



RULES FOR THE CONCESSION AND MAINTENANCE OF
CHAIN OF CUSTODY CERTIFICATION OF PRODUCTS
FROM THE FOREST (FSC® – CHAIN OF CUSTODY)

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**The mark of
responsible forestry**

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Technical rules

RULES FOR THE CONCESSION AND MAINTENANCE OF CHAIN OF CUSTODY CERTIFICATION OF PRODUCTS FROM THE FOREST (FSC® - CHAIN OF CUSTODY)

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CHAPTER 1 – AIM

1.1

These Rules describe the procedures applied by RINA for the issue of chain of custody certification FSC®-CoC (Forest Stewardship Council®) in the wood sector and how the mark can be applied for, obtained, maintained, renewed and used as well as possible suspension, withdrawal and surrender of certification.

1.2

The terminology used in these Rules complies with the terminology given in the FSC Standards related to Chain of Custody (Standard, Policies, Procedures, Guidance Documents, Advice Notes).

For the definition of the terms used in these Rules, reference is to be made to the FSC Standards for Chain of Custody, except as regards:

AC: Corrective Action
ASI: Assurance Services International¹
NC: Non Conformity
OdC: Certification Body

CHAPTER 2 – GENERAL

2.1

The certification system covered by these Rules represents an implementation of the FSC® Standard for the certification of the chain of custody of an organisation which produces, transforms and/or markets forestry products.

Thanks to this certification, it is possible for an organisation which produces, transforms or markets forestry products to guarantee the origin from sustainable forest management of the material uses through traceability of the raw forestry material throughout its production process(es)/activities.

The Chain of Custody certification is applied at site level. An organisation can have one or more sites to which is applied the Chain of Custody System.

2.2

Access to the RINA services contained in these Rules is open to all organisations and does not depend on whether they belong to an association or group, provided they come under the field of

application of the certification scheme for chain of custody of products from the forest (wood or cellulose derivatives (or non wood forest products)) in the following called FSC-CoC.

In relation to certification, RINA will check applicability of the applicant organisation by referring to the standard in force, will apply its current fees, ensuring fairness and uniformity of application to every type of product/process/activity.

RINA provides the FSC – Chain of Custody certification service under the authority of FSC and its certification system is FSC accredited for the Chain of Custody Certification Worldwide (excluding China).

RINA conducts its certification operations according to its defined accreditation scope and in conformity with:

- the requirements of all applicable FSC normative documents as published on the FSC website (ic.fsc.org);
- its operational policies, procedures and instructions.

RINA informs affected clients within thirty (30) calendar days after the reduction, suspension or withdrawal of its scope of FSC accreditation, that its accreditation scope has been reduced, suspended or withdrawn. The clients will be informed that they have to seek a new certification body within six (6) months to keep their certification valid, as applicable

2.3

In connection with the application of these Rules, RINA does not provide consultancy services to organisations for the setting up of a management system or to implement procedures to ensure compliance with the requirements of the reference standard.

In order to begin the Chain of Custody certification process, an organisation must:

- prepare written procedures for product control and traceability in compliance with the FSC Chain of Custody Standard;
- carry out a risk assessment (in the case of outsourced activities);
- develop an audit programme for suppliers of the reclaimed material (if applicable);
- implement a management system in compliance with the prepared system documents (manual, procedures, etc.);
- accept the requirements of the FSC Standard and of these Rules and the communications from RINA.

¹ Accreditation Body for FSC® certification scheme

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All the reference documentation for FSC-Chain of Custody is listed in the FSC document catalogue and is published on the FSC website: ic.fsc.org/en/document-center.

At the request of the organisation, a preliminary audit may be made on site to check the general state of implementation of the FSC-CoC scheme.

Any further request of clarification about the content of this rule can be asked to RINA.

CHAPTER 3 – CHAIN OF CUSTODY CERTIFICATION PROCESS

3.1

Organisations wishing to obtain chain of custody certification must provide RINA with the main data of their organisation/production, location of the site(s) where the product to be certified takes place, scope of certification (product(s) subject to certification, reference standard(s), by filling in the form "Informative questionnaire" (available upon request), on the basis of which RINA will prepare an offer, and which must include the following information:

- name and address of applicant;
- type of company;
- turnover and number of employees;
- list of products;
- reference standard(s);
- information relevant to recycled materials(if applicable);
- outsourcing (if applicable);
- list of suppliers of recycled material (if applicable)
- sites number, category and addresses
- information on actual or previous FSC certifications (or with other schemes)

RINA performs an initial analysis in which it checks:

- that the certification scope is in line with RINA accreditation;
- any items in the informative questionnaire not filled in or to be clarified with the client;
- that the necessary resources are available to carry out the audits within the time frame;
- the existence of any non-certified suppliers of recycled material included in the organisation's audit plan;
- that there are qualified resources able to perform the audits, bearing in mind the organisation's sector and the language used by the certification applicant

(identifying the need for an interpreter where necessary);

- whether it is necessary to carry out on-site audits of sub-contractors and non-certified suppliers and draw up a sampling plan of the sub-contractors, non-certified suppliers and of the sites (in the case of multi-site or group organisations).

3.2

Once the offer has been drawn up, an organisation formalises its request by sending RINA the form "Request for FSC® chain of custody certification for forest based products" (available upon request) containing the name of the organisation, product(s), process(es), activities, site(s) subject to chain of custody certification of forest products and the most recent version of the FSC License Agreement.

On receipt of the signed FSC® license agreement, request form and relevant enclosures and following their preliminary examination to check completeness, RINA will send the organisation written acceptance of the request and it'll ask for the sending of the chain of custody manual (the sending is optional).

The organisation's request and related acceptance by RINA contractually formalise the latter's activities performed according to these Rules.

Should the FSC license agreement not be made available to RINA, the contract will not be opened, the certification process will not be concluded and the certificate will not be issued.

RINA communicates the names of the auditors in charge of the audit to the organisation which may object to their appointment, giving its reasons, within 3 working days of the communication of the appointment of the audit team.

RINA appoints the audit team and sends them the information necessary to perform the audit. On the basis of the information received, the audit plan is drawn up and sent to the organisation.

3.3 – MULTIPLE SITES ORGANISATIONS

The requirements reported below are applied in case of Multiple Sites and they are additional requirements to the FSC Chain of Custody Standard (FSC-STD-40-004). Reference is to be made to the appropriate FSC Standards in force as regards the definition of Multiple-Site.

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In the case of group or multi-site organisations, the audit is performed on a sampling basis. If the purpose of the audit is a single chain of custody operation, then all the sites will be audited.

Sampling will cover all types of applicant organisations (user companies, primary processing companies, secondary processing companies, trade, other). The group's headquarters / central offices are always audited and are not included in the number of sample sites. The Participating Sites shall be divided into two (2) sets of sites: Normal Risk Participating Sites and High Risk Participating Sites, which shall be sampled separately on the basis of the following formula (for main evaluation, surveillance evaluations and re-evaluation):

$$y = R \sqrt{x}$$

y indicates, rounded up to the next whole number, the number of Participating Sites to be audited;

R indicates the Risk Index (according to FSC Standard);

x indicates the total number of Normal Risk or High Risk Participating Sites included in the certification scope.

In the case of surveillance evaluations, Participating Sites which have not had any FSC activity according to standard FSC-STD-20-011, since the previous evaluation do not need to be included in the population of sites from which the sample is drawn.

Selection of the sample to be audited is made randomly and in such a way that the sites subject to audit are representative of the organisation and thus cover as wide a range as possible in terms of:

- Geographic distribution;
- Activities and/or products produced;
- Size of the Participating Sites (size may be determined by the number of employees, production volumes and/or annual turnover of forest product sales);
- Other criteria, as deemed relevant by RINA.

The audit is performed according to the applicable FSC reference standards.

RINA reserves the right to check, at least once during the five-year validity, all the production sites subject to certification.

In the case of Multi-site and Group organisations:

- the head office is contractually responsible to RINA for compliance with the requirements of these Rules and with the standard(s) applicable to all participating sites included in the certification scope;
- the head office is entirely responsible for payment of first certification costs and for its maintenance throughout the validity of the certificate;
- each time a participating site is removed from certificate, the head office is required to send RINA a written communication within 3 working days of the change;
- RINA evaluates the ability of the Central Office to manage the number of Participating Sites of the certificate and approves an annual growth rate up to a limit of 100% based on the number of Participating Sites at the time of the evaluation. .

3.4 – AUDIT ON-SITE

The on-site audit is performed according to the FSC-CoC standards by a qualified team which may also consist of just one person and sets out to assess the organisation's ability to correctly and effectively implement the Chain of Custody management system through:

- Verification of a valid document of agreement between the organisation and the FSC;
- Assessment of the available technical resources (e.g. system and technology for the FSC certified production control, segregation materials);
- Available human resources involved in the Chain of Custody (including their responsibilities and role, level of training and experience, the availability of expert advice if required);
- For Multi-site certificates, the identification of the complexity and of the scale of the activities covered by the certificate scope;
- identification and assessment of management documentation and a sufficient variety and number of records, at each operational site selected for evaluation in order to confirm that management is functioning effectively and as described, particularly with respect to the identified critical points;
- Interviews with a sufficient variety and number of employees and contractors at each operational site selected for evaluation in order to verify the

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Organization's conformance to all applicable certification requirements²;

- Evaluation of The Organization's implementation of all applicable Corrective Action Requests;
- on-site verification of a sample number of contractors ($y = \sqrt{x}$) selected from among the outsourced activities and included in the certification scope;
- review of all complaints, disputes or allegations of non-conformities received by the Organization and/or the certification body;
- Purchasing and sales documentation of any materials or products related to FSC certification (invoices, bills, transport documents, sales contracts);
- Confirmations that inputs described as FSC-certified or FSC Controlled Wood were covered by a valid FSC Chain of Custody certificate and supplied with the applicable FSC claims and certification codes;
- Evaluation of systems for controlling FSC Claims (Percentage, Credit and Transfer System);
- The correct use of the FSC Trademarks (on-product and promotional) and the 'FSC Controlled Wood' claim in segregation marks, sales and transport documentation; - Training records (e.g. training materials, participants list)
- Assessment of the trademark use management system, if in place
- all other elements needed to assess compliance with the reference standard.

Moreover, in the case of several participants/sites:

- Verification that all sites operate according to the same procedures (where applicable) and the same product certification methods under the same management systems;
- Verification that different sets of sites are identifiable under the multi-site schemes;
- Verification of all sites included on the same certificate;
- Verification of sites on a sample basis (just in case of group or multi-site organisations), according to the sampling methods described in 3.3;
- all other elements needed to assess compliance with the reference standard.

In the case of organisations which do not physically possess FSC-certified materials or products and which do not label, modify, store or re-package products (i.e. sales offices or agents),

documental checks may be undertaken in lieu of the on-site audit (as described in the section 3.5).

Products which have been sold or which have already left the chain of custody system prior to certification being obtained (i.e. issue of the certificate) cannot be considered certified products and therefore cannot be labelled FSC.

3.5 – DOCUMENTAL AUDIT ONLY

Desk audits may be conducted in the following case:

- Organisations which do not physically possess FSC-CoC-certified materials or products and which do not label, modify, store or re-package products (i.e. sales offices or agents);
- Storage sites of finished and labelled products, and where RINA has confirmed through an initial physical inspection that there is no risk of mixing FSC certified products with other materials. (i.e. sites that only store FSC certified products). RINA shall conduct physical inspection of these storage sites at least once during the five years duration of a certificate
- In these cases, the organisation is required to send RINA the necessary documentation

3.6 –SPECIAL CASES

The Chain of Custody certificate can be issued before the organisation has physically taken possession of FSC-certified material, provided RINA is satisfied with the Chain of Custody management system in place.

In these cases, the organisation is required to notify RINA of the first available stock of FSC-certified material or production start-up of FSC-certified material.

RINA will carry out a second on-site audit or a surveillance audit within 3 months from receipt of the notification unless NC emerged from the initial audit related to critical aspects of the management system.

3.7 – MAJOR AND MINOR NON CONFORMITIES AND RECOMMENDATIONS

Following the audit, an audit report is prepared, which complies with the contents of the FSC Chain of Custody Standard, and which formalises any findings identified during the audit. The organisation is given a copy of this Report of Finding (RoF). The organisation is to insert, in the appropriate fields in the report, the cause analysis,

² Comments can be provided in confidence

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the treatment and the proposed corrective actions related to any non-conformities found during the on-site audit.

A major Non Conformity is considered a fundamental lack in fulfilling a significant requirement within the operations included in the certification scope of the Chain of Custody and which:

- continues over a long period of time; or
- is a systematic non conformity; or
- is a non conformity which affects a wide range of production; or
- is a non-conformity affecting the integrity of the FSC system; or
- has not been corrected or adequately addressed by the Organization once identified.

The organisation is required to propose CA also in the case of any NC concerning suppliers.

The existence of a major non conformity enable the issuance of the certificate during the first certification and during the renewal and leads to a suspension of certificate validity if it is not closed within 3 months if it is issued during a surveillance audit.

The absence of a valid document of agreement stipulated between the FSC and the organisation leads to the issue of a major NC which, if not resolved within two (2) weeks of its issue, will result in the certificate not being issued or renewed or else being suspended.

A minor Non Conformity is considered one where a requirement of the Chain of Custody reference standard has not been complied with but which:

- is a temporary lapse; or
- is an unusual/non-systematic non conformity; or
- results in the impacts of the non conformity being limited from a time and organisational point of view; and
- does not lead to a fundamental lack in complying with a significant requirement.

Major or minor non conformities may also arise as a result of complete or partial non compliance with these Rules.

A recommendation is considered:

- a problem which does not constitute at the moment a non conformity but which could lead to one in the future if not dealt with by the organisation.

If major non conformities are issued as a result of the first certification or renewal audit on site, the organisation has three months in which to

resolve them; if they are not resolved within this period, the certificate will not be issued.

A specific on-site audit or a documental audit will be carried out to check their resolution.

Minor NC can be resolved within a year and will be checked during the annual surveillance audit.

A minor non conformity which has not been resolved will be reissued as a major NC and will have to be resolved within the ensuing 3 months.

Any major NC which has not been resolved leads to immediate suspension of the certificate.

Corrective action must be defined by the organisation within 10 days of issue of the NC and approved by RINA before the certificate is issued.

Major non-conformities shall not be downgraded to minor non-conformities.

Non conformities are recorded in the audit report and, in the case of Multi-site or Group, divided as follows:

- non-conformities identified at Central Office level and potentially due to:
 - o inability to cover responsibility at Central Office level (i.e. administration, internal audits, maintenance of records, use of the mark);
 - o inability to ensure that the Participating Sites included in the certification scope comply with the corrective action requirements issued by the certification body or by the head office;
 - o inability of sites to fulfil a responsibility, sufficient in number of sites, extent of the failure, and/or consequences, to demonstrate that central office control has broken down (e.g. where identical nonconformities identified by the certification body are issued to three or more participating sites during an evaluation, the corrective action request may be a result of ineffective training or support by the central office);
- non conformities identified at Participating Site level could be due to:
 - o inability to cover responsibility at Participating Site level (for example: timely communication of appropriate information, effective response to internal

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- corrective action, proper use of the mark, etc.);
- o non compliance with the requirements of the applicable FSC reference standards.

The results of the main evaluation are valid for a maximum period of six (6) months. Within this period a certification decision should be taken. Otherwise, the results of the main evaluation are considered out of date and a new on-site main evaluation shall be conducted before a certificate can be issued.

A certificate is issued to The Organization that has direct management responsibility for the Chain of Custody system under their control.

RINA may issue a Chain of Custody certificate that covers more than one site, according to the eligibility criteria specified in FSC-STD-40-003.

3.8 – ISSUE OF THE CERTIFICATE

RINA reserves the right to delay or postpone its decision on certification in order to take proper account of new or additional information which has become available to RINA and which has not already been considered in its evaluation report and which, in the opinion of RINA, could affect the outcome of its evaluation.

If the outcome of the audit is positive, the documentation produced by the audit team is subject to an independent technical audit. The auditor responsible for carrying out this final check of the documentation prepared by the audit team may ask for further clarifications or change the classification of one or more findings identified by the auditors. Should the decision be taken not to issue the certificate, RINA will inform the organisation in writing, giving its reasons.

The organisation will be required to pay for the audit activities contained in the accepted offer, even if the outcome of the certification process is negative.

Once the checks have been successfully completed, RINA sends to the company the final report and issues a certificate of conformity to the FSC-CoC scheme which is valid for five years.

The certificate can be of three types:

- single;
- group;
- multi-site

and contains the following elements:

- the FSC logo of the same size as the RINA logo;
- the name and address of RINA;

- the legal name and registered address of the certified organisation;
- the sites involved in the production process of the products subject to certification, including those of any third parties;
- a description of the type of products covered by the certificate, indicating the product group they belong to, the wood species, category of FSC material and the production processes involved;
- specific standard reference against which it has been checked, indicating the current approved official version;
- indication of whether certification is partial or complete (only in the case of project certification);
- reference to the FSC database to record the certificate (<http://info.fsc.org>);
- declaration that the certificate will belong to RINA which issued it and that all copies or reproductions of the certificate will have to be destroyed at the request of RINA;
- date of issue of the certificate;
- expiry date of the certificate (not applicable to project certification) together with the sentence "the validity of the certificate will have to be checked on the site: <http://info.fsc.org>"; the issue/reissue/renewal number of the certificate;
- the signature of the authorized responsible of RINA Services;
- the following wording: "This certificate does not constitute evidence that a particular product supplied by the certificate holder is FSC (or FSC Controlled Wood) certified. The products offered, transported or sold by the certificate holder can be considered covered by the scope of the certificate only when the FSC declarations requested are clearly indicated on the invoices and transport documents";
- the registration code of the certificate issued.

The outcome of the decision is communicated to the applicant through the dispatch the communication of certification concluded and of the access to the "RINA member area", in order to download the certificate.

For group or multi-site certificates the certificate is issued to the certificate holder (group entity or central office) and a list of sites included in the certification scope is indicated directly on the certificate or, in the case of a high number of sites, in an enclosure.

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In the case of group or multi-site certification, RINA issues, at the request of the organisation, a sub-certificate for each site/participant covered by the group or multi-site certificate.

The sub-certificate makes clear reference to the group or multi-site certificate and has the same scope. The identification number assigned is linked to the main group or multi-site certificate number and will have a unique alphanumeric identifier for each participant.

RINA inserts each certificate together with the FSC license agreement and corresponding information in the FSC database (<http://info.fsc.org>) after the certification decision making entity has granted certification.

If it is not possible, due to malfunctioning of the FSC database, to make the on-line registration, RINA will inform ASI and FSC that certification or recertification has been granted within ten (10) days of the certification decision.

RINA updates the FSC database by uploading the updated certificates and reports of its clients.

The list of all FSC certified products is available on FSC database (<http://info.fsc.org>).

A copy of the certificates and of every other document proving the organisation's certification process, are kept by RINA for 7 years.

3.9 – SURVEILLANCE

Before undertaking the surveillance audit, RINA sends the client a simplified informative questionnaire for confirmation of the data acquired during first certification. The organisation is only required to send RINA the completed questionnaire if changes have been made compared to what was previously stated.

Any changes to the existing situation could necessitate a revision of the previously issued quotation.

The certificate is valid for five years. During this period, at least 4 annual surveillance audits will be performed, unless the FSC makes a request to increase the frequency of the surveillance audits.³

The frequency of surveillance audits could be higher depending on the following factors:

- the scale of the operation (e.g. the quantity of production in the case of a manufacturer, or the value and/or volume turnover in the case of a trader);
- the complexity of the chain of custody control system;

- result of risk assessment in the case of group certification;
- the ecological or social sensitivity of the resource base to management intervention;
- the experience and track record of the operators involved (managers and personnel, contractors);
- the number and nature of any non-conformities identified;
- the number and nature of any complaints submitted by stakeholders.

During the validity of the certificate, the organisation is required to inform RINA of any change in or addition of suppliers inserted in the reclaimed material suppliers audit program (application of the reclaimed material standard) and/or third parties.

In case of new high risk contractors, RINA will perform a supplementary on-site audit on a sample of them rounded to the next whole number ($Y = \sqrt{X}$) before their use by the organization.

As long as it hasn't been performed the on site audit on the contractors sampled, the organization cannot use the new communicated high risk contractors.

In the case of organisations which are not group or multi-site but which have several operational sites included in the scope of a single certificate, all the operational sites will be subject to an on-site audit without applying the sampling procedure.

The only exclusion are operational sites which do not physically possess FSC-certified materials or products and which do not label, modify, store or re-package products (i.e. sales offices or agents) for which the procedures described in the following apply.

For these organisations/operational sites, surveillance may also be undertaken simply at documental level, in lieu of the on-site audit.

In these cases, no more than two consecutive documental surveillance audits may be carried out.

Moreover, the organisation is required to sign a statement in which it declares that no material has been produced, labelled or sold as FSC-certified.

This statement is to contain an undertaking by the organisation to contact RINA when they decide they want to produce, label or sell FSC-certified material and an undertaking to maintain a Chain of Custody system during the period in question.

During the subsequent surveillance audit, RINA will assess all the records up to the previous audit so as to ensure that the system relevant to Chain

³ In the context of surveillance, "annually" is to be interpreted as follows: at least once per calendar year, but not later than 15 months after the last evaluation (determined by the date of the field visit or desk evaluation), just in the case there are no any NCs from the previous evaluation.

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of Custody has been maintained and that no material has been produced, labelled or sold as FSC-certified.

If an organisation does not produce, label, modify, store, package FSC certified products for two consecutive years, on expiry of the validity of the second annual surveillance, only documentary, the audit will be performed on site.

For operations or (sets of) sites that have not produced, labelled or sold any FSC-certified material since the previous audit, surveillance audits may be waived. However it shall not be waived more than two consecutive surveillance audits.

In general, during the surveillance audit, the audit team will check, in addition to the requirements specified for the main evaluation:

- any change in the certificate scope (new operations, new Participating Sites, change in business activities);
- changes in the Chain of Custody management system (for example, increase/reduction in the groups of products, increase/reduction in the applicable standards);
- FSC certified production and inventory records.

In case of Group or Multi-sites, for the inclusion of new Participating Sites, RINA divides the Participating Sites into two (2) sets of sites: Normal Risk Participating Sites and High Risk Participating Sites, which shall be sampled separately. The new additional sites that are being added to the scope of certificate shall be sampled separately by the other sites, using the following formula of the main evaluation:

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

where: y indicates the Number of the Participating Sites to be audited, rounded to the upper whole number, R indicates the Risk Index, N indicates the Number of new Normal Risk or High Risk Participating Sites to be added to the certificate scope.

If the Central Office wants to increase the number of Participating Sites in the certificate scope beyond the approved annual growth rate, RINA audits the Central Office and a sample of the new sites according the formula reported above ($y = R\sqrt{N}$) before the growth resumes.

In the audit for inclusion of new Participating Sites, RINA establishes a new growth limit for the period between the expansion of scope audit and the next evaluation.

New Participating Sites added to the certificate scope are considered certified after

RINA has added the new sites to the FSC database of registered certificates.

RINA enters new sites into the database within one (1) week from the date of receipt of the Central Office's audit report.

If new Participating Sites are being added to the scope of a Multi-site or Group certificate by the time of a surveillance evaluation or re-evaluation, they shall be considered as an independent set for the determination of the sample size, to be sampled according to the formula reported above ($y = R\sqrt{N}$).

After inclusion of new Participating Sites in the certificate scope, the new Participating Sites shall be added to the existing ones for determining the sample size for future surveillance evaluations or re-evaluations.

Participating sites which, since the last audit, have not physically possessed FSC-certified materials or products and which have not labelled, modified, stored or re-packaged products (i.e. sales offices or agents) are not included in the number of sites subject to sampling and for these, a documental analysis may simply be performed in lieu of the on-site audit.

The maximum number of new sites participating in group or multi-site certification at every annual audit is not to exceed 100% of the number of sites present during the first certification.

Where a certificate has twenty (20) or fewer Participating Sites at the time of the main evaluation, RINA may approve a growth rate higher than 100%, based on the demonstrated capacity of the Central Office to manage a higher number of Participating Sites.

Should the organisation wish to exceed this limit, a request is to be made to RINA for a new audit of the head office and of the new sites.

The head office is always subject to audit and is not included in the sites to be sampled.

The organisation undertakes to make available to the audit team:

- all the documentation (procedures, invoices, orders, etc.) and all other tools used to maintain the Chain of Custody system required to assess maintenance of the Chain of Custody system;
- the personnel to assist the team, access to the areas of process/activity/product included in the certification scope;
- access to the documentation, products and sites of any subcontractors.

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At the end of the audit, the organisation will be given a copy of the audit report containing any non conformities found and observations made (Report of Finding – RoF).

The organisation may express any reservations or comments it has regarding the non conformities or findings of the RINA auditors in the pertinent space in the audit report.

The contents of the report will subsequently be confirmed by RINA in writing.

If there is no written communication from RINA, the audit report is to be considered confirmed after 3 working days from delivery to the organisation.

After analysing the causes of any non conformity contained in the above-mentioned audit report, the organisation is to propose the necessary corrective actions to RINA and also the time required to implement them. Acceptance of these proposals will be communicated to the organisation by RINA.

Following the positive outcome of the on-site audit, the documentation produced by the audit team is submitted to independent technical review. The technical reviewer appointed to perform the final review of the documentation prepared by the audit team may request further clarification or modify the classification of one or more findings identified by the auditors. Should the decision be taken not to maintain the certificate, RINA will inform the organisation in writing, giving its reasons. The organisation will be required to pay for the audit activities contained in the accepted offer, even if the outcome of the surveillance activities is negative.

No certificate will be maintained until the organisation has proposed the corrective actions related to the non conformities identified and these corrective actions have been accepted by RINA.

The organisation has three (3) months in which to resolve any major non conformity; if they are not resolved in this period of time the certificate will immediately be suspended.

The certificate will also be suspended if 5 or more major NCs are found during a surveillance audit. The maximum period that a certificate may remain suspended is twelve (12) months (upon justification and at the discretion of the CB the timeline may be increased to eighteen (18) months to allow the client to correct nonconformities). After this period, the certificate shall be withdrawn, unless all major non-conformities have been successfully corrected and a surveillance audit was conducted in case the timeline of suspension exceeded twelve (12) months.

Five (5) or more Major Corrective Action Requests issued to the Central Office of a Group or Multi-site by RINA result in suspension of the entire certificate. Five (5) or more Major Corrective Action Requests issued to a Participating Site of a Group or Multi-site by RINA result in suspension of that particular Participating Site, but does not necessarily result in the suspension of the entire certificate. Non-conformities identified at the level of a Participating Site level may result in non-conformities at the Central Office level when the non-conformities are determined to be the result of the Central Office's performance.

A copy of the certificates and of all other documents confirming the organisation's certification process are kept by RINA for 7 years.

Once the ITR has been successfully completed, RINA sends to the company the final report.

In the case of a change to the field of application of the certificate, for example due to an increase/reduction in the groups of products and/or of the FSC Standards applied, RINA will re-issue the certificate with the appropriate amendments, following the positive result of the on-site surveillance audit and the positive outcome of the independent technical review.

3.10 – RENEWAL

For the certificate to remain valid, it must be renewed on expiry of its 5 years of validity.

The renewal audit is carried out in the same way as for the first certification audit and checks the same items which were audited during the first certification audit, in compliance with the reference FSC standard in force at the time of renewal.

The organisation is to define and RINA approve corrective action in relation to any non conformities found during the renewal audit before the certificate can be reissued.

3.11 – SUPPLEMENTARY AUDITS

The organisation is to inform RINA of any changes or need to extend the scope of its certificate.

A change of scope may be necessary as a result of changes in ownership, structure of the organization, or management systems.

Supplementary on-site audits may be performed in the following cases:

- verification of implementation of corrective action related to major NC within 3 months of the date when these NC were issued;
- extension of certification scope (in the case of new sites for group or multi-site

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certification, if in the opinion of RINA, the change requires significant changes to the group certification holder's management);

- pre-audit request to check whether the organisation is ready for the certification audit;
- an organisation which does not physically possess FSC-certified materials or products and which does not label, modify, store or repackage FSC-certified products (i.e. sales offices or agents), has notified RINA of its intention to start producing/labelling/modifying/storing/re-packaging FSC-certified products. In these cases, the audit will be made within 3 months of receipt of the notification, provided there are no NC concerning critical aspects found during first certification;
- an organisation which has obtained Chain of Custody certification, even if it does not physically possess FSC-certified material, notifies RINA that it has the availability of a stock of FSC-certified material or that it intends to produce FSC-certified material. In this case, RINA will carry out an on-site audit within 3 months of receipt of the notification, provided there are no NC concerning critical aspects found during first certification;
- On-site inspection of a sample rounded to the next whole number ($Y = \sqrt{X}$) of high risk contractors chosen among the new ones communicated by the Organization;
- any communications sent to RINA concerning non compliance by a certified organisation with one or more requirements of the FSC standard for Chain of Custody.

If the surveillance audit is due soon, any requests for change or extension of the scope can be dealt with at the time of that audit.

If, on the other hand, the request for certification scope extension includes new FSC-labelled products/materials, RINA reserves to evaluate if the situation is dealt with as a new certification.

A change in scope can only be made if it doesn't include or foresee an extension of the date of expiry of the certificate beyond the period of time for which it was originally issued.

RINA reserves the right to carry out an on-site audit before making a decision concerning the request for modification of the certificate scope. In particular for any changes for which is required supplementary audit by RINA, the organisation is not allowed to release certified products resulting

from such changes until RINA has notified the organisation accordingly.

If the audit is successful, RINA will modify the scope of the previously issued certificate, ask the organisation to destroy the copies of the previous certificate in its possession and will issue a new certificate.

3.12- MODIFICATION OF THE CONDITIONS OF ISSUE OF CERTIFICATION

If a new version of the applicable FSC standard is approved whose date of entry into force is before the next surveillance or renewal audit, this audit will be performed in compliance with the new standard.

3.13 – REVOCATION, SUSPENSION AND SURRENDER AND REINSTATEMENT

If, during a certification maintenance audit, one of the following situations arises:

- improper or misleading use or advertising by the organisation of the certificate obtained;
- the organisation hinders the performance of the audit;
- the organisation does not fulfil the financial commitments made at the time it stipulated the contract with RINA S.p.A.;
- identification of particularly serious NC;
- the organisation has not implemented corrective action, following major NC found, within the 3 months foreseen;
- major NC not resolved within 2 weeks related to missing valid document of agreement with FSC;
- 5 or more major NC issued during a surveillance audit;
- non payment of the specific fees and expenses by the set deadlines;
- Inability to take the decision about the maintenance of the certificate during the surveillance audit within three (3) months by the date of closure of surveillance audit;
- any other suspension of the certificate covered by the RINA general contract conditions;

the certificate will be suspended.

Suspension is notified to the organisation and to FSC by letter.

RINA informs the organisation that the certificate has been reduced, suspended or revoked within 30 days of the date of reduction, suspension or revocation.

If the certificate is reduced or suspended, the organisation has 6 months within which to implement the necessary CA and a

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supplementary audit will be carried out; if this audit is successful the reduction or suspension may be revoked.

If it is not possible to eliminate the causes leading to suspension of the certificate within 6 months, the certificate is revoked and its use prohibited.

In exceptional cases such as for example the inability to bear the audit cause of natural disaster, such as fires, floods, earthquake etc. the suspension can last 6 months till a maximum of 12 months.

During the suspension period of the validity of the certificate, the organization is requested to continue to pay to RINA the fee due to FSC (AAF). In case in which this fee will not be paid, RINA reserves the right to proceed to the immediate withdrawal of the certificate.

From the moment the certificate is suspended, revoked, expired, terminated the client must:

- immediately stop using any FSC trademarks on products and/or advertising material;
- immediately stop to sell any products that has been previously labelled or marked using FSC trademarks;
- immediately stop to make any claims that imply that the organisation comply with the requirements for certification;
- identify all pertinent clients and inform them of the suspension or revocation of the certificate within 3 working days of the suspension or revocation and maintain a copy of these communications;
- collaborate with RINA and FSC to enable them to check that the above-mentioned requirements have been met.

Furthermore, if the certificate is withdrawn, the organisation must:

- return the certificate to RINA and destroy all electronic and paper copies in its possession;
- remove, at its own expense, all FSC trademarks, FSC claims, RINA logo from every product, document, advertising material.

The decision to revoke the certificate and the reasons why are communicated to the organisation in question.

Moreover RINA has the right to suspend and/or withdraw its certification with immediate effect if, in the sole opinion of RINA, the client is not in conformance with the conditions specified for the maintenance of the certificate.

In case of allegation, the certification will be suspended only in the case of objective evidence.

The organisation may surrender its certificate at any time by notifying RINA SPA in writing.

In the case of certificate surrender, revocation or suspension, RINA updates the certificate status in the FSC database (<http://info.fsc.org>) as well as the pertinent date and reasons for suspension or revocation within 3 working days of the suspension or revocation.

If a certificate is revoked or has expired, the certified products which left the organisation while the certificate was still valid continue to remain certified even after the certificate has been revoked or has expired; on the other hand, products which have not yet left the certified organisation at the time of revocation or expiry of the certificate can no longer be considered certified products from that moment on.

RINA may reinstate certification after suspension if all major nonconformities have been corrected; and in cases where certification has been suspended for more than twelve (12) months, a surveillance audit has been conducted.

If certification is reinstated after suspension or if the certification scope is reduced as a condition of reinstatement, RINA makes all necessary modifications to formal certification documents, public information and authorizations for use of FSC trademarks.

3.14 – CERTIFICATE TRANSFER

The transfer of a certificate from another body to RINA is possible if:

- the organisation has a valid FSC certificate;
- the certificate has not been suspended;
- the certified activities come under the RINA accreditation scope;
- the organisation's certificate has been issued by an ASI accredited body.

FSC certificates cannot be transferred in the following cases:

- the certificate is suspended;
- major non conformities have not been closed (they are to be closed to the satisfaction of the previous certification body before the certificate can be transferred);
- the parties involved in the transfer cannot agree on the transfer date;
- the relevant documentation about the certificate holder (records, history of non

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conformities) has not been made available to RINA.

If an organisation wants its certificate recognised by RINA it must send it the informative questionnaire and related request, as described in chapter 3, together with:

- a copy of the communication regarding the date agreed with the previous certification body and certificate holder;
- last audit report of the previous certification body with any minor non conformities and/or recommendations; ;
- any ASI surveillance or spot audits regarding the organisation whose certificate is to be transferred;
- five year audit programme or if it's not available, the information about the planned date related to the next scheduled audit to be performed (for example information inserted in the audit report of the previous certification body);

On the basis of the documentation received, RINA will carry out a surveillance audit in accordance with the requirements of paragraph 3.9 of these Rules within 3 months of the agreed transfer date. This audit will include a review of all pending minor non conformities issued by the previous certification body.

The certificate can only be transferred once during the five-year validity of the certificate.

If an organisation has already changed certification body at least once in the five-year period of validity of the certificate, RINA accepts the client only when the previous certificate is terminated and will carry out an audit according to the requirements of a first certification, as described in chapter 3 of these Rules.

The period of validity of the certificate cannot exceed five years. Therefore, the expiry date of the succeeding certificate is to be the same as the expiry date of the previous certificate.

However, if the transfer audit is conducted in a way that satisfies all the formal requirements for a first certification, a new five-year certificate may be issued.

The scope of the succeeding certificate is to be the same as the scope of the previous certificate. If a change in certificate scope is requested, RINA will assess the request on a case by case basis.

If the outcome of the surveillance audit is negative, due to non closure of the minor non

conformities issued by the previous certification body or to the issue of major non conformities, a supplementary audit will be carried out in accordance with the requirements of paragraph 3.11 of these Rules.

The holder of an active certificate (not suspended, withdrawn, terminated or expired) should inform their current certification body that they are applying for a certificate transfer to another certification body.

CHAPTER 4 – USE OF THE FSC® TRADEMARKS

The FSC logo, the acronym FSC, the name "Forest Stewardship Council®", the 'Forests For All Forever' – full mark, the 'Forests For All Forever' – logo with text mark are registered trademarks pertaining to the Forest Stewardship Council A.C. (FSC).

The FSC logo may be used on advertising material and products, with the limitations, specifications and graphic layout defined in the FSC reference standard.

The right to use the logo, the registered trademarks and FSC labels is given by RINA following chain of custody certification and a valid FSC trademark license agreement.

The FSC trademark license code assigned by FSC to the Organization shall accompany any use of the FSC trademarks. It is sufficient to show the code once per product or promotional material. In that regard the Organisation shall either have an approved trademark use management system in place or submit all intended uses of FSC trademarks to RINA for approval.

The missing approval request involves the release of a NC.

If the Organization has not a trademark use management system in place, it is request to send to RINA to the mail box FSC.trademarksuse@rina.org and by e-mail to local scheme responsible the following documents for appropriate control and approval:

- facsimile of use of the FSC trademarks on promotional artwork (with a facsimile for each type of promotional artwork support, such as website, email, invoice and so on, giving size, colour and placement on the material);
- photo of the products for which FSC certification has been requested indicating how the FSC trademarks and labels will be used on the products (size, colour, placement on the product);

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The organisation may not use the logo, registered trademarks and FSC labels until it has obtained RINA approval.

The approval for using logo, trademarks and/or FSC labels has to be stored for at least 5 years by the Organization.

Organisations which demonstrate, during subsequent surveillance audits, that they use the FSC label correctly do not need to request approval of labels for the same type of product or in the same position on the product or for repeated use on advertising material.

All new reproductions of the FSC trademarks, alternative layouts to those foreseen by the label generator for graphics and texts, use of a clear background for labels, use of a new word added to the label text are to be sent to the certification body for approval to the mail box: FSC.trademarksuse@rina.org and to local scheme responsible by e-mail.

If none of the options indicated in the FSC reference standard for product labelling apply due to lack of space or type of product or in the case of requests for new translations, additional information or different wording on advertising panels, the organisation is to propose a solution to RINA which will forward it to the FSC trademark unit for approval.

Furthermore, if in exceptional circumstances none of the colourimetric options for the label are possible, the organisation may propose its own solution to RINA, specific to its situation. RINA will send the proposal to the FSC Trademark Unit for appropriate assessment.

If the Organization implements a trademark use management system with an internal control system, the system shall be approved by the certification body before the organization may start using it. Prior to use of an internal control system, the Organization shall demonstrate a good understanding of the requirements in question by submitting a sufficient number of consecutive correct approval requests for each type of intended use to RINA through the email FSC.trademarksuse@rina.org and the local scheme responsible.

It is at the discretion of RINA, in the person of the Scheme Manager, to determine when the organization has demonstrated a good record of submissions.

If the Organization demonstrates consistent failure to control its FSC trademark use, RINA may request that all trademark use be submitted for approval by them prior to use.

The name "Forest Stewardship Council" cannot be translated. The FSC labels and promotional statements could be translated into other

languages where necessary. Each new translation is to be sent to the FSC for approval.

In the case of organisations which only market FSC-certified products, they must request and obtain from their suppliers the authorisation to advertise and use the FSC logo and corresponding registration number.

In the case of FSC project certification, the logo may only be used for partial projects or complete registered projects and not for registered candidate projects.

An organisation is authorised to promote its products even after its certificate has been suspended or revoked provided the products being promoted are those sold by the organisation before the date its certificate was suspended or revoked.

For group or multi-site organisations, the group entity or central office is responsible for the proper use of the FSC trademarks on any promotional material produced by individual members included in the group or multi-site FSC certificate scope.

The group entity, which held the certificate, can license all members of the group to use FSC trademarks under specific conditions, but the group entity cannot issue sub-licenses for use of the FSC trademarks.

CHAPTER 5 - RESPONSIBILITY

The organisation undertakes to make available to the RINA personnel all the documentation requested to assess the chain of custody system.

RINA is the sole responsible for decisions of granting, maintaining, extending, suspending and withdrawing of the certification.

RINA is not liable for incomplete, unsorted or untruthful documentation.

RINA checks the soundness of the system to manage and keep under control the aspects linked to the chain of custody of forestry materials/products in accordance with the FSC requirements but does not enter into the merits of the technological solutions adopted.

Certification does not cover compliance with the legal requirements applicable to the products, processes or services provided and does not exonerate the organisation from fulfilling them. Therefore, this certification absolves RINA from all liability and obligation to ensure compliance with any law applicable to the product/process provided by the organisation.

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RINA cannot be held liable for the supply of defective products to third parties nor for behaviour of the organisation, whether sporadic or continuous, which is not in line with the law and/or rules as well as for any damage associated with this behaviour.

CHAPTER 6 – RIGHTS AND DUTIES OF THE CERTIFIED ORGANISATION

6.1

The organisation has the right to advertise the fact it has obtained FSC certification, always in compliance with the method of use of the logo, as established in the FSC standard and in these Rules.

6.2

The organisation must:

- conform with all applicable certification requirements;
- conform with any conditions set by RINA for granting or maintaining certification;
- disclose current or previous application or certification with FSC and/or other forestry certification schemes in the last five years;
- agrees to the conduct of evaluations at the required intervals, as determined by RINA, including the RINA's right to carry out unannounced or short notice audits;
- agree to witness audits of ASI;
- agree, that specified information is published, as indicated in the applicable FSC normative documents;
- make reference to the most recent versions of the rules and the FSC certification standards (available at site <https://ic.fsc.org/en>) as an integral part of the contract;
- guarantee the rights of the certification body, ASI and FSC to access confidential information, examine documentation deemed necessary, and access to the relevant equipment, location(s), area(s), personnel, and bodies providing outsourced services to clients;
- holds a valid and most recent version of the 'License Agreement for the FSC Certification Scheme', where the right to use the FSC trademarks is not suspended;
- consider the participation of observers as specified in the FSC normative documents;
- agree, that a complaint is first handled according to the RINA's dispute resolution procedure and if not resolved referred to ASI and ultimately to FSC, in case of disagreement with audit findings related to FSC normative documents;
- making claims regarding certification consistent with the scope of certification and not making any claims of conformity (or near conformity) with FSC certification requirements until and unless certification is granted;
- not use its certification in such a manner as to bring the RINA, FSC or ASI into disrepute and not make any statement regarding its certification that may be considered misleading or unauthorized;
- keep a record of all complaints made known to it relating to conformity with certification requirements and make these records available to RINA when requested, and:
- take appropriate action with respect to such complaints and any deficiencies found in products that affect conformity with FSC certification requirements;
- document the actions taken;
- inform RINA within ten (10) business days of any changes in the management ownership, structure of the organization, certified management systems or circumstances which relate to the implementation of FSC certification requirements or the condition of the resources which could adversely impact upon keeping the validity of the certification;
- agree, that in case of reduction, suspension or withdrawal of the scope of RINA's FSC accreditation, the certification of the affected clients will be suspended within six (6) months after the date of reduction, suspension or withdrawal of the respective scope of FSC accreditation;
- guarantee the rights of RINA to use the information for checking any breaches of the FSC trademark or the intellectual property rights of FSC;
- not use certification on products which have not been certified or which may lead to such an inference;
- use FSC trademarks and FSC claims only in respect of the scope for which certification has been granted;
- use certification only to indicate that products are certified as being in conformity with specified standards;
- endeavour to ensure that no certificate or report not any part thereof is used in a misleading manner;
- not transfer the certificate acquired except in cases where the organisation could be transferred or transformed. In this

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- case, the organisation undertakes to promptly inform RINA which takes note after checking that no changes to the chain of custody control system have been made;
- maintain its custody system active during the period of validity of the certificate;
 - use the FSC logo, trademarks and claims correctly, according to the requirements for use specified in these Rules and in the FSC reference standards;
 - inform RINA of any changes to the organisation (company management, human resources, production processes, new contractors (name and address) involved in processing of FSC products, etc.);
 - not use new contractors communicated to RINA as long as RINA has evaluated their class of risk (high or low) and has performed a supplementary audit on a sample of high risk contractors;
 - provide adequate assistance to the audit team during the first certification audit and during subsequent maintenance audits, also allowing access to premises and offices and production sites subject to audit;
 - implement the CA proposed in relation to the NC found during the audits within the time limits established in these Rules and by the requirements of the FSC reference standard;
 - allow access to the sites and to the confidential information (also of subcontractors) to the authorised representatives of the accreditation bodies and FSC;
 - Continues to pay all specified fees and costs in a timely manner;
 - pay the contractually fixed fees even if the certificate is not issued or it is withdrawn or suspended;
 - agrees that RINA is not obliged to grant or maintain certification, if activities of the client conflict with the obligations of RINA as specified in its accreditation contract with ASI, or which, in the sole opinion of RINA, reflect badly on the good name of RINA;
 - agrees, that RINA and FSC have the right to revise the requirements of certification within the period of validity of the certification, including the revision of costs and fees;
 - in case of multi-site or group organisation:
 - o the group entity or the central office shall not issue any self-made certificates or declarations
- to their participants that could be mistaken as formal FSC certificates;
- o the group entity or the central office shall be fully responsible for paying all the costs of evaluation and monitoring throughout the period of validity of the certificate;
- bring its chain of custody system into line with any amendments to the reference standards/RINA Rules according to the time frame established in these Rules;
 - guarantee the safety of RINA auditors during the on-site inspection audit;
 - notify to RINA any detecting of non-conforming products delivered to customers and cooperate with RINA in order to allow the certification body itself to confirm that appropriate action is taken to correct this non-compliance;
 - disclose current or previous applications or certifications with FSC or other forestry certification schemes in the last five (5) years;
 - comply with the relevant provisions which guarantee FSC's full intellectual property rights;
 - guarantee that FSC continues to keep its intellectual property rights;
 - ensure that nothing is considered to entitle a customer to use or have used any of the intellectual property rights.

CHAPTER 7 – AMENDMENTS TO THE STANDARDS

7.1

RINA has to inform its affected client organisations of all important amendments/updates to the chain of custody reference standards, specifying the action to be taken and the time within which it is to be implemented.

If the changes to the certification requirements are linked to the issue of a new reference standard rather than to changes to these Rules, the organisation will be informed within thirty (30) days of approval of the changes made.

The organisation can decide to comply with the new requirements or to relinquish its certificate, informing RINA accordingly.

Following the entry into force of a new edition of the applicable reference standard, audits will be undertaken according to the latest approved valid version.

CHAPTER 8 – PROJECT CERTIFICATION

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Project certification is issued once for a single project, on completion of the project.

The project certificate has no expiry date and is issued for that particular project.

Examples of projects can be the construction of a floor or restoration of a roof using FSC certified wood, more in general any activity involving the use of FSC® certified forestry materials/products for construction and/or recycled after use.

The project can be certified as "FSC full" or "FSC partial", depending on whether:

- only some materials/products in FSC 100% and/or FSC Mix (FSC partial) have been used;
- all materials/products in FSC certified (FSC 100% and/or FSC Mix) have been used, reclaimed after use, recycled in another way or FSC controlled (full FSC).

A detailed project plan is to be provided to RINA which identifies:

- the specifications (including the product, species, FSC status (FSC 100%, FSC Mix, post-consumer reclaimed, other reclaimed or FSC Controlled);
- the quantity (i.e. volume or dimension);
- the cost of the forestry products/materials indicated in the project (i.e. including the wood used for bracing, form boards, etc.).

It is also possible to approve projects for FSC® certification candidature provided the reference standard requirements for project certification are complied with. In this case, only a registration number is issued without the certificate.

For partial or full FSC projects finalised, for which RINA has checked compliance with all the requirements of the reference standard, an FSC® project certificate is issued containing the certification scope (partial or full project).

The owner of the project or the project manager can make promotional FSC claims, subject to approval by RINA, provided they only concern the project and only after obtaining project certification.

In relation to project certification, RINA will undertake a document review and subsequent on-site audit aimed at checking compliance with what is stated in the project document.

In order to perform the document review, the organisation must send RINA a detailed project plan containing:

- a description of the project;

- species, FSC certification status for each forestry product used;
- quantity (volume or dimension) and cost of the forestry products/materials specified for the project.

The use of promotional FSC claims must comply with the requirements of the reference standard and must always contain information relevant to the year in which the project certificate was issued and its corresponding registration code.

FSC promotional claims can be affixed directly on the certified product but use of FSC trademarks on stationery is not allowed.

If the final project owner wishes to make FSC promotional claims about the certified project, a formal document (i.e. a signed declaration) is to be sent by the project certificate holder to RINA containing:

- date of the document;
- certificate registration code;
- scope of the certificate;
- year in which the certificate was issued.

Use of the FSC label is authorised by RINA, always accompanied by an appropriate FSC promotional claim and can only be granted to project owners/managers of a project which has obtained full or partial project certification.

If the final project owner wishes to use FSC trademarks, a request is to be made to the FSC nominated agent.

For renovations or changes to a previously FSC-certified project, a new project is to be submitted with a new applicant project registration code.

CHAPTER 9 – NON-CERTIFIED RECLAIMED MATERIAL

The organisation that purchases reclaimed forest-based materials (including bamboo and cork) without FSC claims shall demonstrate that its reclaimed inputs for use in FSC Product Group or FSC Projects comply with FSC definitions for pre-consumer and/or post-consumer reclaimed material.

For this purpose, the organisation has to have conducted a validation process for its suppliers of reclaimed materials to determine whether the materials supplied are eligible to enter into FSC product groups. In details:

- for each supplier the organisation has to have maintained records and defined the necessary documentation evidence and actions to demonstrate that materials purchased comply with FSC definitions for pre-consumer and post-consumer reclaimed material, including:

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- o the name and address of the supplier;
 - o supplier activity (e.g. purchaser/collector from point of reclamation, trader);
 - o the reclaimed material categories to be supplied;
 - o the level of control required (e.g. visual inspection upon receipt, supplier audits);
- the organisation has to monitor the conformance of suppliers in relation to the FSC definitions and purchase specifications and have a contingency plan to cater for non-conforming material or supply documentation. (e.g. request correction of purchasing documents, temporary or permanent invalidation of the supplier, classify the material as non-eligible input for FSC products);
- upon receipt, the organisation has to verify all the reclaimed materials through visual inspection and classified into pre-consumer and/or post-consumer reclaimed material;
- the organisation has to retain objective evidence for each supply confirming that the reclaimed materials comply with FSC definitions for pre-consumer and post-consumer (could be material samples, pictures, quality analysis report, invoices, delivery notes or shipping documents etc.);
- the organisation has to have implemented a "Supplier Audit Program" including all the suppliers for which the classification of reclaimed materials as pre-consumer and/or post-consumer cannot be demonstrated through objective evidence upon receipt;
- in case the material received does not comply with purchase specifications and/or the quantities informed in the invoices are not correct, the organisation has to carry out immediate follow-up actions to correct the deviation (as per point 2 above)⁴;
- In case where the material received contains a mix of pre-consumer and post-consumer reclaimed material in its composition, the organisation has to apply one of the following measures:
 - o classified the full amount of material as pre-consumer reclaimed or
 - o analysed and confirmed the quantities of pre-consumer and post-consumer material in the mix received. In this case, the organisation has to:
 - i. have kept a written declaration by the supplier about the quantities of pre-consumer and post-consumer reclaimed material in each material mix supplied and
 - ii. have included the supplier inside the "Supplier Audit Program".
- the organisation has to have performed regular (at least annual) on-site audits of the suppliers included in the Supplier Audit Program (including overseas suppliers) based on a sampling approach;
- the minimum number of suppliers to be audited per year is as follows: the size of the sample is the square root's number of suppliers (x) with 0.8 as a coefficient ($y = 0.8 \sqrt{x}$, where "y" is the number of suppliers to be audited), rounded to the upper whole number;
- the sample of supplier selected by the organisation is alternating and representative in terms of their:
 - o geographic distribution;
 - o activities and/or products;
 - o sizes and/or annual production.
- in cases where the supplier selected for sampling sells reclaimed materials that were previously collected, classified and traded by other companies or sites, the complete supply chain of these materials has to have been audited back to the point where the classification as pre-consumer and/or post-consumer can be demonstrated through objective evidences;
- the organisation for the suppliers sampled inside the "Supplier Audit Program" has to have evaluated and verified the documents and other evidence regarding the supplied material quantity, quality and compliance with FSC definitions of pre-consumer and post-consumer material which includes:
 - o supplier's instructions or procedures in place to control and classify the reclaimed materials;
 - o when applicable, trainings or instructions provided to the

⁴ The follow-up actions have to be recorded by the organisation and the organisation has to communicate them to RINA during the annual audits

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- supplier's personnel in relation to classification and control of reclaimed materials;
- o registers that demonstrates the origin of the materials⁵ (e.g. pictures, address of the demolished house, invoices, etc.)
- the organisation has to have documented the supplier audits, including a record of the audit date, the audit findings in relation to the requirements at point 5 above, the names and qualifications of the auditors and examples of any evidence collected to verify the classification of the materials.

The organisation has the possibility to perform a desk audits (remote audits) for traders or sales offices that do not take physical possession of reclaimed materials, and will not alter, store or re-package the reclaimed materials. Moreover, the organisation could have contracted an accredited certification body or other external qualified party to carry out the supplier audits.

RINA will check:

- the effectiveness of distinction and control of the suppliers of pre-consumer and post-consumer reclaimed materials and any other prescription requested by standard FSC-STD-40-007;
- The performing of the audits carried out to the supplier by the Organisation and their effectiveness;
- as a minimum a sample on the basis of the following formula: $y = 0.8 \sqrt{x}$, where y is the number of supplier to be audited, rounded to the upper whole number, x is the number of suppliers audited by the Participating Sites in the current evaluation period.

CHAPTER 10 – FSC CONTROLLED WOOD

RINA is not accredited for the FSC Controlled Wood.

CHAPTER 11 – TRANSACTION VERIFICATION

The organization shall support transaction verification activities conducted by ASI through RINA, providing data samples on FSC transactions as requested by RINA according to the timing of the flow chart shown in Annex 1.

CHAPTER 12 – APPEALS, COMPLAINTS, DISPUTES

12.1

The organisation may appeal against the decisions made by RINA, explaining their reasons, within 30 days of the date of notification of the decision.

RINA keeps you informed of progress in evaluating the complaint/appeal, will investigate the allegations and specified all its proposed actions in response to the complaint or appeal within three months of receiving the complaint or appeal.

Further information are available on the document "How to submit complaints, observation and appeals related to the certification of Chain of Custody of forestry products FSC" downloadable on RINA web site at FSC page.

12.2

All expenses related to the appeal will be charged to the organisation except in cases of recognised good grounds to the contrary.

CHAPTER 13 – CONTRACTUAL CONDITIONS

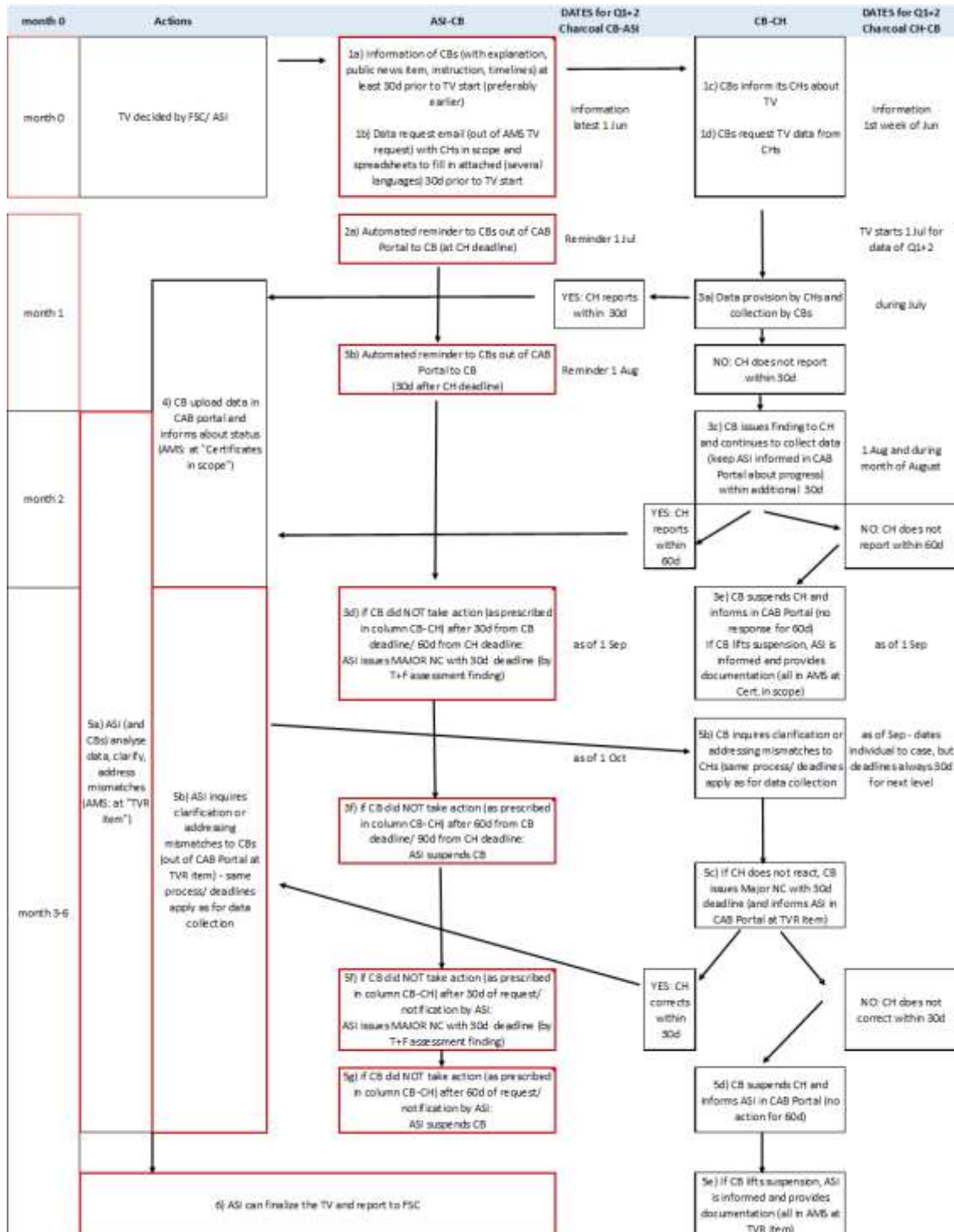
Reference is to be made to the document "General contract conditions for the certification of systems, products and personnel" in its current edition, which can be downloaded from the site www.rina.org, for what concerns the contractual conditions.

⁵ A declaration from the supplier, even if part of the contractual agreement, is not considered sufficient proof of the origin and material category. However, it can be used as additional evidence to demonstrate the material compliance with FSC® definitions.

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ANNEX 1 – TRANSACTION VERIFICATION FLOW CHART

Flow Chart for Transaction Verification with Timelines - proposal by ASI, shared & discussed with CBs, Status 31May18.



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Technical Rules