



Specific Regulations for the AENOR Chain of Custody Certification according to the Forest Stewardship Council®

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1 Objective

This Particular Regulation describes, in compliance with section 3.2 of the General Regulations on Certificates of Conformity (hereinafter the General Regulations), AENOR's particular assessment system in accordance with the Forest Stewardship Council® (hereinafter FSC®) standards for the Chain of Custody of forest products (hereinafter CoC).

2 Reference documentation

- FSC-STD-20-001 General requirements for FSC-accredited certification bodies
- FSC-STD-20-011 Chain of Custody Assessments.
- FSC-STD-40-003 Multi-Site Chain of Custody Certification.
- FSC-STD-40-004 FSC Standard for Chain of Custody Certification.
- FSC-DIR-40-004 Chain of Custody Certification Directive.
- FSC-STD-40-004a Addendum to the FSC-STD-40-004 standard: Classification of FSC products.
- FSC-STD-40-005 FSC Standard for evaluation by controlled wood companies.
- FSC-DIR-40-005 FSC Controlled Wood Certification Directive.
- FSC-STD-40-006 FSC CoC Standard for Project Certification.
- FSC-STD-40-007 Standard for the use of recovered material in FSC product groups and certified projects.
- FSC-STD-50-001 Requirements for the use of FSC trademarks by certified companies.

Current editions of the above standards, as well as other applicable standards, should be consulted in www.fsc.org.

FSC frequently publishes notes or advice called *Advice Notes*, which complement the requirements set out in FSC standards and procedures. *Advice Notes* are generally grouped into Policies for later publication. These *Advice Notes* are applicable from their date of publication (unless otherwise indicated) and can be consulted in www.fsc.org.

In addition, FSC publishes interpretations of the requirements that it publishes in <https://ic.fsc.org>. Any interpretation of FSC requirements corresponds exclusively to FSC International.



3 Field of application

This document is applicable to the activities carried out by AENOR to carry out the evaluation of the Chain of Custody by the FSC System.

AENOR can subcontract, within the geographical scope accredited by the accreditation body ASI (*Assurance Services International*), part of the certification process to freelance personnel whose competence has been recognized by AENOR.

AENOR will duly inform customers of the subcontracted processes, before the formalization of the certification contract.

In no case will AENOR subcontract to third parties the certification decision-making process.

4 Granting of the certificate

The FSC reference standards contemplate three modalities of Chain of Custody certification: individual certification, group certification and *multisite* certification.

These last two modalities are governed by the provisions of the FSC-STD-40-003 Multi-Site *Chain of Custody Certification* standard.

4.1 FSC Chain of Custody Certification Application

The interested organization will confirm to AENOR the reference standards applicable to its Chain of Custody System among the following:

- FSC-STD-40-003 Multi-Site Chain of Custody Certification.
- FSC-STD-40-004 FSC Standard for Chain of Custody Certification.
- FSC-STD-40-005 FSC Standard for evaluation by controlled wood companies.
- FSC-STD-40-006 FSC CoC Standard for Project Certification.
- FSC-STD-40-007 Standard for the use of recovered material in FSC product groups and FSC certified projects.

It will do so through the *Request for Offer* form, in the specific section of FSC Chain of Custody, or through any other means of communication (email, telephone communication ...).



4.2 Receipt and processing of the application

Once the application has been received, it will be processed by AENOR.

AENOR will reject applications for certification of sites that are already fsc certified by any other certification body, except in cases where a transfer process is underway, in accordance with FSC-PRO-20-003.

AENOR may not accept an application for certification when there are fundamental and proven reasons (for example, illegal activities).

AENOR will define the duration of the audit and the visits by assigning the number of *on-site* and total days to be carried out. This information will be included in the offer that is sent to the customer.

The acceptance of the offer implies the acceptance of all the requirements contained in it and is, for all purposes, a contractual document between the signatories. In addition, in order to start the certification process, the interested organization must sign the *License Agreement* (TLA) Form that will be previously provided from AENOR if needed or signed via FSC Connect.

Upon acceptance of the Proposal, and once the *License Agreement* has been signed, AENOR will include the client in the FSC database, indicating their status as "Applicant". This information is confidential until the time of granting the certificate.

4.3 Initial audit

AENOR will appoint the members of the audit team, who in any case will comply with the qualification requirements established in document FSC-STD-20-001 and in the specific procedures and instructions of AENOR.

Unless expressly requested by the client, the audit will be carried out in a single phase. If the client so requests, a documentary study and/or a previous visit can be carried out, in order to verify the viability of the certification prior to the initial audit.

In the case of *multisite* or groups, audits will be carried out by sampling, in accordance with the provisions of FSC standards in this regard and AENOR's own specific procedures.



4.3.1 Audit planning

The Lead Auditor shall agree with the client on the dates and place for the audit to be carried out, taking into account the duration of the audit. With this information, it will elaborate the audit plan that will be sent to the client at least fifteen days before the start date of the audit.

Prior to the audit, and well in advance, the client must submit an updated self-assessment describing how it complies with FSC's core labour requirements in its operations (according to Annex D of the FSC-STD-40-004 FSC Chain of Custody Certification standard).

4.3.2 Conducting and reporting the audit

The audit team will assess compliance with all applicable FSC standards requirements as indicated in the audit plan.

After the audit has been carried out, the client will be given a report containing the detected NCs. Subsequently, a more detailed evaluation report will be issued in accordance to the provisions of the FSC-STD-20-011 and the specific AENOR procedures and instructions.

In the event of non-conformities, the audited applicant entity will have a period of 30 calendar days to send AENOR the Corrective Action Plan (PAC or CAP) to fix the open NCs.

The closure of minor non-conformities is required within a period of one year (exceptionally 2 years). In the case of major non-conformities, closure is required within three months (exceptionally 6 months).

4.4 Evaluation and decision on certification

The audit report and the corrective action plan, if any, will be evaluated by AENOR. In order to be able to grant certification, corrective actions must be adequate to resolve the non-conformities detected and must be adequately implemented.

FSC certification may not be granted in the following cases:

- There is a major non-conformity for which the closure has not been evidenced.
- The organization does not have a valid and current FSC License (License Agreement).



AENOR reserves the right to delay or postpone its decision on certification in order to consider additional information that would not have been considered in the audit report and that could affect the outcome of the evaluation.

The results of the initial assessment are valid for a maximum period of six months. If within six months AENOR does not have all the necessary information to be able to make a decision regarding the certification, it will be understood to be out of time, and a new initial audit must be carried out for the issuance of the certificate.

See also paragraph 9 of the same Regulation.

AENOR may agree to grant or deny the certificate, as well as to carry out an extraordinary audit to verify the implementation of corrective actions.

AENOR reserves the right not to grant certification if the client's activities are contrary to AENOR's obligations as indicated in its contract with the ASI accreditation body or if, at AENOR's sole discretion, these activities damage its reputation.

The certification decision corresponds exclusively to AENOR and in no case will it be outsourced.

AENOR will communicate in writing to the company the agreement adopted on its request with indication of the reasons that motivated it.

4.5 Issuance of the CoC Certificate and the license to use the FSC Trademarks

Following the concession agreement, AENOR will issue the FSC Chain of Custody certificate. In addition, at the time of granting, AENOR will incorporate in the FSC Database the information related to the granting of the certificate. From this moment, this information is made public on the FSC website, which is accessed through the link <http://info.fsc.org/>.

FSC Chain of Custody certificates are issued with a validity of 5 years, except in the case of certificates of specific projects, in which the certificate has the validity of the project itself.

After the certificate has been issued, the customer may refer to their certified products through different means of communication (commercial catalogues, advertisements...).

The organization may not use its certification in a way that discredits AENOR, FSC or the ASI accreditation body.



The certificate does not exempt in any case from the guarantees and responsibilities that correspond to the company in accordance with current legislation.

The certificate certifies compliance with FSC standards for the scope and products previously defined and reflected in the certificate itself. The certificate, or any other document derived from the certification process, must not be used for purposes other than those for which they were generated or for deceptive or unauthorized purposes.

In accordance with FSC's specific requirements, the customer will not be able to issue claims (of conformity or disagreement) in relation to FSC requirements until such time as the certificate is granted.

The issuance of the certificate authorizes the certified organization to use the FSC trademarks, in accordance with the provisions of the FSC-STD-50-001 standard. Following the award of the certificate, AENOR will provide customers who request it with logging credentials to the FSC Portal. From this portal you will be able to download the FSC logos and consult the graphic requirements, the requirements for product labelling and the electronic versions of the FSC labels together with the company's certification code. Access to this Portal has an additional charge from FSC, for maintenance, which AENOR collects on behalf of FSC.

AENOR controls its customers' use of FSC trademarks. This control is carried out through surveillance and renewal audits and also through the attention of cases of detection or reporting of improper uses.

5 Certificate Maintenance

If there have been changes in the certification requirements since the previous audit, the certificate maintenance audit will be carried out in accordance with the new application standard, in accordance with the applicable transition requirements.

5.1 Surveillance audits

Prior to the audit, and well in advance, the client must submit an updated self-assessment describing how it complies with FSC's core labour requirements in its operations (according to Annex D of the FSC-STD-40-004 FSC Chain of Custody Certification standard).

During the period of validity of the certificate (five years), AENOR will carry out annual surveillance audits to the certified client, with the same scope and systematics as the initial



audit. The purpose of these is to verify that the conditions that gave rise to the granting of the Certificate are maintained.

At least one surveillance audit shall be carried out within each calendar year, but no later than 15 months from the previous audit. Surveillance audits may be carried out on a higher than annual basis in the cases described in FSC-STD-20-001.

In the event of non-conformities, the organization will have a period of 30 calendar days to send AENOR the Corrective Action Plan (PAC) that resolves them.

The closure of minor non-conformities is required within a period of one year (exceptionally 2 years). In the case of major non-conformities, their closure is required within three months (exceptionally 6 months).

5.2 Assessment and decision on maintenance

AENOR will evaluate the results of the surveillance audit together with corrective actions where appropriate. In view of this information, it may agree to maintain the certification, carry out an extraordinary audit (for example, to verify the implementation of corrective actions), or any of the sanctions provided for in Chapter 10 of the General Regulations.

The certification decision corresponds exclusively to AENOR and in no case will it be outsourced.

Five or more major non-conformities resulting from a surveillance audit will result in the certificate being suspended. This action will be applied within 10 days of the decision being taken.

Likewise, not closing in time a major non-conformity of a previous audit will lead to suspension of the certificate. See also paragraph 9 of the same Regulation.

AENOR will communicate in writing to the company the agreement adopted on the maintenance of its certificate, with indication of the reasons that motivated it.

6 Extraordinary Audits

As a result of the non-conformities detected in the audit, AENOR may decide to carry out an extraordinary audit, preferably within a period not exceeding six months from the previous audit, in order to assess that the non-conformities have been satisfactorily closed. They



shall be carried out in the same way as the initial or surveillance audits, and the relevant audit plan shall indicate the scope to be audited.

The extraordinary audit can also be carried out at the request of the company when it requests AENOR to extend the scope of its certification to new centers.

Likewise, and in accordance with FSC standards, AENOR reserves the right to carry out unannounced visits throughout the certification cycle, in order to ensure compliance with the requirements demanded by FSC for certification.

7 Certificate Renewal

At least two months before the end of the period of validity of the Certificate, a renewal audit shall be carried out in order to verify that the conditions that led to the granting of the Certificate are maintained and that its renewal is feasible.

Prior to the audit, and well in advance, the client must submit an updated self-assessment describing how it complies with FSC's core labour requirements in its operations (according to Annex D of the FSC-STD-40-004 FSC Chain of Custody Certification standard).

If the company does not want the Certificate to be renewed, it must communicate it in writing to AENOR at least 3 months before its expiration date.

A certificate will not be renewed if there is a major non-conformity for which no evidence of closure has been shown within the established deadlines.

AENOR will communicate in writing to the company the agreement it has adopted on the renewal of its certificate with an indication of the reasons that motivated it. In the case of renewal, a new certificate will be issued with a validity of 5 years.

8 Suspension and withdrawal

The provisions of the General Regulations shall be followed. In addition, in accordance with the provisions of FSC in this regard, any of the following situations will entail the suspension of the FSC Chain of Custody certificate:

- Five or more major non-conformities resulting from a surveillance audit will result in the certificate being suspended within 10 days of the decision.
- In the case of *multisite* or group five or more certificates major non-conformities issued to the head office will result in the suspension of the certificate in its entirety.



If they are issued to a particular site they will result in the suspension of the certificate to that site, but not necessarily the complete certificate.

- The fact that a surveillance audit shows that the proposed corrective actions in relation to major non-conformities from previous audits have not been adequately implemented within the foreseen time frame.
- Not to close within (2 weeks) a major non-conformity in relation to not being in possession of a valid and current FSC License.

A certificate will be suspended no later than three (3) months after the closing meeting of a surveillance audit if the certification decision to maintain the certification could not be taken due to circumstances beyond the control of AENOR.

NOTE: Circumstances beyond AENOR's control could include, but are not limited to, that the client or other parties avoid the use of the audit results and/or that the client delays or refuses to accept the results of the audit or the audit report.

The maximum period in which the certificate can remain suspended is 12 months (under justified reasons extendable to 18 months in order to allow the customer to carry out the correction of non-conformities). After this period the certificate will be withdrawn, unless all non-conformities / circumstances that led to the suspension have been satisfactorily closed or have been satisfactorily addressed. In the event that the suspension exceeds twelve months (always less than 18 months) for the lifting of the suspension, a surveillance audit must also be carried out.

In the case of withdrawals or suspensions of the certificate, the customer must:

- Identify all of your major customers, and inform them in writing of the suspension or withdrawal, within three business days of the suspension or withdrawal.
- Keep records of this communication to your customers.
- Cease any use of the FSC mark or statements about compliance with FSC certification requirements.
- Stop sales of any FSC labeled or marked product.
- Collaborate with AENOR and FSC to enable AENOR or FSC to confirm that the above obligations have been fulfilled.

In the event of withdrawal of the certificate, the AENOR customer undertakes to return to AENOR the original certificate or destroy it, as well as to destroy the copies that it would have generated. In the event of withdrawal of the certificate, the AENOR customer will



assume the expenses derived from the elimination of all uses of the FSC Trademarks, including names, initials and logo on all products, documents and promotional material.

If the suspension of a certificate is extended so that in the period of its suspension new requirements or certification standards are approved, in order to lift the suspension it will be ensured, through the performance of an audit, that the organization has adopted and implemented the new requirements and standards of application.

9 Claims

This section describes the system used to manage any claim that may be filed with AENOR or any of its headquarters, by any client, or any other interested party (for example: NGOs, consumer and user associations, public administration ...).

Complaints are initially received by the person of the Management, Delegation or center in which it is brought to the attention, which proceeds to its registration and communication to the Quality area (Accreditation Directorate), which will manage it. For its registration and management, the RG/CA/003 of Incident Management is used.

The recipient will communicate the complaint received to the area or headquarters that must resolve it and to the one that originated it. Within two weeks of receipt, AENOR's Quality area will send an initial response to the complainant, which will include the proposed deadline for the follow-up of the complaint.

With the collaboration of the Quality area and in common agreement with those involved, analysis of causes and, as appropriate, immediate actions and corrective, preventive or improvement actions will be carried out and recorded.

The Accreditation Directorate shall keep the complainant informed of the progress of the assessment of his or her complaint, and shall investigate the allegations and specify the actions proposed in response to the complainant, within three months of receipt of the complaint.

The Accreditation Directorate will file for at least 7 years the records derived from the claims. Likewise, it manages a database in which the content of the completed records is recorded, carrying out the control, monitoring and closure of the same ones, including the corrective, preventive or improvement actions that may arise.



If the claimant does not agree with the treatment given to his claim, he may write to the Director General of AENOR, who will give a definitive answer.

Finally, at the request of the interested parties, the name of the members of AENOR who intervene in the complaint resolution process may be provided.

The claimant also has the opportunity to refer their claims to the dispute resolution process of the ACCREDITATION BODY ASI or ultimately the FSC, in the event that the problem is not resolved through the full application of AENOR's own procedures.

10 AENOR Accreditation

In case of reduction, suspension or withdrawal of the scope of accreditation of AENOR for the performance of FSC Chain of Custody audits, the certificates of the affected clients will be suspended *ipso facto* six months from the date on which the reduction of scope, suspension or withdrawal of AENOR accreditation becomes effective.

In these cases, the client will be informed by AENOR within thirty days from the reduction of the scope, the suspension or the withdrawal of his accreditation. Customers will need to look for a new FSC certification authority within six months to keep their certificate valid.

11 Applicable fees

AENOR will establish and communicate to the companies that request the certification the rates corresponding to the activities related to the granting, monitoring and renewal of the Certificate. The rates will be communicated in a general way in the corresponding offer.

Payments made during the concession process will not be refunded to the applicant organisation under any circumstances.

In addition, FSC certification entails administration costs (AAF) that AENOR collects on behalf of and with the proper authorization of FSC. The current rates are described in FSC-POL-20-005 (available in www.fsc.org in its current edition). AENOR reserves the right to increase the fees by 4% for currency conversion.

As set out in FSC-POL-20-005, the administrative fee (AAF) is calculated based on the annual turnover of the certified entity, corresponding to the most recent full fiscal year. For its calculation, AENOR requests from customers, annually in each audit, updated



information regarding the turnover of the organization, corresponding to certified and non-certified forest products, and products containing wood components or wood fibers.

Auditors are required to verify Revenue and Turnover through the submitted Declaration and at least one of the following two evidences: ERP System review or financial results presented by a third party (reputable professional services firm, external financial audit, financial results audited by the Government).

If the Turnover and/or the Revenue figures entered in the FSC Certification Database for a fiscal year turn out to be inaccurate, in addition to updating the FSC Certification Database, AENOR shall inform FSC by email and attach the supporting documents without undue delay. In the case AENOR has not been able to collect the Turnover/Revenue numbers (due to reasons uncontrolled by the certification body. E.g: The client is suspended and not answering the emails or phone), we need to report this issue to FSC Database and assume previous Revenue/Turnover data as the most up to date number for AAF Calculations.

AENOR is not responsible for any sanctions or penalties that FSC may impose, in accordance with the provisions of FSC-POL-20-005, derived from inadequate or incorrect information to AENOR by customers about their annual turnover, which would result in an inadequate or incorrect allocation of the applicable rate.

For the collection of the applicable fee, AENOR will issue an invoice annually to certified customers clearly showing the amount of the AAF fees.