

Final guidance on the PEFC Chain of Custody requirements

NEPCON CLIENT UPDATE AUGUST 2014

PEFC has released the final version of its guidance on the PEFC Chain of Custody Standard PEFC ST 2002:2013. It includes several important amendments and interpretations.

Below, we are presenting a summary of the changes compared to the draft version of the guidance. Many PEFC chain of custody (COC) certificate holders have been following the draft guidance.

- The Due Diligence System (DDS) steps for material delivered with the PEFC claims *x% PEFC Certified* and *PEFC Controlled Sources* are described more clearly.

The guidance makes clear that you are required to gather information (point 5.2 in the PEFC CoC standard) and to address substantiated comments or concern (point 5.3) for such material. For example, if you receive any substantiated concerns about *x% PEFC certified* or *PEFC Controlled Sources* material, you must conduct a risk assessment according to the standard's point 5.3. Only if you can conclude that the certified material is low risk, it can be used as certified for PEFC CoC.

Note: The guidance includes updated illustrations of the steps and material flow (figure 3 and 4 in the guidance document).

- Different PEFC DDS requirements are applicable for different material categories:

	Recycled material	CITES species accompanied with required licenses	X% PEFC Certified material	PEFC Controlled Sources material	All other forest based material
5.2 Gathering information	NO	NO	YES	YES	YES
5.4 Substantiated comments or concerns	NO	NO	YES	YES	YES
5.3 Risk assessment	NO	NO	Only in case of substantiated concerns	Only in case of substantiated concerns	YES
5.5 Management of significant risk supplies	NO	NO	Only in case of substantiated concerns	Only in case of substantiated concerns	YES

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- **PEFC Controlled Sources claims on sales documents.** The guidance specifies that if you follow the average percentage method, you can use the x% PEFC Certified claim for sale, however you have the additional option of using the PEFC Controlled Sources claim instead. If you are using the volume credit method, you can use x% PEFC Certified claim for the available credit amount and include the PEFC Controlled Sources claim for the remaining part of your production volume.
- **Suppliers' self-declaration:** The self-declaration is no longer mandatory, however the new guidance encourages you to use it as a due diligence tool and presents elements of a typical self-declaration for your inspiration.
- **Communication of claims:** The guidance specifies that "PEFC allows the use of double claims. That means the PEFC claim can be combined with a claim of another forest certification scheme for a specific delivery".

In several places, "has to" or "shall" has been replaced with "should". For example, in relation to gathering information the draft guidance said: *"The organisation shall have at least a procedure in place that enables them to get the information from its supplier when needed. The procedure has to be coordinated with and confirmed by the supplier. The procedure and the confirmation shall be documented"*.

In the final guidance, this is replaced by the following language: *"The organisation should have at least a procedure in place that enables them to get the information from its supplier when needed. The procedure should be coordinated with and confirmed by the supplier. The procedure and the confirmation should be documented."*

We are seeking clarification on which parts of the guidance are mandatory and which is to be understood as recommendations.

- The final guidance includes new tables with examples of material category identification – how materials are divided into certified, neutral and other categories. See table 2 in the guidance for the physical separation method and table 8 for the percentage based method.

Note: The chain of custody Standard's risk assessment table 2 lists indicators for "high" likelihood on origin level, including the following indicator: "Tree species included in the material/product is known as species with prevalence of activities covered by the term controversial sources". PEFC had informed that the amended guidance would include references and examples clarifying this indicator, however unfortunately this is not the case in the final guidance.

[View the final PEFC guidance](#)