufficient, exclude the site in question from the certification area.

2.2 - Monitoring ensured by Bureau Veritas Certification

➤ Initial audit

The central office is being audited.

The sites are being audited on the basis of a subset sampling:

For each subset, the sampling rate goes from \sqrt{X} (with X the workforce number of the subset) to X (100% of the sites), depending on a risk evaluation.

At least 25 % of the chosen sites are picked out at random.

➤ Monitoring audit

The central office is audited at every audit.

The sites are being audited on the basis of a subset sampling:

For each subset, the sampling rate goes from $0,6*\sqrt{X}$ (with X the workforce number of the subset) to X (100% of the sites), depending on a risk evaluation.

At least 25 % of the chosen sites are picked out at random.

➤ Integration of new companies

When sites are integrated to the certification area, they are considered as a different group within the appropriate subset.

One will then lead a new sampling, with the rules specific to the initial audit, but while taking up again the risk analysis preliminarily defined for the subset. The selected sites will be subjected to an initial audit, before being integrated the following year into the total workforce number of the subset.

2.3 - Certificates

The certificate will be delivered to the company by Bureau Veritas Certification, with a certification number as: BV-COC-000000.

For companies with several subsets, a letter will be given to each subset, a certification number will be then given to each subset, as: BV-COC-000000-A, BV-COC-000000-B and so on...

2.4 - Practical case

The company possesses 5 sawmills, 3 joiner's workshops and 8 sales premises.

Out of these 16 sites, only 13 are concerned by the certification area: the 5 sawmills the 3 joiner's workshops and 5 out of 8 sales premises.

In initial audit, will be audited:

- The central office (the company's head office)
- $\sqrt{5}$ sawmills, $\sqrt{3}$ joiner's workshop, $\sqrt{5}$ sales premises (minimum)

If the audit results are satisfactory, a certificate will be delivered to the company with the number BV-COC-000000.

The sawmills will be granted number BV-COC-000000-A, the joiner's workshops, number BV-COC000000-B and the 5 sales premises concerned with the certification, number BV-COC-000000-C.



In monitoring audit, will be audited:

- The central office (the company's head office)
- 0,6*√5 sawmills, 0,6*√3 joiner's workshop, 0,6*√5 sales premises (minimum)

If 2 extra sales premises wish to integrate the certification area, in the n+3 year, then one will have the following audits:

- The central office (the company's head office) in monitoring audit
- 0.6*√5 sawmills, 0.6*√3 joiner's workshop, 0.6*√5 sales premises (at least) _ in monitoring audit
- √2 X12 sales premises (at least) _ in initial audit

The following year (n+4), one will have:

- The central office (the company's head office) _ in monitoring audit
- 0.6*√5 sawmills, 0.6*√3 joiner's workshop, 0.6*√7 sales premises (at least) _ in monitoring audit