

**March 2022**

**Preferred by Nature Guide**

**Sample**

**PEFC Chain of Custody procedures**

**How to use this document**

You may use this document for inspiration on how to develop and structure your own company-specific procedures. Please be aware that this is a generic, fictional example and that you need to develop your own procedures that are specifically tailored to your company set-up and the scope of your certification.

Please note that the following element is used throughout the document:

* Reference to a specific clause in the applicable PEFC standard is given in parentheses. These references will help you to go directly to the Standard and find out why certain sections or elements have been included in the procedures.

**IMPORTANT**

This document is provided by Preferred by Nature as a generic example of a Chain of Custody (CoC) procedure. The company presented in this procedure is fictional and the specific system details are provided merely as examples.

These sample procedures have been designed to help you comply with the PEFC Chain of Custody Standard (PEFC ST 2002:2020) by providing an example of how a CoC procedure may be structured.

This is a voluntary support tool that you may use as a basis for developing your own company-specific procedures. It cannot be applied directly. You always need to develop and tailor your own procedures.

Using this document is not mandatory for achieving certification, and does not imply any guarantee or assurance regarding the conformance level of your actual company procedures.

Although we have made an effort to cover all Standard requirements, we do not provide any guarantee as to the completeness of the procedure.

Please note that the sample procedures in this document cover ONLY THE PHYSICAL SEPARATION METHOD (not the percentage based and credit method).

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**PEFC Chain of Custody procedures  
for Company Ltd**

# Introduction to the procedures manual

In order to ensure our fulfilment of all applicable PEFC requirements, Company Ltd has compiled this Chain of Custody (CoC) manual. The manual is based on the PEFC Chain of Custody Standard PEFC ST 2002:2020, and addresses all applicable requirements of the Standard. The Production Manager is responsible for the maintenance and correct implementation of this manual.

The manual is prepared to help our employees to:

* control the flow of materials throughout the reception, production, storage and shipping processes so that all applicable PEFC requirements are met; and
* ensure that we meet the requirements of the PEFC CoC standard PEFC ST 2002:2020.

# Company background

Company Ltd was established in 2001 and is a mid-sized furniture production company. The company’s total turnover in 2020 was 2.4 million EUR. We employ approximately 50 full-time staff.

Our company facilities include raw material storage, kilns, a sawmill, a planing facility, and final product storage facilities. More information about the company is available in our latest annual report.

# Company commitment to implement and maintain the Chain of Custody requirements in accordance with the Standard

The management hereby declares its commitment to implement and maintain the Chain of Custody requirements in accordance with the Standard (4.3.1.1).

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**Date and signature**

# Responsibilities (4.3)

The person with overall responsibility for compliance with all applicable PEFC requirements is the Production Manager (4.3.2.1).

Responsibilities for separate areas are specified in the relevant parts of the procedures.

Responsibilities are also summarized in the following table (4.3.1.2):

**Table 1. Responsibilities of staff**

|  |  |  |  |
| --- | --- | --- | --- |
| **Area** | **Person responsible** | **Area** | **Person responsible** |
| Training and staff awareness | Production Manager | Product labelling | Foreman |
| Supplier validation and material sourcing | Purchasing Manager | Promotional and off-product use of trademarks | Sales Manager |
| Material reception | Foreman | Sales and shipping documentation | Bookkeeper |
| Production and segregation in processing | Production Manager | Outsourcing | Production Manager |
| Internal audits and management review | Production Manger | Due Diligence System | Purchase Manager |
| Occupational Health and Safety | Production Manager | Check that the invoice includes the correct PEFC CoC code and PEFC claim | Production Assistant |
| Nonconformity and corrective action | Production Manager | Complaint procedures | Production Manager |

Note: The overall responsible person is responsible for any areas not specified in this table.

# Training (4.5.1)

In our company, PEFC-related training is relevant for all full-time employees working with PEFC- certified material. Training covering the full CoC system is provided to all staff based on this manual. Initial training is conducted before initial assessment, and additional brief training is conducted once a year. Records and a list of participants are available in Annex 1. New staff will be personally introduced to this manual before they start work. The Production Manager is responsible for implementing this training procedure (4.5.1).

# Records (4.4)

To enable us to effectively monitor the CoC system, we maintain records covering all steps and elements of our CoC system. Company Ltd records can be available digitally or on paper. The minimum maintenance time for all records is five (5) years (4.4.2).

**Table 2. Summary of the records maintained by Company Ltd related to our PEFC CoC certificate scope:**

|  |  |
| --- | --- |
| **Record name** | **Location** |
| Supplier list | Annexed to this document. |
| Raw material orders | E-mails saved on server, in the folder ”Production”. |
| Purchase waybill | Digitally stored in the accounting programme. |
| Purchase invoice | Digitally stored in the accounting programme. |
| Production orders | Excel files stored on the server, in the folder ”Production”. |
| Production work sheets | Entered into Excel based on paper sheets. Excel files saved on the server, in the folder ”Production”. |
| Product label types used on products | Sample label designs stored on the server, in the folder ”Production”. |
| Occupational Health and Safety | Hard copy stored in the Production Manager’s office and also displayed on the message board. |
| Sales documents | Digitally stored in the accounting programme. |
| Due Diligence System | Hard copy stored in the Production Manager’s office. |
| Internal audit reports | Hard copy stored in the Production Manager’s office. |
| Complaints mechanism and resolution of received complaints | Digitally stored in the accounting programme. |
| Nonconformity and corrective action | Digitally stored in the accounting programme. |
| Outsourcing contract | Stored on the server, in the folder ”Contracts”. |

# PEFC Product Groups (5.1.2.2, 4.2.1 b, 4.4.1)

We have prepared a Product Group list according to the PEFC requirements (Annex 3). The Product Group Schedule describes which products we can produce as certified and specifies which products our certificate covers. The product group list is helpful for our staff, customers, suppliers and any other interested party to understand what is included in our PEFC system (5.1.2.2, 4.2.1 b, 4.4.1). We only use PEFC certified material (either 100% PEFC Origin, 100% PEFC Certified or 70% PEFC Certified) or PEFC Controlled Sources material in PEFC production (6.1.4).

The Production Manager is responsible for maintaining and updating the product group list (Annex 3).

# Material sourcing (5.1)

The Purchase Manager is responsible for purchasing of raw material, for verifying the validity and scope of the supplier’s PEFC certificate on PEFC webpage (5.1.2.1), and for verifying purchase documents (5.1.1).

In PEFC production, we are using PEFC certified material and PEFC Controlled Sources, non-PEFC claimed (other material) is not used. Non-PEFC claimed material is not used (5.1.2.2). Company Ltd purchases the following material categories for its PEFC production (5.1.2.2):

100% PEFC Origin

100% PEFC certified

70% PEFC certified

PEFC Controlled Sources

Raw material is ordered based on our customers’ orders. The Sales Manager, who prepares sales contracts in Excel, will indicate either ”PEFC certified” or “PEFC controlled sources” in the Comments field if the buyer wants the material to be PEFC-certified.

The Purchase Manager is responsible for preparing purchase orders. If certified material is needed, the following is stated on the purchase order: E.g. ”Ordered material must be 70% PEFC certified.” (5.1.2.2).

Before preparing the purchase order or at least every three (3) months, the Purchase Manager must confirm that the supplier has a valid PEFC certificate, via the PEFC database (https://pefc.org/find-certified). It shall also be verified that the supplier has the right to sell the type of material being ordered (5.1.2.1, 5.2.1). All suppliers are recorded in the PEFC Supplier List (Annex 2) for an easy overview of all suppliers and the essential information: company name, contact information, product delivered, PEFC claim, PEFC CoC code and date of latest verification. All suppliers of raw material are entered into our accounting programme by the Bookkeeper. It is possible to extract the details of suppliers of certified material from the accounting programme. The programme also shows the supplied product type (e.g. lumber), material category (can be 100% PEFC Origin) and the PEFC certificate code of the supplier.

Upon receipt of an invoice, the production assistant checks that the invoice includes the correct PEFC CoC code and PEFC claim. If any information is missing, the material cannot be used as certified and related corrections need to be made physically on material pallets and in the accounting programme.

(FYI: It is not a PEFC requirement to have the PEFC CoC code and PEFC claim on both the shipping documents or invoice; it is sufficient if it is stated on one of the documents and the material can be linked to this document, e.g. purchase order number or packaging number.)

# Material receipt and storage (5.1)

The Foreman on duty is responsible for receiving material and checking appropriate information on shipping documents: volume, quantity, dimensions, PEFC CoC Code and PEFC Claim (100% PEFC Origin, 100% PEFC Certified, 70% PEFC certified or PEFC Controlled Sources).

If it is clear that the material is certified and corresponds with the ordered material, the Foreman will see the material unloaded to the lumber storage area and will attach a sticker with the letters ”PEFC” to all certified pallets, so that certified material is always clearly distinguishable. We do not segregate 100% PEFC Origin, 100% PEFC Certified and 70% PEFC certified material. In case of PEFC Controlled Sources, the foreman will attach sticker with letters “PEFC CS”.

If PEFC CoC Code and/or PEFC Claim is missing, the material CANNOT be accepted as certified and is not labelled with internal PEFC labels.

# Production (6.2)

Production of certified products is conducted as separate production orders for each product number and is registered with a specific order number in the system. We are producing either material with “70% PEFC Certified” or “PEFC Controlled Sources” claim.

The production order is based on specific identification of all raw materials and components used for the production of certified products at all stages of the process, including raw material stock. When producing “PEFC Controlled Sources” material, material can be either labelled as “PEFC” or “PEFC CS”. When producing “70% PEFC material” only “PEFC” material is used. Production Manager is preparing order forms and ensures that appropriate material is used.

To ensure physical separation, all order forms and pallet labels in the production process refer to specific orders and/or lot numbers.

# Sales and delivery (5.2)

All products sold as certified are sold with ”70% PEFC certified” or “PEFC Controlled Sources” claim(5.2.1, 5.2.2).

All PEFC-certified products are created in the system with unique production numbers, where the Sales Manager in cooperation with the Purchasing Manager specifies the applicable PEFC claim and PEFC CoC code in the item text. Example: 70% PEFC certified, NC-PEFC/COC-XXXXXX or PEFC Controlled Sources, NC-PEFC/COC-XXXXXX

When the product is created in this way, all the above PEFC-related information is automatically transferred to all sales documents (order confirmation, waybills and invoices etc.), one item line with PEFC information for each product.

This covers the following information (5.2.1):

1. Name and contact details of Company Ltd – these are permanently included in the invoice template
2. Name and address of the customer – the specific buyer is selected from the database
3. Date when the document was issued – this is entered by the Bookkeeper
4. Description of the product – the same product code is selected as on the waybill
5. Quantity of products sold – entered by Bookkeeper based on the waybill
6. Company Ltd’s PEFC certificate registration code – the code appears automatically if the invoice template for certified material is selected
7. A PEFC claim (e.g. 70% PEFC certified or PEFC Controlled Sources) – the claim is tied to the product and the correct claim appears automatically when specific certified product types are selected from the database.

# PEFC trademark use (5.3)

The Foreman and Sales Manager shall at all times be aware of the applicable PEFC logo requirements according to the standard PEFC ST 2001:2020 (5.3.1).

A logo license is requested from our local PEFC office before the first use of PEFC Logo (5.3.2).

Our own PEFC certificate is made available to customers on our website:

www.companyltd.com/about us

# Physical separation method implementation (6.2.1)

Company Ltd is using the physical separation method for producing PEFC-certified products. We maintain physical separation of all PEFC-certified material used for PEFC production, from non-certified material through reception, processing, packing and shipping (6.2.1).

The Production Manager, who prepares production orders, is responsible for clearly indicating “PEFC” or “PEFC CS” if the material must be produced either as PEFC-certified or as PEFC controlled sources.

For certified production orders, the Foreman must ensure that only certified material is used. All certified raw material is labelled with the letters “PEFC” and is clearly distinguishable.

For PEFC controlled sources production orders, the foreman must ensure that either PEFC-certified or PEFC Controlled Sources material is used. Suitable raw material is labelled as “PEFC CS” or “PEFC”, but “PEFC CS” is always preferred.

After the first processing stage, a green tracking label with the letters “PEFC” is attached to the pallet. For “PEFC CS” material yellow tracking label is used. This ensures that PEFC-certified material is always clearly distinguishable during production. All production staff must ensure that only the green tracking label is used for PEFC-certified material and yellow tracking label for PEFC controlled sources.

It is the responsibility of all staff to ensure that no non-certified material is mixed with PEFC material for orders where a green or yellow tracking label is used (it is acceptable to use PEFC-certified material to produce non-certified products).

# Outsourcing (4.9)

Outsourcing is to be understood as the process where subcontractors handle PEFC-certified material.

The subcontractor receives the material which is physically separated from other material, and returns the material to the organisation when the subcontracted work is completed.

The outsourcing process is covered by this procedure, and **Company Ltd** subcontractors are included within the internal audit procedures (4.9.1, 4.9.2).

The following requirements are followed when using subcontractors:

* A written agreement (Annex 5) shall be made between Company Ltd and the subcontractor (4.9.2).
* Preferred by Nature shall be informed of new agreements and grant approval before any outsourcing takes place.
* The subcontractor shall keep all company material physically separate in secure and identifiable units.
* The subcontractor shall keep all certified material physically separated from all other material during the entire process.
* The subcontractor shall keep all final products physically separated in secure and identifiable units.
* The subcontractor shall keep all relevant documents related to the outsourcing process and products.
* The materials must all be owned by Company Ltd.
* Company LTd. has access to the subcontractor’s site for internal and external auditing of outsourced activities.
* A list of subcontractors must be implemented and kept up-to-date.

# Occupational health and safety (4.7)

The Production Manager is responsible for securing Occupational Health and Safety at Company Ltd.

Company Ltd has established procedures for ensuring Occupational Health and Safety. A hard copy is stored in the Production Manager’s office and is also displayed on the message board.

Company Ltd has a training plan covering Occupational Health and Safety. All new workers are trained on the company’s established health and safety policy during their initial orientation and additional training is conducted as the need arises. Training records are maintained for at least five (5) years.

Company Ltd. confirms that:

* workers are not prevented from associating freely, choosing their representatives and bargaining collectively with their employer
* forced labour is not used
* workers under the age of 15 are not used
* workers are not denied equal employment opportunities and treatment
* working conditions do not endanger safety or health

# Internal PEFC audit (4.6)

The Production Manager is responsible for conducting an annual internal audit of the CoC system. Internal audit will be conducted at least annually and before initial audit.

At a minimum, the following details must be audited:

* Sampling of incoming delivery notes and invoices since last internal/ external audit – Checking correct use of PEFC CoC Code and Claim according to supplier list and product group schedule
* Sampling of outgoing delivery notes and invoices since last internal/ external audit – Checking correct use of PEFC CoC Code and Claim according to materials purchased
* Interviews of staff involved in the CoC system, ensuring that all relevant staff have knowledge of and understand the procedures relevant to their area of responsibility

A summary from the internal audit is prepared including details such as (Annex 4):

* Internal auditor’s name
* Date of the audit
* Names and functions of staff interviewed
* Conclusion – including a description of Non-Conformity Reports (NCRs) and observations
* List of corrective actions implemented to address NCRs
* Management signature

# Annual PEFC audit

Prior to the annual external PEFC audit, the following documentation is prepared and submitted to our Preferred by Nature contact person, at the latest three (3) days prior to the agreed audit date:

* Updated PEFC procedure
* Updated documentation for executed training (Annex 1)
* Updated list of suppliers (Annex 2)
* Updated Product Group Schedule (Annex 3)
* Outsourcing agreements, if applicable
* List of subcontractors with PEFC-certified production, if applicable

# Complaint mechanism (4.7)

On reception of a written complaint from a supplier, customer or other party in relation to the CoC certification of Company Ltd, it must be ensured that:

* receipt of the complaint is formally acknowledged to the complainant within 10 workdays;
* information needed to evaluate the size and relevance of the complaint is collected;
* the conclusion on the complaint and, if applicable, an action plan is formally communicated to the complainant; and
* relevant corrective actions are implemented, if necessary.

# Nonconformity and corrective action (4.8)

When a nonconformity is identified through internal or external auditing, Company Ltd shall:

* react to the nonconformity and, as applicable:
  + take action to control and correct it
  + deal with the consequences
* evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:
  + reviewing the nonconformity
  + determining the causes of the nonconformity
  + determining if similar nonconformities exist, or could potentially occur
* implement any action needed
* review effectiveness of any corrective action taken
* make changes to the management system, if necessary

Company LTd maintains documented information of all nonconformities and the results of corrective action.

# Due Diligence System (Section 7)

We are required to implement a Due Diligence System (DDS), according to the requirements of the PEFC Standard (please see the description below).

We accept only PEFC claimed material, either PEFC-certified or PEFC controlled sources materials, as inputs to PEFC product groups. Therefore, we don’t need to carry out risk assessment, while we can consider that this material has negligible risk of originating controversial sources.

We must secure access to information on country of origin and species. Upon request, we will provide this information to PEFC certified and uncertified entities further down the supply chain. If we do not have this requested information, the request will be passed on to our supplier.

Suppliers must sign an agreement declaring that this information will be provided if needed.

NB! Information on species and country of origin does not necessarily have to be exact for each delivery. It is sufficient if we have access to information on the potential country of origin and species included in the products.

In case, that there are internal or external substantiated concerns on the origins of material from controversial sources, we will follow up on these concerns according to Appendix 1, 4 of the PEFC Chain of Custody standard.

Along with this procedure, we have a commitment in place covering all of the forest and tree based material inputs to our facility to ensure that if we are notified or have received a substantiated concern that these materials originate from illegal sources, then we carry out further investigation. Our suppliers and our investigation must verify that delivered material has “negligible risk” of originating from illegal sources (controversial sources). NB! This requirement applies not only to our PEFC product groups covered by our certificate, but applies to all wood-based materials handled within our company.

If a third party raises suspicion against us regarding our supplier not being in compliance with legal requirements and other aspects of controversial sources, these accusations will be investigated and, if found valid, a (re)evaluation of the risk will be made OR the supplier will be excluded from delivering PEFC-certified materials.

In case of reasonable suspicion, any materials previously excluded from risk evaluation will be evaluated according to the requirements of the standard, or will be excluded as inputs in PEFC product groups.

# Annex 1: Documentation for training of staff

The following members of staff have received training related to PEFC certification and these Chain of Custody procedures:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Name** | **Job title and function** | **Topic of the training** | **Training date** | **Name of the trainer/instructor** |
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# Annex 2: PEFC Supplier List

This list is verified every 3 months at <https://pefc.org/find-certified>

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Supplier**  (Name and address) | **Product type**  (Description of the product) | **Material category**  (100% PEFC Certified or XX% PEFC Certified) | **PEFC CoC code** | **Date of latest verification** |
|  |  |  |  |  |
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# Annex 3: PEFC Product Group List

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **PEFC product group**  **(description of the product)** | **Product type & code**  **(see list on following page)** | **Output PEFC category** | **Species**  **(choose from drop-down menu)** | **Input PEFC category(ies)** | **Control system for  PEFC claims** | **Sites** |
| Wood for construction | 03020  Sawn wood |  |  |  |  |  |
|  |  |  |  |  |  |  |
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# Annex 4: Internal PEFC audit report

|  |  |  |  |
| --- | --- | --- | --- |
| Audit date | XX-XX-XXXX | Name of internal auditor |  |
| Conclusion | | (Were any non-conformances found in the CoC system?) | |
| Interviews | | (Name and function of interviewed staff members) | |
| Documentation | | (Which documents were reviewed?) | |

|  |  |
| --- | --- |
| NCR number: | XX-2021 |
| Description of Non-conformance and related documentation/evidence: | |
| (Describe form and scope of the observed non-conformance) | |
| Corrective Action Request: | (Which corrective actions have been implemented to close the non-conformance, and what has been done to ensure that the error does not occur again?) |
| NCR conformance deadline: |  |
| Comments (optional): |  |

# Annex 5: Outsourcing agreement template

|  |  |
| --- | --- |
| **Certificate Holder’s PEFC CoC Certificate Code:** |  |
| **Primary Contact for the Certificate:** |  |
| **Contractor’s Company Name:** |  |
| **Contractor Contact Person:** |  |
| **Location of Contractor:** |  |
| **Description of Outsourcing Arrangement:** |  |

**General Terms for Outsourcing:**

1. The Contractor shall track and control all materials that are outsourced for use in PEFC-certified products to ensure they are not at risk of mixing or being contaminated with any other materials during the outsourcing arrangement.
2. The Contractor shall use only the material provided by the PEFC Certificate Holder for products covered by this outsourcing arrangement.
3. The Contractor shall maintain records of inputs, outputs, and shipping documents associated with all material processed during the outsourcing arrangement.
4. PEFC Certificate Holder shall issue the final invoice for the PEFC-certified products following the outsourcing arrangement.
5. The Contractor shall not use the PEFC or Preferred by Nature trademarks for promotional use or on any products not included in this outsourcing arrangement.
6. The Contractor shall not further outsource processing of the material to any other entity.
7. The Contractor shall allow Preferred by Nature to conduct audits of its operation, including on-site evaluation, as part of its auditing of the PEFC Certificate Holder.

**Specific Terms for this Outsourcing Arrangement:**

1. {IF APPLICABLE} The Contractor shall only apply the PEFC labels provided by the PEFC Certificate Holder to the PEFC-certified products covered by the scope of this outsourcing arrangement and agreement.
2. **{LIST ADDITIONAL TERMS SPECIFIC TO THIS OUTSOURCING AGREEMENT}**

|  |  |
| --- | --- |
| Certificate Holder | Contractor |
| Signature\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | Signature\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |



**About us**

Preferred by Nature (formerly NEPCon) is an international non-profit organisation working to support better land management and business practices that benefit people, nature and the climate. We do this through a unique combination of sustainability certification services, projects supporting awareness raising, and capacity building.

For more than 25 years, we have worked to develop practical solutions to drive positive impacts in production landscapes and supply chains in 100+ countries. We focus on land use, primarily through forest, agriculture and climate impact commodities, and related sectors such as tourism and conservation. Learn more at [www.preferredbynature.org](http://www.preferredbynature.org)

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