



LegalSource™ Audit Report

for Solid Parkiet spółka cywilna

Annual audit 2023

Report date: 12/03/2024

Certificate code: NC-LS-017279

First Issue date: 24 November 2014

Current Issue date: 24 November 2019

Organisation Contact

Anna Budyn - Świerczek
ul. Wolicka 7,
32-830 Wojnicz, Poland

Audit managed by

NEPCon Sp. z o.o.
ul. Emaus 7/11, 30-201 Kraków, Poland

LegalSource Audit Report Template:	
Document Code:	LS-03
Type of document:	LegalSource Audit Report Template
Scope:	International
Status of document:	Approved
Version:	V 2.1
Date:	23 rd January 2018
Consultation period:	N/A
Approval body:	Preferred by Nature
Contact person:	Alexandru Orban – Systems Specialist Forestry
Contact email:	aorban@preferredbynature.org

Contents

A. INTRODUCTION	4
B. SCOPE	4
C. AUDIT FINDINGS	9
D. CLOSED NON-CONFORMANCES	11
E. LEGALSOURCE DUE DILIGENCE CHECKLIST (CONFIDENTIAL)	ERROR! BOOKMARK NOT DEFINED.
G. LEGAL COMPLIANCE IN THE SUPPLY CHAIN (CONFIDENTIAL).....	ERROR! BOOKMARK NOT DEFINED.
STANDARD CHECKLIST - NO RISKS IDENTIFIED IN 2022	ERROR! BOOKMARK NOT DEFINED.
H. CHAIN OF CUSTODY (COC) (CONFIDENTIAL)	ERROR! BOOKMARK NOT DEFINED.
STANDARD CHECKLIST	ERROR! BOOKMARK NOT DEFINED.
I. EVALUATION OF SUPPLIER VERIFICATION PROGRAMME (CONFIDENTIAL)	ERROR! BOOKMARK NOT DEFINED.
APPENDIX 1: OVERVIEW OF PRODUCTS/ SUPPLY CHAINS EVALUATED BY ORGANIZATION (CONFIDENTIAL)	ERROR! BOOKMARK NOT DEFINED.
APPENDIX 2: OVERVIEW OF PRODUCTS/ SUPPLY CHAINS EVALUATED BY NEPCON (CONFIDENTIAL)	ERROR! BOOKMARK NOT DEFINED.
APPENDIX 3: EXHIBIT LIST (CONFIDENTIAL)	ERROR! BOOKMARK NOT DEFINED.

A. Introduction

The purpose of this report is to document conformance with the requirements of the LegalSource standard by Solid Parkiet s.c. hereafter referred to as "Organisation". The report presents findings of LegalSource auditors, who have evaluated the Organisation's systems and performance against the applicable requirements. The sections below provide the audit conclusions and follow-up actions required by the Organisation.

Dispute resolution: If stakeholders have concerns or comments about the LegalSource standard or the auditing body, they are encouraged to contact their closest NEPCon regional office. Formal concerns and complaints should be sent in writing.

B. Scope

The LegalSource audit, report and certificate covers the following scope:

Report Type	
Report type:	Confidential

Organisation Details	
Primary contact:	Anna Budyn – Świerczek - co-owner
Address:	ul. Wolicka 7, 32 – 830 Wojnicz, Polska
Tel/Web/Email:	+48146787500, solidparkiet@solidparkiet.pl http://solidparkiet.pl/
Jurisdiction of primary legal entity:	Poland
Primary Activity	Secondary Manufacturer
Description of Organisation:	<p>Manufacturer of floor products. Single site with 1 factory located in the south of Poland.</p> <p>The LegalSource certificate scope of Organisation covers the production of solid wood floor planks made of native to Poland broad-leaved species: <i>Quercus robur</i> [mainly], <i>Quercus petraea</i>, <i>Fraxinus excelsior</i>, <i>Acer pseudoplatanus</i>, and one non-native species grown in Poland - <i>Quercus rubra</i>. Additionally, FSC certified <i>Pinus Sylvestris</i> and <i>Picea abies</i> plywood is used. The sawn-wood material is sourced locally (south of Poland, Sloviaka) within radius of no more than 150 km from CH's factory. Species other than oak are used occasionally and main production is based on oak.</p> <p>Solid Parkiet sources all of its wood material from southern regions of Poland (Podkarpackie, Małopolskie, Śląskie) and from 2023 from FSC certified forest in Slovakia. Annual material turnover is about 1500 m3. Nearly all roundwood sourced by sawmills (Solid Parkiet suppliers) derives from FSC certified state forests. The rest comes from PEFC certified FMUs of RDLP Krosno State Forest (northern region, FSC low risk FMUs only: nadleśnictwa Tuszyna, Strzyżów, Leżajsk, Krasieczyn, Oleszyce, Jarosław, Głogów, Lubaczów, Brzozów, Dukla). FMUs are low risk in FSC CNRA for Poland. The company do not buy wood from FMUs where FSC indicated specified risk (Białowieża, Hajnówka, and Browsk Forest Districts).</p>

	<p>Organization has implemented a Due Diligence System (DDS) and Chain of Custody (CoC). All input material is coming from sawmills and FMUs located south of Poland (except FSC certified plywood) and from 2023 from FSC certified forest from abroad. These systems seek to avoid the wood from non-approved FMUs, private forests, that might enter sawmills. Solid Parkiet ensures that, for LegalSource production and claims following wood categories are used:</p> <ul style="list-style-type: none"> - FSC 100% certified, - 100% PEFC certified only from regions identified as low risk in FSC CNRA for Poland 2018 <p>Within Solid Parkiet, the sawn timber is segregated, stored, dried, and placed at production unit. Further the final product (flooring board) is packed and sold in German and other western European markets.</p> <p>In 2022 site was added. Site located in the same address, using the same space and equipment. Same ownership. Internal procedures, list of product, suppliers the same for all sites.</p>
--	--

Certificate Scope	
Certificate Type	<input checked="" type="checkbox"/> Single site certificate <input type="checkbox"/> Group/ Multi-site certificate
Standards Evaluated:	<input checked="" type="checkbox"/> LegalSource Standard (LS-02) <input checked="" type="checkbox"/> NEPCon Generic Chain of Custody Standard (NC-STD-01) <input type="checkbox"/> NEPCon Generic Group & Multi-Site Standard (NC-STD-02)
Product scope:	<p>Floor Parquet 4409 Floor Lam-parquet 4409 Solid wood floor panels 4409</p> <p>Species: European oak (<i>Quercus robur</i>, <i>Quercus petraea</i>) European ash (<i>Fraxinus excelsior</i>), Red oak (<i>Quercus rubra</i>), Black locust (<i>Robinia pseudoacacia</i>), Sycamore maple (<i>Acer pseudoplatanus</i>), Wild Cherry (<i>Prunus avium</i>), European beech (<i>Fagus sylvatica</i>), Silver birch (<i>Betula pendula</i>), White birch (<i>Betula pubescens</i>).</p> <p>Lamela 4408</p> <p>Species Top: European oak (<i>Quercus robur</i>, <i>Quercus petraea</i>) European ash (<i>Fraxinus excelsior</i>), Red oak (<i>Quercus rubra</i>)</p> <p>Species Plywood: Scots pine (<i>Pinus Sylvestris</i>), Norway Spruce (<i>Picea abies</i>), Silver birch (<i>Betula pendula</i>), European alder (<i>Alnus glutinosa</i>), European beech (<i>Fagus sylvatica</i>).</p>
Current changes to certificate scope since last audit:	Due to lack of certified material in Poland DDS was updated to supply from Slovak FSC certified forests.
Past changes (implemented in previous audit)	<p>In 2019 following species have been removed: <i>Robinia pseudoacacia</i>, <i>Betula pendula</i>, <i>Betula pubescens</i>, <i>Fagus silvatica</i>, <i>Acer pseudoplatanus</i>, <i>Prunus avium</i>.</p> <p>In 2019 following species have been added: <i>Pinus Sylvestris</i> and <i>Picea abies</i> in a form of FSC certified plywood from Paged Sklejka, Poland.</p>

	<p>In 2021 added 3 species as input to plywood: <i>Betula pendula</i>, <i>Alnus glutinosa</i>, <i>Fagus sylvatica</i>.</p> <p>Reduce the number of species on the top layer of floors to: European oak (<i>Quercus robur</i>, <i>Quercus petraea</i>) European ash (<i>Fraxinus excelsior</i>), Red oak (<i>Quercus rubra</i>).</p> <p>In 2022 site was added. Site located in the same address, using the same space and equipment. Same ownership. Internal procedures, list of product, suppliers the same for all sites.</p>
<p>Certificate Sites or Group members</p> <p><input type="checkbox"/> No other sites</p>	
<p>Site 1:</p>	
Site name:	Solid Parkiet s.c. Paweł Budyn, Ewa Szczupak, Anna Budyn-Świerczek, Samantha Ben, Sammy Ben
Site Address/ Tel/Web/Email:	Reference info above.
Site Activity:	Secondary Manufacturer
Product Scope:	Reference info above.
Site visited during audit:	<input checked="" type="checkbox"/>
<p>Site 2:</p>	
Site name:	Pavimentum s.c. Paweł Budyn, Ewa Szczupak, Anna Budyn-Świerczek, Samantha Ben, Sammy Ben
Site Address/ Tel/Web/Email:	Reference info above.
Site Activity:	Secondary Manufacturer
Product Scope:	Reference info above.
Site visited during audit:	<input checked="" type="checkbox"/>

Evaluation Process	
Audit team:	<p>Mikhail Rai – LS / FSC / PEFC Witness auditor</p> <p>Jakub Wicher – LS Lead auditor in training</p>
Description of Audit Process:	<p>2023 annual evaluation process has been conducted on-site on 19st of December 2023 to 9th January 2024 (only closing meeting) at the main office, factory site location - Wojnicz, near Tarnów, Poland. Visit cover also site of Organization that is located in the same address.</p> <p>Audit was witnessed, the witness auditor participated remotely.</p> <p>The owners of the company, daily management staff, certificate responsible person and auditor were present at opening meeting. Organization was informed about data and information protection policy as well as the methodology of the auditing and approval process.</p> <p>At this second stage, the following procedures and documents were assessed:</p> <ul style="list-style-type: none"> - DDS procedures - risk evaluation - material ordering system - checking of the incoming material - purchase policy of the company - supplier declaration signed by new supplier - purchase and sale invoices. - supplier list - access to FSC CNRA for Poland <p>During the field visit, the organization's site was visited to confirm management quality, scope of production, species used and stored, quantities, source of material, knowledge of staff, received material storage areas, sawing and production lines and halls, drying compartments and final product storage sites. Key staff were interviewed in connection to general understanding of due diligence procedures, receiving, storing, production and final sale of wood.</p> <p>Next day chosen suppliers location audit was conducted:</p> <ol style="list-style-type: none"> 1. GLOSBE WOOD Sp. Z.O.O. Łukasz Turek Jeleniów 13, 26-006 Nowa Słupia 2. TRANSTUR WOOD SP. Z.O.O. Waldemar Turek Jeleniów 57 <p>Interview with owner of a small company, log-landing stock inspected to confirm origin of wood by digit identity numbers. Following documents were checked: purchase and delivery documents, sales invoices.</p> <p>The closing meeting was rescheduled due to Christmas and New Year vacation and was conducted remotely on 09 January 2024 where audit conclusions were provided verbally. CH was informed on the termination of the LegalSource services in 2024.</p>

Actions taken by Organisation prior to report finalisation:	No additional actions required or taken.
Notes for the next audit:	No specific instructions.

C. Audit Findings

Audit Conclusion:	
Organisation approved: No non-conformances issued	<input checked="" type="checkbox"/>
Organisation not approved:	<input type="checkbox"/>
<p>Additional comments: Low risk LS certificate holder. The scope of the LegalSource certificate and material procurement due diligence system of Organisation is limited to local suppliers and FMUs. Organization sources its wood entirely from south of Poland and Slovakia. In 2014 - 2023 period no "LegalSource" certified sale has taken place.</p> <p>Lack of purchase from private forest. Only wood from broken chain of FSC and PEFC has been purchased.</p>	

Non-Conformances

Non-conformance reports (NCRs) describe the non-conformances identified during audits. NCRs include defined timelines for the Organisation to demonstrate conformance. MAJOR non-conformances issued during assessments/reassessments shall be closed prior to issuance of the certificate. MAJOR non-conformances issued during annual audits shall be closed within the timeline against standard requirements are shown below:

2023 – no NCR

Observations

Observations (Obs) are issued for the early stages of a problem which does not in and of itself constitute a non-conformance, but which the auditor considers may lead to a future non-conformance if not addressed by the Organisation or where general improvements may be made. Where applicable, all observations are shown below:

Observation #:	01/23
Standard & Requirement:	LegalSource Standard (LS-02) V2.1, 1.1.2 The Organisation shall be legally allowed to carry out commercial activity as relevant to the processing or transport of forest products.
Description of Observation: European Commission has reached agreement on a new law banning the import into or export from the EU market of products and goods - including timber products - linked to deforestation and forest degradation. The new EU Deforestation Regulation (EUDR) also establishes mandatory due diligence for operators - organizations that place timber products on the EU market or export them from the EU - to avoid sourcing products that are linked to deforestation and forest degradation or that do not have been obtained in accordance with the relevant regulations of the country of origin. The new law will enter into force in 2023 and will apply to enterprises from 18 months after that date (approximately mid-2024). In the case of micro-enterprises, it will be 24 months. The new regulation will replace the existing EU Timber Regulation (EUTR). Please refer to our dedicated EUDR website(https://preferredbynature.org/pl/node/1557362) for further information and updates regarding the regulation.	

The organization should check whether the EUDR will apply to its own operations and trade in timber products. If so, the Organization should start preparing to implement the Regulation to ensure that it meets its obligations before the end of the transition period.

Observation #:	02/23
Standard & Requirement:	LegalSource Standard (LS-02) V2.1, 1.2. The Organisation shall ensure the policy is implemented.
<p>Description of Observation: As part of commitment to continuous improvement, Preferred by Nature is moving LegalSource™ certification to the Preferred by Nature Certification. In light of this transition, Preferred by Nature will be working with existing LegalSource-certified businesses to facilitate their transfer to the Preferred by Nature Certification – regulatory scope. This process will conclude by 30 December 2024, aligning with the start of the EUDR enforcement. To ensure a smooth adaptation to the EUDR, we recommend transitioning to the Preferred by Nature Certification concurrently with your 2024 LegalSource audit.</p> <p>Please note that after 30 December 2024, all LegalSource Programme certificates will be deemed invalid, and the use of LegalSource-related claims will be prohibited. Our technical team will be reaching out to affected parties to streamline this transition and address any specific requirements.</p>	
<p>The organization should be prepared to next audit (2024) that will be under the Preferred by Nature certification as part of the Sustainability framework. Applicable will be Annex 1b, annex 2 and annex 3 and annex 5. Annex 4 will be optional.</p>	

OBS 01/22 was closed due to demonstration sufficient knowledge to supply from FSC certified forest outside of Poland (Slovakia).

D. Closed Non-Conformances

Closed Non-Conformances

This section indicates where the Organisation has adequately addressed non-conformances issued during or since the last audit.

Any non-conformances which cannot be closed remain open and appear in Section C (above). Failure to comply with a minor non-conformance results in the NCR being upgraded to major; the specified follow-up action is required by the Organisation or involuntary suspension will take place.

No NCRs issued in 2022 to be evaluated.