

RULES FOR THE CONCESSION AND MAINTENANCE OF CHAIN OF CUSTODY AND CERTIFIED SOURCING CERTIFICATION (SFI - CHAIN OF CUSTODY; SFI CERTIFIED SOURCING)

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Technical rules

CONTENTS

CHAPTER 1 – AIM	.1
CHAPTER 2 – DEFINITIONS	
CHAPTER 3 – GENERAL	
CHAPTER 4 – CERTIFICATION PROCESS	
CHAPTER 5 – MAINTENANCE OF CERTIFICATION	
CHAPTER 6 – SUPPLEMENTARY AUDITS	
CHAPTER 7 – CERTIFICATE RENEWAL	
CHAPTER 8 – WITHDRAWAL, SUSPENSION OR SURRENDER OF CERTIFICATES	
CHAPTER 10 – RIGHTS AND DUTIES OF THE CERTIFIED ORGANISATION	
CHAPTER 11 – AMENDMENTS TO THE STANDARDS	
CHAPTER 12 – USE OF THE LOGO AND CERTIFICATE	
CHAPTER 13 – CONFIDENTIALITY	
CHAPTER 15 – APPEALS	
CHAPTER 16 - CONTRACTUAL CONDITIONS	
CAPITOLO 17 – CERTIFICATE TRANSFER	

CHAPTER 1 – AIM

1.1

These Rules describe the procedures applied by RINA for the issue of chain of custody and certified sourcing certification (SFI-COC and SFI-CS) and how the certificate can be applied for, obtained, maintained and used, as well as its possible suspension and withdrawal.

1.2

The terminology used in these Rules complies with the terminology of the SFI Chain of Custody Standard (Section 4) and SFI Certified Sourcing Standard (Section 5) from now on mentioned as SFI-COC and SFI-CS

CHAPTER 2 - DEFINITIONS

2.1

SFI: Sustainable Forestry Initiative

GR: Organisation applying for group certification

CoC: Chain of Custody CS: Certified Sourcing FM: Forest Management GVI: Audit Team

NC: Non Conformity AC: Corrective Action

CHAPTER 3 - GENERAL

3.1

The certification system contemplated in these Rules represents an implementation of the SFI-COC and SFI-CS of an organisation which operates in the field of forest based products.

THE SFI Chain of Custody and SFI Certified Sourcing Standard promotes sustainable forestry practices based on 13 Principles, 17 Objectives, 41 Performance Measures and 141 Indicators.

Thanks to this certification, it is possible for an organisation which produces, transforms or markets forest based products to guarantee the origin from sustainable forest management of the wood it uses through traceability of the raw wood material throughout the chain according to the requirements contained in the above documents.

The chain of custody requirements describe how to transfer the information concerning the origin of the raw materials acquired to the information on the origin of the organisation's products.

The Certified Sourcing tell buyers and consumers that fiber in a product comes from a company that is certified to the SFI 2022 Fiber Sourcing Standard, or

comes from recycled content, or from a certified forest. All fiber must be from non-controversial sources.

In relation to certification, RINA will apply its current fees, guaranteeing fairness and uniform application to every type of product.

3.3

In connection with the application of these Rules, RINA does not provide consultancy services to organisations for the establishment of a management system or for the implementation of procedures aimed at ensuring compliance with the requirements of the SFI Standards and Rules.

3.4

The organization, unless otherwise specified, tacitly agrees to RINA's disclosure of the relevant information to the SFI national office.

CHAPTER 4 - CERTIFICATION PROCESS

4.1

Organisations wishing to obtain SFI-COC and/or SFI-CS certification must provide RINA with the main data of their organisation by sending the "Informative Questionnaire" (Available upon request), on the basis of which RINA will prepare an offer.

In case of multiste organizations, the pre-conditions defined in Section 10, Appendix 1 of the SFI Standards and Rules are met.

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;
- 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);

4.2

Organisations formalise their request by sending RINA the form "Request for certification of SFI Chain of Custody" "Request for certification of SFI Certified Sourcing" (Available upon request) in which the organization subject to certification is to be defined.

On receipt of the request form and related enclosures and following a preliminary review to ensure they're complete, RINA will send the

organisation written confirmation of acceptance of the request.

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

RINA communicates the names of the auditors who will perform the audit to the organisation; the latter may object to the appointment of the members of the audit team giving its reasons, within 3 days of the communication of the names.

Together with the request or in any case, prior to the on-site audit, the documented SFI-COC/SFI-CS procedures implemented is to be sent to RINA.

RINA can carry out an off-site review of the client organisation's documentation prior to the on-site audit to determine the conformity of the SFI-COC/SFI-CS documentation with the audit criteria.

The documentation indicated in 4.2 will be kept by RINA for its files.

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.

4.3

The certification audit and re-certification audits can be conducted remotely as far as the pre-conditions explained in Section 10, Appendix 4 of the SFI Standards and Rules are met.

During the on-site audit of site, it will be checked:

- the conformity of the client organisation's with the requirements of the SFI-COC/SFI-CS standard and the relevant Appendix with the definition of the raw material origin and its effective implementation;
- the conformity of the client organisation's management system with the requirements of the SFI-COC/SFI-CS standard and its effective implementation;
- the conformity of the client organisation's chain of custody process with requirements for the avoidance of raw material from controversial sources where applicable;
- the conformity of the client organisation with the SFI logo usage rules and its effective implementation;¹
- that effective procedures are in place and implemented to ensure traceability of the origin of the raw material using the method defined for the calculation of the certified raw material, definition of product groups, organisational structure with the definition of the roles and responsibilities, training of the personnel involved in maintaining the system, a system of internal audits, management of complaints and assessment of the level of risk of having controversial sources as origin of the raw materials used, compliance with social

¹ The usage of the SFI Logo and SFI claims is to be evaluated at the time of the surveillance, recertification audits and transfer of certificate.

requirements and with occupational health and safety requirements as stated in the SFI-COC/SFI-CS Standards, as well as knowledge of the proper use of the logo.

4.4

In the case of multisite applicants, the site audit is performed by sampling. Sampling will cover all the types of applicant organisations (user companies, primary wood processing companies, secondary wood processing companies, commerce, other).

The sample should be partly selective based on the factors set out below and partly non selective, and should result in a range of different sites being selected, without excluding the random element of sampling.

At least 25% of the sample shall be selected at random.

RINA reserves the right to check, at least once in the five year period of validity, all the sites/areas subject to certification.

If the organisation intends to extent the sites/areas to those already certified, the new set will be considered independently of those previously certified. For subsequent surveillance audits, all the sites will be considered together.

The Organization shall inform it about the closure, establishment, or change in activities of sites. Failure to provide such information will be considered by RINA as a misuse of the certificate, therefore RINA will ensure the suspension of the certificate.

RINA, before starting the evaluation process, verifies that the eligibility criteria established Section 10 the SFI Standards and Rules are met.

RINA should not proceed with the evaluation if any of the eligibility criteria for the multi-site organisation are not met.

The certificate will not be issued if should any nonconformity arise during the audit in relation to these eligibility.

4.5

At the end of the audit, the GVI will explain the organisation any non conformities found and observations made and a written copy of the findings will be send to the send non later than 5 business days after the audit.

The organisation may note down any reservations or observations it has regarding the non conformities or findings highlighted by the RINA auditors in the specific space in the audit report.

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

If there is no written communication to RINA, the report is considered confirmed 5 days after it has been delivered to the organisation.

After analysing the causes of any non conformities contained in the above report, the organisation is to propose to RINA the necessary corrective actions and

time required to implement them in the specific field in the audit report. RINA will inform the organisation whether it accepts these proposals.

4.7

The following are considered major nor conformities:

 One or more of the SFI-COC/SFI-CS Standard(s) performance measures or indicators has not been addressed or has not been implemented to the extent that a systematic failure of a Certified Organization's SFI system to meet an SFI objective, performance measure or indicator occurs.

A minor non conformity is considered:

 An isolated lapse in SFI-COC/SFI-CS Standard(s) implementation which does not indicate a systematic failure to consistently meet an SFI objective, performance measure or indicator.

A Observation is considered:

 An evaluation finding that does not warrant nonconformity but is identified by the audit team as an opportunity for improvement.

Major or minor non conformities may also arise as a result of total or partial non compliance with this document.

Nonconformities identified at the site or organizational level shall be addressed by the central function considering both the site level implications and the broader implications for the organization as a whole.

4.8

The organisation must define the corrective actions, for both major and minor NC, within 30 days of issue of the corresponding NC and approved by RINA before the certificate is issued.

Major nonconformities shall be corrected and the corrective action(s) verified by the certification body before granting a certification and recertification.

In such cases, a supplementary audit will be carried out within 3 months to check that the proposed corrective actions have been properly implemented; following the successful outcome of this audit, the certification process will be resumed. The supplementary audit will be performed on site or off site according to the type of findings and so in connection to the need or less to perform again the on site visit. The decision about the way of performing the supplementary audit will be taken by RINA, evaluating case by case.

If the 3 month period is exceeded without the possibility of verifying implementation of the corrective actions proposed, the certification process is suspended and will be subject to a complete review within 12 months from the date of the finding.

At the end of the 12 month period, if the assessment is not positive, RINA reserves the right to definitively close the certification file and charge for the

time and expenses incurred until then. In such a case, if the organisation intends to pursue RINA certification, it will have to submit a new request and repeat the entire certification process.

The above time limits may, in special cases, be modified, at the discretion of RINA and following a justified reason by the organisation.

4.9

If the outcome of the on site audit is positive, 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 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, a certificate of compliance with the SFI-COC/SFI-CS scheme will be issued, valid for five years.

The outcome of the decision is communicated to the applicant through dispatch of the certificate and to the association SFI (Regulatory Body) by transmitting the identification data of the certificate.

4.10

The certificate will contain the following information:

- identification of the certification body;
- company name;
- any adherents to the group or multi-site;
- current edition of the reference standards;
- certification level;
- certificate number;
- date of issue;
- expiry date;
- national accreditation information (including accreditation number and name of the accreditation body and RINA accreditation number).

In case of multi-site certification, RINA will issue one single certificate with the name and address of the central office of the Organisation. RINA will issue a list of all the sites to that the certificate relates, either on the certificate itself or in an appendix or as otherwise referred to in the certificate. The scope or other reference on the certificate shall make clear that the certified activities are performed by the network of sites in the list.

A sub-certificate may be issued to the organization for each site covered by the certification on condition that it contains the same scope, or a sub-scope of that scope, and includes a clear reference to the main certificate.

The certificate will be withdrawn in its entirely, if the central office or any of the sites does not/do not fulfil the necessary criteria for the maintaining of the certificate.

The list of sites shall be kept updated by RINA. To this effect, RINA requests the Organization to inform it about the closure, establishment, or change in activities of sites. Failure to provide such information will be considered by RINA as a misuse of the certificate, therefore RINA will ensure the suspension of the certificate.

Additional sites can be added to already existent certificate as result of evaluation/surveillance activity

4 11

A preliminary on-site audit to check the general state of implementation of the SFI-COC/SFI-CS standard may be made, subject to agreement with the organisation.

CHAPTER 5 - MAINTENANCE OF CERTIFICATION

5.1

Following issue of the certificate and in order to verify that the SFI-COC/SFI-CS system remains compliant with the requirements of the Standard, at least one annual surveillance audit will be carried out.

The organisation is only required to send RINA the completed questionnaire if changes have been made compared to what was previously stated.

Moreover, during the surveillance audits, a check is done to verify that the NC found during the previous audit have been resolved, to verify the proposed and implemented AC and to verify the sites not previously sampled in the case of a multi-site/group.

The duration of the surveillance audits and the site sampling methods are undertaken according to the requirements established in Section 10 of the SFI Standards and Rules.

The audits are performed according to the UNI EN ISO 19011 Standard and ISO 17065 as required by Section 10 of the SFI Standards and Rules.

Following the positive outcome of the on-site audit, the organisation is given an audit report containing any findings identified.

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

If a minor NC is not resolved, it is reissued as a major NC and therefore will have to be resolved within the following 3 months, as described above.

The Major NCs are to be resolved in accordance with the same methods described for first certification.

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.

The certificates cannot be kept if the organisation has not proposed corrective actions, accepted by RINA, related to the NC found.

The organisation has three months in which to solve the major NC; should they not be resolved in this time limit, the certificate will automatically be suspended.

In the case of a change to the field of application of the certificate, for example due to an increase/reduction of the sites, 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.

The annual on-site surveillance audit at the Organisation's premises or replace it with other audit techniques, such as documentation and records review if Section 10, Appendix 4 of the SFI Standards and Rules are met.

CHAPTER 6 - SUPPLEMENTARY AUDITS

The organisation must inform RINA of any changes or need to extend the scope of its certificate. Supplementary audits may be of a documental nature or on site.

On-site supplementary audits may be performed in the following cases:

- verification of the implementation of corrective action related to major and minor NC, for granting a certification and recertification, within 3 months of the date when the NC were issued;
- pre-audit request to assess whether the company is ready for the certification audit;
- any communications received by RINA relevant to non compliance by the certified organisation with one or more requirements of the SFI-COC/SFI-CS Standard;
- requests to modify the certificate which do not change the number of man/days.

If the surveillance audit is not far off, any requests for certificate extension or modification can be taken into account during this audit.

As concerns the request for scope extension of the certificate in the case of new sites for group or multisite certification or new products subject to certification, it might not be possible to treat it as a supplementary audit but rather as new certification.

A change of scope can only be made provided it does not involve an extension to the expiry date of the certificate beyond the period for which it was originally issued.

RINA reserves the right to carry out an audit on site before making a decision regarding the request to modify the scope of the certificate. In particular, for each change for which a supplementary audit is required by RINA, the organisation cannot issue any certificate concerning certified products derived from these changes until RINA has notified the organisation that it can do so. If the audit outcome is positive, RINA will amend the scope of the previously issued certificate, ask the organisation to destroy any copies of the previous certificate it still has and will issue a new certificate.

CHAPTER 7 - CERTIFICATE RENEWAL

7.1

On expiry of the certificate, valid for 5 years, a certification renewal audit will be performed. This audit will be carried out in compliance with the ISO 19011 Standard.

7.2

The renewal audit is carried out the same way as the first certification audit, except for the fact that it consists of a single audit phase, and aims to check the same audit elements audited during the first certification audit,

CHAPTER 8 - WITHDRAWAL, SUSPENSION OR SURRENDER OF CERTIFICATES

8.1

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

- 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;
- identification of particularly serious NC;
- the organisation has not implemented corrective action, following major NC found;
- use of the SFI logo without having obtained the user licence from SFI or for non-payment of the annual fee for use of the logo;
- any other situation covered by the document "General contract conditions governing system, product and personnel certification"

the certificate will be suspended. The suspension measure is notified to the organisation and to SFI. The organisation has 3 months in which to implement the necessary corrective action and a supplementary audit will be made; if this audit is successful, the suspension may be revoked.

If it is not possible to eliminate the causes leading to suspension of the certificate within 3 months, the certificate is revoked and its use prohibited.

In the period between suspension of the certificate and revocation of suspension, the products obtained cannot be declared as conforming.

On revocation of the certificate, the organisation must immediately cease using it and/or in the case of group or multi-site organisations, must cease using all subcertificates.

From the time of suspension, withdrawal of the certificate, cancellation of the contract due to renouncement or expiry of the terms of validity, the client will be required to:

- immediately stop using any SFI mark on products and/or promotional material;
- immediately stop selling the products previously labelled and marked using the SFI mark;
- immediately stop using statements which may suggest the organisation complies with the certification requirements.

Moreover, if the certificate is withdrawn, the organisation is required to:

- return the certificate to RINA and undertake to destroy all electronic and paper copies in its possession;
- remove, at its own expense, the SFI mark, SFI statements and RINA logo from all products, documents, advertising material.

The decision to withdraw a certificate and the pertinent reason(s) are communicated to the organisation concerned as well as to SFI.

In the case of a certificate which has been withdrawn or has expired, the certified products which left the organisation when the certificate was still valid continue to be certified even after the certificate has been withdrawn or has expired; vice versa, the products which have not yet left the organisation certified at the time of withdrawal or expiry of the validity of the certificate, can no longer be considered as certified products, with immediate effect.

8.2

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

RINA will inform SFI of the decision to surrender the certificate.

CHAPTER 9 - EXTENSION

The organisation may ask RINA, in writing and for a justified reason (no orders, considerable organisational changes, other), for a delay not exceeding three months from the date of the surveillance audit. RINA will assess the request and decide whether to grant it or not.

CHAPTER 10 - RIGHTS AND DUTIES OF THE CERTIFIED ORGANISATION

10.1

The organisation has the right to:

- advertise the fact that it has obtained SFI-COC/SFI-CS certification, always in compliance with Section 6 of the SFI Standard and Rules.

10.2

The organisation must:

- not use certification on products which are not subject to certification or induce a similar doubt;
- not transfer the certification acquired except in cases where the organisation could be transferred or transformed. In this case, the organisation undertakes to promptly inform RINA, which takes note after checking that no changes to the SFI-COC/SFI-CS system have been made;
- maintain its SFI-COC/SFI-CS system active during the period of validity of the certificate;
- use the SFI logo correctly, according to the requirements for use specified in these Rules and in the pertinent SFI standard;
- comply with RINA and certification scheme requirements when making reference to its product certification and about information related to the product in communication media such as documents, brochures or advertising;
- inform RINA of any changes to the organisation (company management, human resources, production processes, etc.);
- always comply with the certification requirements, even in the case of changes communicated to RINA;
- provide adequate assistance to the audit team during the initial audit and during subsequent maintenance audits, also allowing access to premises and offices, production sites, products and documents subject to audit, including those of sub-contractors:
- if copies of supporting documents are requested, provide them in full or as specified in the certification scheme;
- implement the AC proposed in relation to the NC found during the audits;
- allow access to the sites and to confidential information (also of subcontractors) and to the authorised representatives of the accreditation bodies;
- pay the contractually fixed fees even if the certificate is not issued or it is withdrawn or suspended:
- ensure the possibility of performing on-site audits at their suppliers;
- bring its SFI-COC/SFI-CS system into line with any amendments to the reference standards/RINA Rules in accordance with the time frame established in these Rules.

CHAPTER 11 - AMENDMENTS TO THE STANDARDS

11.1

RINA reserves the right to inform its client organisations of all important amendments/updating to the reference standards, specifying the action to be taken and the time within which it is to be implemented.

Unless established otherwise, the organisation will have 12 months in which to comply with the new SFI requirements and with the consequent amendments to these Rules.

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

CHAPTER 12 - USE OF THE LOGO AND CERTIFICATE

12.1

SFI Logo on the certificate only refers to the Organisation's compliance with the SFI certification scheme and does not provide the Organisation with the right to use the SFI Logo.

The client organisation with a valid SFI-COC/SFI-CS certificate can only use the SFI trademarks with a unique SFI trademarks licence number for "on-product" as well as "off-product" purposes, based on a SFI licence contract issued by the SFI relevant office and in accordance with Section 6 of SFI Standards and Rule document.

If the certified organisation wants to use the logo in ways different from those described above, these will have to be approved by SFI.

RINA will monitor use of the logo granted to individual companies and to organisations which have group/multi-site certificates during audits.

12.2

SFI manages the rights to use the SFI logo through a written contract.

An organisation which has obtained group or multi-site certification may grant use of the logo to its associates, if they ask for it and provided they are included on the certificate, through a written contract which also contains the rules for use of the logo.

CHAPTER 13 - CONFIDENTIALITY

13.1

The information acquired during the activities carried out by RINA and related to SFI-COC / SFI-CS certification, is considered and treated as confidential.

CHAPTER 15 - APPEALS

15.1

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

RINA will examine the appeal within 2 months of its submission, possibly also consulting the organisation's representatives.

15.2

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

CHAPTER 16 - CONTRACTUAL CONDITIONS

16.1

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

CAPITOLO 17 – CERTIFICATE TRANSFER

If an organisation with a valid certificate issued by another Accredited Certification Body wishes to transfer its certification to RINA, it must send RINA the "Informative Questionnaire" as per point 4.1, and

copy of the of SFI certificate.

RINA, after verifying that:

- the certificate is valid;
- the certificate is not suspended;
- accreditation of the Certification Body that issued the certificate is not suspended;
- the client's certified activities fall within the accredited scope of RINA;
- the organization has motivated the request of transfer

issue an offer for the transfer of certification.

If it accepts the economic offer, the organisation must send RINA the "Certification request" together with the following documents:

- Copy of the certification audit report or the last recertification audit report and of the subsequent surveillance audit reports;
- evidence of the corrective action taken related to the non-conformities issued during the previous audit, or the evidence of the review, acceptance and verification of the effectiveness by the previous Certification Body;
- the type and date of the next audit planned by the previous Certification Body;
- list of any complaints received and the relevant actions taken;
- the reasons for the certification transfer request;
- any observations or reports by national or local authorities;

The check of the above documentation usually includes an audit to the Organization requesting transfer of its certificate.

The contract between RINA and the applicant is managed as indicated in paragraph 4.1, depending on the scope of the auditing activities.

After the satisfactory completion of the above activities, a SFI-COC/SFI-CS Certificate of Conformity is issued which generally maintains the deadline established by the body which issued the previous certificate

Generally speaking, surveillance and recertification audits are also performed according to the plan established by the organisation that issued the previous certificate.

In the case where the conditions for the transfer are not met, the transfer process can not be applied; if the organization intends to continue with the certification process will be evaluated using the criteria set out in Chapter 4, "CERTIFICATION PROCESS".

RULES FOR THE CONCESSION AND MAINTENANCE OF CHAIN OF CUSTODY AND CERTIFIED SOURCING CERTIFICATION (SFI - CHAIN OF CUSTODY; SFI - CERIFIED SOURCING)

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