



CHAIN OF CUSTODY PROCEDURES FOR MULTIPLE SITES



Procedures for Chain of Custody Certification of Multiple Sites by the Soil Association's FSC® and PEFC™ accredited Schemes

1. Eligibility

To qualify for eligibility for certification under a group scheme, there must be a Central Office who will take responsibility for the certification and who has the authorisation of the Participating Sites to do so. Note: Soil Association Certification will not proceed with the evaluation if any of the eligibility criteria for the multi-site organisation are not met. Soil Association Certification will not issue a certificate if during the audit nonconformities in relation to these eligibility criteria are found.

FSC:

The size of each group member is limited to either:

- (a) less than 15 employees, (including full-time, part-time and seasonal staff) **or**
- (b) less than 25 employees and under US \$1,000,000 turnover

PEFC:

The producer group is limited to participation of sites which are:

- (a) domiciled in a single country and
- (b) have no more than 50 employees (full time employees equivalent) and
- (c) have a turnover of maximum of 9,000,000 CHF, or equivalent.

OR

Under the policy for Multi-Site chain of custody certification, all participating sites must be subject to a common chain of custody system, which is administered centrally. The products and processes used at all the participating sites in each set of sites must be of the same kind (note there can be more than one set of sites under one Multi-Site certification).

Additionally, a multi-site organisation must confirm authority at application over all sites for the following COC issues:

- 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.

2. Enclosures

The Group Chain of Custody Application Pack contains the following:

- Soil Association Certification **Chain of Custody Certification of Multiple Sites** procedures (this document)
- Chain of Custody Information form

The applicable standards are located at:

- FSC Chain of Custody standards FSC-STD-40-004 (latest version as on website: <https://ic.fsc.org/en/document-center>)
- FSC Chain of Custody certification for Multiple Sites FSC-STD-40-003 (latest version as on website: <https://ic.fsc.org/en/document-center>)
- PEFC Chain of Custody standard latest version as on PEFC website: <https://www.pefc.org/resources/technical-documentation>

The applicant should complete all the site details on the Chain of Custody Information form and send it to Soil Association Certification. The applicant is welcome to discuss the certification process with Soil Association Certification staff.

3. Preparation

Please first satisfy yourself that the operations for which you are seeking certification meet the requirements laid out in the Standards above. If you have any queries, please do not hesitate to contact Soil Association Certification.

The standards are designed to ensure that you have a system in place that ensures that products which contain certified timber can be identified as such (FSC or PEFC). These products are then eligible for labelling.

Soil Association Certification can carry out certification of any of your suppliers which are not yet certified, on request. Please do not hesitate to contact us for further information.

4. Pre-evaluation Visit

We are happy to arrange a pre-evaluation visit to your business to discuss your situation, go over the standards with you, and clarify any doubts you may have about the certification process. At the pre-evaluation visit an auditor will walk your production process and can highlight any areas where there are likely to be problems complying with the standard. The length of time a pre-evaluation depends on the complexity of your operations.

In addition, the auditor will discuss the proposed sampling methodology for an evaluation with you. The sampling methodology will consider a number of factors including the type of processes taking place on sites, number of sites, centralisation of record keeping, etc. A record of the proposed sampling methodology will be provided to you in the scoping report. Please contact Soil Association Certification if you would like a copy of the way we calculate sampling (Sampling assessment for multiple sites, which is included in our report).

You may apply for evaluation of your chain of custody system prior to your receiving certified timber, and a certificate can still be issued. In this case we may need to arrange a surveillance visit soon after you receive your first consignment of certified timber.

If you have any questions concerning the Information Form, please do not hesitate to contact us.

5. Audit

To ensure that certification proceeds smoothly, as much information as possible is gathered before the audit takes place. This is why the application form is quite detailed, and why a pre-assessment is required. If we feel that additional information would help ensure a successful audit, we will contact you before the visit. We will then set up an audit: the auditor will contact you directly to arrange a mutually convenient date and time.

Important note: it is a requirement that you submit a copy of your manual of procedures to the Soil Association Certification Auditor prior to the audit, ie. while you are still considered an applicant. If we have not received this in advance the audit may have to be postponed.

A contract and schedule will be sent to you together with a Trademark Licence Agreement and an invoice for the fees for the visit. Any expenses for travel or accommodation will be recharged at cost after the audit.

6. Evaluation

6.1 Central Office Systems Analysis

The auditor will carry out the Central Office Systems analysis using the Soil Association Certification **Chain of Custody Certification of Multiple Sites** standard and checklist. The systems analysis will normally take 1 day to complete, depending on the size and complexity of the group.

6.2 Participating Sites Sampling

The auditor carries out the audit of a sample of Participating Sites using the Soil Association Certification Chain of Custody standard checklist. The sampling methodology will have been outlined in the pre-assessment report and may be refined during the systems analysis. The procedure for each site visit is otherwise the same as for single site evaluation visits.

The auditor will identify any parts of the standards which are not fully complied with and will discuss any conditions to certification with you. The auditor can discuss with you what kinds of actions could be appropriate to comply fully with the standard. However, ultimately it will be up to you to decide what you must do to meet the standard, and up to the Soil Association Certification office (not the auditor) to determine whether the actions you take are sufficient to comply fully.

At the end of the evaluation visit the Auditor will discuss the preliminary evaluation results with you.

After the evaluation visit the auditor will submit a written report to Soil Association Certification, detailing all the observations made during the visit, listing any identified non-compliances with the standard and describing any conditions that were discussed. We will send you a copy of the Soil Association Certification report and ask you to comment on it before we make our certification decision.

7. Certification Decision

We will then finalise our certification decision based on the auditor's report and any comments you have made.

The Soil Association Certification office will consider whether any conditions (CAR - Corrective Action Request) to certification that have been identified are 'Major CARs' or 'Minor CARs'.

- A CAR will be considered 'Major' when Soil Association Certification can no longer tell whether products meet the certified wood content requirements for FSC or PEFC labelling, or where there is a clear risk of this happening in the future. A CAR is 'Major' where either a major element of the system for chain of custody control is missing, or its implementation has totally broken down. Major conditions will need to be complied with prior to the issue of a certificate.

- A CAR will be considered 'Minor' when Soil Association Certification is confident that the products meet the certified wood content requirements for FSC or PEFC labelling, but where there is nevertheless an infringement of the standard. A CAR may be 'Minor' when there is a temporary or partial lapse in the functioning of an existing part of the system for chain of custody control. Minor CARs may be corrected within an agreed time period after the issue of a certificate.

It is important to note that the Central office is responsible for ensuring that ALL Participating Sites comply with any CARs issued, and not only at the site at which the specific example of non-compliance was identified. A serious non-compliance from one member can threaten the entire group certification.

In Multiple Sites certification, Soil Association Certification may identify non-compliances at the Central Office level or Participating Site level. Soil Association Certification will issue corrective action to the Central Office and Participating Sites. It is the Central Office's responsibility to ensure corrective action is taken at both levels. In the event that the Central Office fails to ensure compliance and/or corrective action at the Participating Site, Soil Association Certification may issue Major Corrective Action, Suspend or Terminate at the level of the Central Office.

1) Central Office level CARs may be issued in the following circumstances:

a) failure to fulfill a central office responsibility, such as administration, record-keeping, logo use etc;

b) failure of the central office to correct a non-compliance identified by the certification body;

c) failure(s) of central office responsibility, sufficient in number, extent and/or consequences to demonstrate that the group entity's responsibility for monitoring or quality control is inadequate.

NB: if more than one non-compliance relating to the same requirement is noted by Soil Association Certification at Participating Site level then an additional corresponding Minor CAR may be issued at the Central Office level dealing with the systematic nature of the issue and group procedures. If five or more non-compliances relating to the same requirement are noted by Soil Association Certification at Participating Site level, then an additional corresponding Major CAR may be issued at Central Office level dealing with the systematic nature of the issue and group procedures.

2) Participating Site level non-compliances may be issued in the following circumstances:

a) failure to meet the requirements of the COC standard by a participating site;

b) serious or persistent failures of any other requirements of Soil Association Certification or FSC /PEFC.

If a Central office has correctly identified a CAR prior to the Soil Association Certification Audit and issued an appropriate internal Corrective Action with appropriate timescale, Soil Association Certification will not normally issue a CAR on the issue unless it involves a critical breakdown of the COC system.

Once the decision has been finalised:

- If there are no CARs we will issue a certificate;

- For FSC, if there are only minor CARs we will issue a certificate on the basis that you agree to take appropriate actions to come into full compliance within a specified time frame (usually three months to a year);

- For PEFC in COC Main Assessments or Re-assessments a Minor CAR must be closed prior to certificate issue and constitutes a Pre-condition. This includes Minor CARs at Site level for Multi-sites.

- If there are major CARs we will not issue a certificate until after you have taken appropriate actions and after we have agreed that you comply fully with the relevant part of the standard.

Once Soil Association Certification has finalized the report, and the certification fee has been paid, a Certificate of Registration will be issued, usually valid for five years conditional on successful annual surveillance.

8. Certification Codes

Soil Association Certification can on request issue individual certificates to Group members. These will have specific certification codes which refer to the group certificate and indicate that they are a member of a larger group certification scheme. The Central Office is responsible for ensuring that these codes are used correctly.

9. Use of the FSC Trademarks

In conjunction with an FSC Trademark License Agreement (which Soil Association Certification will provide to you and must be signed prior to a Main Evaluation), the Soil Association Certification certificate authorises the certificate holder to use the FSC Trademarks (the FSC name, initials, and logo) in accordance with FSC's regulations for their use. You will be given an internet link where you can download copies of the trademark formats which must be used. The Central Office must follow these guidelines and must seek written approval from Soil Association Certification for any use of the FSC logo by the Central Office or any Participating Site *before* going to press/publishing on websites, etc.

10. Use of the PEFC Trademarks

The Soil Association Certification programme is accredited by the United Kingdom Accreditation Service (UKAS) for the Programme for the Endorsement of Forest Certification (PEFC) scheme. This means that our certificate holders have the right to apply for a Logo License to use the PEFC logo on their products and off-product claims. UKAS makes sure that our procedures meet their accreditation requirements and will be monitoring us to ensure we are implementing our procedures properly.

AFTER YOU ARE CERTIFIED

11. Surveillance

Surveillance visits will take place at least annually and are usually arranged well in advance. The surveillance visit is very similar to the initial evaluation visit and is designed to ensure that only products made from 'FSC-certified' or 'PEFC-certified' material are described as certified. Soil Association Certification also reserves the right to make unannounced surveillance visits. A surveillance schedule will be described in the certification report.

12. Corrective Action Requests

If any CARs are identified after you have received your certificate, we will discuss the CAR with you and show them on your report, which lists the CARs together with a time frame for completion. As for the initial evaluation, we will specify whether the CAR is 'Major' or 'Minor'. The time frame for correction of CARs will be specified on the compliance form. A major condition will usually require a site visit to confirm compliance. In exceptional circumstances, for

example if it is clear that non-certified products are being labelled as certified, Soil Association Certification would suspend the certificate with immediate effect.

13. Failure to correct a Minor CAR within the agreed time frame

If you have been asked to correct a minor CAR and Soil Association Certification is not satisfied that appropriate actions have been taken, the condition will be upgraded from a 'Minor' to a 'Major'. The Major CAR must now be corrected within three months, and the action taken may need to be confirmed by a site visit by a Soil Association Certification auditor.

14. Failure to correct a Major Corrective Action Request within the agreed time frame

If you have been asked to correct a Major CAR and Soil Association Certification is not satisfied that appropriate actions have been taken within the specified time limit, we will consider that you are no longer complying with Soil Association Certification Chain of Custody Standard and Chain of Custody Certification of Multiple Sites Standard and we will withdraw your certificate.

15. Withdrawal of the Certificate

All certificates are issued subject to continued compliance with the certification standard. If you are in breach of the standard, Soil Association Certification will withdraw your certificate. Soil Association Certification must specify which part of the standard is not complied with. If your certificate is withdrawn you must immediately refrain from all use of the Soil Association Certification and Certification Scheme Trademarks, and refrain from describing your products as certified. Soil Association Certification reserves the right to require you to remove Trademarks from previously labelled products.

You must return your certificate to Soil Association Certification. All claims, promotional or marketing materials that make use of Soil Association Certification's or FSC's, name, label, logo, certification mark or Trademark must be withdrawn.

A certificate will only be re-issued following completion of a satisfactory full audit.

16. Extensions

After the certificate has expired it can be re-issued for a further five years upon completion of a satisfactory full audit.

17. Changes to our Standard

Whilst we make every effort to minimise changes to our certification standards, changes may be necessary from time to time. We will inform you in advance of any such changes and ensure that you have sufficient time to comply with any new requirements (not usually more than 12 months). If you are not able to comply within the time frame we do however reserve the right to withdraw your certificate.

18. Soil Association Certification and Accreditation

The Soil Association Certification programme is accredited by Accreditation Services International (ASI) to carry out FSC certification assessments. This means that our FSC certificate holders have the right to use the FSC Logo on their products and off-product claims. ASI makes sure that our procedures meet FSC accreditation requirements and monitors us each year to ensure we are implementing our procedures properly. On some issues ASI has authority over us. In particular ASI has the final say as to whether our standards meet FSC's minimum requirements.

19. Soil Association Certification and the Programme for the Endorsement of Forest Certification (PEFC)

The Soil Association Certification programme is accredited by the United Kingdom Accreditation Service (UKAS) for the Programme for the Endorsement of Forest Certification (PEFC) scheme. This means that our certificate holders have the right to apply for a Logo License to use the PEFC logo on their products and off-product claims. UKAS makes sure that our procedures meet their accreditation requirements and will be monitoring us to ensure we are implementing our procedures properly.

20. Complaints

If for any reason you ever wish to lodge a complaint, please contact us. We will try to resolve your complaint in discussion with you, but if we are unable to do so we operate an independent complaint resolution procedure. We will be pleased to provide you with an explanation of these procedures.

For FSC, if you are still not satisfied with our performance you have the right to lodge a formal complaint with ASI - Accreditation Services International GmbH:

Friedrich-Ebert-Allee 69, 53113 Bonn, Germany

Phone: +49 (228) 227 2370; Fax : +49 (228) 227 237 30

Email: asi-info@accreditation-services.com

or the FSC UK office at: Forest Stewardship Council UK:

The Billiard Room, Town Hall, Great Oak Street, Llanidloes, Powys, Wales, SY18 6BN, UK.

Phone: 01686 413916; Fax: 01686 412176,

Email: info@fsc-uk.org for further details

In the case of PEFC, you have the right to lodge a formal complaint with the PEFC National Office or PEFC International:

ICC Building C, Route de Pré-Bois 20, Case Postale 1862, 1215 Geneva 15, Switzerland

Phone: +41 (22) 799 4540

Email: info@pefc.org

Soil Association Certification will cooperate with any further investigation carried out by FSC or PEFC.

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