



Robert Horne Group

Chain of Custody

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1. Introduction

Chain of Custody (CoC) is the means of tracing a paper product up through the supply chain back to where the fibre originated. It includes all the operations that take physical or legal ownership of the paper or physically alter it (with the exception of retailers and the end user).

This means that in practice, a certified product can be tracked through every link in the chain, so that buyers can be guaranteed that fibre originated from a forest (or recycling plant) managed according to the rules of the certification scheme.

In order for printers to get CoC, an independent assessor will visit and check the printer's ability to prevent certified paper becoming mixed up with unapproved material. They will want to look at documentation and records relating to certified material bought and sold and will also examine the handling of incoming material, how it is processed and how it is dispatched. In particular, they will be investigating 'critical control points' where there is the greatest risk of material becoming mixed. Annual audits are required.

The FSC and PEFC schemes require separate CoC certification but it is possible to be audited for both at the same time.

2. Who needs Chain of Custody?

Anyone that wants to sell on a product as certified needs to have CoC certification for the relevant scheme (FSC or PEFC), with the exception of retailers.

Therefore, any printer buying certified paper and wanting to use the FSC or PEFC label on a customer's job (or make any reference to FSC or PEFC) needs to be CoC certified.

The end-user organisation does not normally need CoC. However, where the end-user purchases the paper directly, rather than just purchasing the finished print job, they will need CoC and have a system in place for controlling their printers to ensure certified material is used. Such a system can also apply to publishers that buy their own material.

3. About the FSC

The Forest Stewardship Council (FSC) is an international, non-governmental organisation dedicated to promoting responsible management of the world's forests. It was founded in 1993 in response to public concern about deforestation and demand for a trustworthy wood-labelling scheme. Environmental groups including WWF, Greenpeace, Friends of the Earth and the Woodland Trust support it.

FSC has developed a system of forest certification and product labelling that allows consumers to identify wood and wood-based products from well-managed forests (or recycled sources).

Forests are inspected and certified against standards based on FSC's 10 Principles of Forest Stewardship. These inspections are undertaken by independent organisations, such as the Soil Association, that are accredited by the FSC. In order to be given FSC certification a forest must be managed in an environmentally appropriate, socially beneficial and economically viable manner. Forests that meet these standards are given FSC certification and the timber product allowed to carry the FSC label. Further details at www.fsc.org

4. About the PEFC

PEFC stands for the Programme for the Endorsement of Forest Certification Schemes and is an international, non-profit organisation that is primarily made up of representatives of the forest products industry. Unlike the FSC, it does not set specific standards but is an umbrella brand that incorporates different national forest certification schemes (e.g. the national scheme in Finland is endorsed by the PEFC). This is intended to make the forest certification easier and more applicable to different types of forests.

While it continues to make improvements, the PEFC scheme is still sometimes criticised by environmental groups for being too variable from country to country and not always addressing conservation and social issues satisfactorily. PEFC certified products have therefore been less in demand from end-users than FSC certified grades. Further details at www.pefc.org

5. Auditors

The following are accredited auditors that can be contacted to assess a company for CoC certification.

BM Trada Certification Ltd	01494 569700	www.bmtrada.com	FSC & PEFC
CATG Ltd	01524 400 632	www.catg.co.uk	PEFC
Control Union Certifications UK	01363 777504	www.controlunion.com	FSC
Print & Media Certifications Ltd	01827 64471	www.printcertification.co.uk	FSC & PEFC
Rainforest Alliance SmartWood Program UK Office	01476 860 788	www.smartwood.org	FSC
SGS Qualifor UK	0121 521 3708	www.qualifor.com	FSC & PEFC
Soil Association Woodmark Scheme	0117 914 2435	www.soilassociation.org/forestry	FSC

6. Costs and Timings

Costs depend on the size of company, the number of sites, the auditor and whether FSC and/or PEFC certifications are being applied for. However a ballpark figure of £1500 should be considered for the first audit. Subsequent audits may be cheaper. Small companies may be able to reduce costs by joining a group certification scheme.

Arranging a suitable date with the auditor can be the factor dictating timings. Three months is a typical timeframe to achieve CoC certification but it is possible to achieve more quickly.

7. Chain of Custody checklist for printers

Achieving CoC is relatively straightforward and most printers will have many of the requirements of already in place. It is not necessary to have management systems such as ISO9001 or ISO14001, although experience of these will be beneficial.

In preparation for a CoC audit, the following are points to consider.

- A procedure document will need to drawn up. This can be a simple bullet-point list, as long as it outlines how you comply with the requirements of chain of custody. If desired, the procedures can be written in to an existing document, such as a quality or environmental management system.
- Assign responsibilities for maintaining the CoC system. Everyone involved in the system will need to have at least basic knowledge of the purpose and requirements of Chain of Custody (e.g. buyers, goods inwards, press operators etc).
- When purchasing material for certified jobs, ensure that the buyer specifies to the supplier that the product must be certified.
- Ensure that goods inwards personnel check that material to be used for certified jobs is actually certified. Certified products should be identified as such on the delivery note (they need not necessarily be labelled as certified). If required, seek assurance from suppliers that the necessary descriptions will be on paperwork.
- Designated storage areas for certified material are not required. However, it is important that any material can be identified and can be traced to the supplier's delivery note or invoice. This also applies to any material held in stock.
- A process is required to ensure that certified material is used for a certified job. Consider how, at any stage of production, it can be proven that the material being used is certified. For example, having a job number assigned to the material, from which the order and subsequent supplier's invoice can be traced, can be an appropriate method.
- If other sites or third parties may be involved in the job (e.g. external finishers), consider how these will be controlled to ensure material is not mixed. A written agreement may be required. The auditor may want to visit other sites or third parties.
- Records will need to be kept. These include the CoC certificates for any suppliers providing certified material, plus invoices and delivery notes for all certified material bought. For subsequent audits data related to the quantities (e.g. tonnage) of certified material bought and sold will need to be available.
- For PEFC CoC an internal audit of the system needs to be undertaken annually.
- Once certified, a certificate with a unique Chain of Custody number shall be provided. A logo pack will be available for use with the CoC number. There are rules for using logos that must be followed and any deviation from these must be authorised by the auditor. The choice of logo may depend on the material being used – the supplier should be able to advise which is appropriate.
- Delivery notes and invoices for any certified job need to contain an appropriate FSC or PEFC description and the printer's CoC number.

Please note, the information in this publication is for guidance only