

PRA-23

# Prepare for FSC<sup>™</sup> Chain of Custody certification

NEPCon Client Guide

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## About this guide

This guide is for companies about to develop a chain of custody system as the next step in their FSC certification process. It is based on both the FSC requirements and NEPCon's practice of good customer service. Note: Read this only after you have chosen a chain of custody system and decided on the scope of your certificate. You can find basic information in our info guide "Nuts & bolts of FSC chain of custody certification".

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Please send your questions, comments, and suggestions for improvements to us at info@nepcon.net.

## 1: How to prepare for certification

We recommend that you appoint an in-house coordinator, even if you are using an external consultant to help you. The coordinator should read the relevant parts of the FSC Chain of Custody standard (see below) as well as manage and monitor the certification process. This will help you build valuable in-house competence.

In order to be ready for certification, the following needs to be in place:

- A A chain of custody procedure that describes how you will meet all relevant FSC requirements for material control and quality management.
- B Additional documentation: 1 Signed declaration concerning "FSC Policy of Association". 2. Documentation of employee training 3. List of verified FSC suppliers, and 4. FSC product group list.

This is the minimum which is required from all certificate holders. Further documentation may be required, if you for instance outsource all or part of your FSC production.

- C Clear division of roles and responsibilities, which ensures full and correct implementation of your chain of custody system. All relevant staff must be instructed in and understand the part of the procedure that they need to implement.
- D A safety representative needs to be appointed, and a procedure for work environment must be in place. All employees must be instructed about work environment.

The aspects listed above will be presented in more detail in the following sections, along with tips on how to address each topic.

#### An effective preparation process typically involves the following steps:



Minimum one person in your company studies the certification requirements.



You establish a written chain of custody procedure and the relevant appendices (see below).

You submit your chain of custody procedure and other documentation to NEPCon for review well in advance of your main evaluation. Note: our quality control may give rise to adjustments of the procedure or the related documentation.



When you have a final procedure in place, you train all relevant staff so that every employee knows exactly what his or her role, responsibilities and duties are in relation to the certification requirements. You must provide evidence of the executed training to NEPCon prior to the main evaluation.

Now you are ready for the main evaluation, which, with a few exceptions, involves a certification visit at your site.

NOTE: Learn more about the certification process in our information guide "Nuts & Bolts of FSC Chain of Custody certification".

## 2: The certification requirements

The certification is based on the FSC chain of custody standard FSC STD-40-004 V2-1. The following sections of the standard is key when you are preparing for certification:

- Part I (sections 1-6).
- Select the relevant sections of part II, depending on the selected chain of custody system (transfer, credit or percentage).
- In Part III, section 10-11 is relevant if you want to use the FSC trademarks.
- Part IV, section 13 is relevant if you want to outsource the handling of FSC products.

[The official version of the text is the English-language standard published by FSC. However, NEPCon has prepared an unofficial translation, which can be used to create an overview, if you prefer to read the standard in Danish].

The standard FSC-STD-50-001 regulates the use of the FSC trademarks on-product and off-product and is relevant to the vast majority of chain of custody certified companies. NEPCon's certification toolkit contains a guide on trademark usage, which gives an overview of the trademark rules.

A number of other FSC standards, policies and regulations can come into play, depending on the exact scope of your company's certificate. A list of the most widely used standards is included in Appendix 1.

#### Familiarise yourself with the requirements

Certification standards are similar to legal papers: They are difficult to understand unless you happen to be a lawyer. The list of requirements may seem rather overwhelming at first sight.

However, you do not need to know the standard by heart in order to be certified. Some sections may not even be relevant for your company.

We recommend you to start by gaining an overview of the standards that apply to you. You can use them for reference as you work through your procedure. Please contact us if you are unsure about the meaning of a requirement or whether it applies to you

#### Stay on top of the rules

The FSC system is very dynamic, and there are system changes from time to time. As our FSC client you wil receive system updates and reminders about deadlines for compliance directly in your inbox. We also inform about important system changes in our free e-newsletter 'Certified Wood Update'.

## 3: The chain of custody procedure

Your chain of custody procedure shall include all relevant parts of your production, storage and trading processes. Below is a brief description of key aspects:

- Responsibility: Clear definition of responsibilities for certification and chain of custody, which includes all parts of the FSC standard.
- Training: Training plan and records of completed training.
- Documentation: All relevant documentation must be kept on record for at least five years. This
  includes invoices (both in and out), documentation concerning transportation (both in and out), staff
  training, volume summaries and the like.
- Defining the scope of the certificate: What types of certified products will be purchased, produced and sold (eg. FSC 100%, FSC Mix XX% or FSC Mix Credit)
- Verification of supplier: Suppliers of FSC material must have a valid FSC chain of custody certificate, and the materials you buy must be sold as certified.
- Separation of certified material: Material that is not certified must be separated from certified material (only applicable when using the transfer system).
- Volume Control: The balance of materials must be documented (e.g. how much is purchased, the quantity used in the production, wastage)
- Credit account: In order to keep track of FSC credits available for FSC production, a credit account must be implemented (only applicable when using the credit system).
- Invoices and shipping documents: Once certified products are sold, the correct information must appear on invoices and shipping documents
- Outsourcing: Special rules apply for outsourcing certified processes.
- Use of FSC labels: Proper use of trademarks must be ensured. If you want to use Rainforest Alliance's trademarks, these must be addressed.

#### Gain inspiration from NEPCon's certification toolkit

Our certification toolkit includes a classic example of a chain of custody procedure for the fictional company "Green Saw", covering the requirements that typically apply to the transfer system. It provides inspiration on how a chain of custody procedure can be structured in order to be operational, comply with relevant FSC requirements and be easy to update. Forms and templates for creating the most common appendices are included in the toolkit as well.

## 4: Further documentation

Below is an overview of the types of documentation that should be available during FSC chain of custody audits, either as separate documents or as appendices to your chain of custody procedure.

#### **Policy of Association**

The FSC Policy of Association is a statement which FSC requires certificate holders to sign, to prevent FSC from association with organisations that violate FSC's core values.

#### List of trained staff

You must prove that all relevant staff has received the relevant training. A simple way to do this is to create a document, which employees sign once they have received the training/instructions.

#### **FSC Product Group List**

A list of FSC product groups is a key tool in your chain of custody system and the auditing process. The list may include one or more product groups where the products in each group are similar with regard to FSC product type, FSC claims used for output products, wood species, FSC claims used for input material, conversion factor and selected chain of custody system.

We recommend using the following reference documents:

- FSC list of product types (FSC-STD-40-004a-V 2.0)
- For the specification of tree species, FSC recommends to use the FSC Germplasm Resources Information Network (GRIN) Taxonomy Species Online Database, which you can find here: www.arsgrin.gov/cgibin/.

Note: NEPCon's certification toolkit includes a template for creating a product group list.

#### **Supplier List**

To avoid errors and fraud, FSC requires that suppliers of FSC materials be regularly checked through the FSC database **info.fsc.org.** Here you can search for a particular supplier by its name or certification code.

- Once the supplier is displayed in the search results, click on the name and the database gives you a page with information about the supplier.
- The name and certification or licence code of the supplier entered into the database must match what appears on your purchase invoice and delivery notes, when relevant.
- Select the tab 'product data'; here you get all the information you need in order to verify that the supplier's certificate covers exactly the FSC products with exactly the FSC claim that you buy.

At the main evaluation, you shall be able to produce an updated list of verified FSC-certified suppliers of input to your FSC-production, where you have completed the above exercise for each supplier.

Note: NEPCon's certification toolkit includes a template for developing an FSC supplier list.

### 6: Special conditions

Special circumstances that are important to take into account as you prepare for certification, and which have not been covered by this guide, may be relevant. As a part of your dialogue with NEPCon you will be informed whether or not you have conditions that go beyond the scope of this guide. Below we have listed the most common examples of conditions that will often cause changes to your preparation process.

#### **Special types of certificates**

If you have chosen a special type of certification, such as COC/Controlled Wood certification, multi-site, group certification or project certification for construction projects, you must expect that your preparation process will often involve a few more steps than those outlined here.

However, group certification also relieves you of some tasks. For example, you do not need to develop and maintain a chain of custody procedure, but will just follow the procedure maintained by the group manager.

#### Outsourcing

When outsourcing certified processes, special rules apply. Your chain of custody procedures must reflect this reality, and separate agreements with each subcontractor must be in place.

Note: You can find guidance and examples in NEPCon's guide to outsourcing of FSC production.





## About NEPCon

NEPCon is an international, non-profit organisation that works to ensure responsible use of natural resources and secure sustainable livelihoods worldwide.

Through certification services and innovation projects, we help other organisations become part of the solution to some of the world's greatest challenges including global deforestation, climate change and biodiversity loss.

NEPCon manages the Rainforest Alliance's forest certification programme in Europe, Russia, Turkey and Israel, and we offer FSC evaluations under Rainforest Alliance's FSC accreditation.



The mark of responsible forestry

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