EUROPEAN FLAX® CERTIFICATION PROCESS





EUROPEAN FLAX[®] Certification Process version 2.0

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GP01 - Description of the EUROPEAN FLAX[®] Certification Process

Article 1 Object

This document provides a definition of the EUROPEAN FLAX[®] certification awarding process for companies concerned by the EUROPEAN FLAX[®] standard.

Article 2 EUROPEAN FLAX[®] standard

The EUROPEAN FLAX[®] Standard defines the EUROPEAN FLAX[®] chain of custody, and specifies all the stages it applies to, from fibre trader to finished product, while distinct Specifications apply for cultivation and scutching (see traceability chain diagram and detailed information in the Standard).

The Standard also defines the Technical criteria against which are going to be verified by conformity assessment. It is available on www.europeanflax.com

Article 3 Bureau Veritas Certification Auditors

Bureau Veritas Certification primarily uses full time employed auditors so as to place greater emphasis on:

- Stakeholder confidentiality.
- Consistency in terms of approaching audits and standards.
- Auditor availability.

All auditors are qualified in accordance with the ISO 17021 standard requirements. They are all highly experienced both in the fields of industry or services and in management system auditing for the activities concerned.

They are designated for the certification audits according to the three following criteria:

- Expertise in the company's business area.
- Proximity of the company's facilities.
- Availability on the certification dates requested by the company.

Bureau Veritas Certification auditors foster a field-oriented and pragmatic approach. Above all, they evaluate the management system as a tool used by the company to manage its activities successfully and improve them.

Article 4 Certification proposition

Application

Companies wanting to receive the EUROPEAN FLAX[®] certification shall sign with the CELC the EUROPEAN FLAX[®] Terms of Use (downloadable on <u>www.europeanflax.com</u>). The company shall then contact Bureau Veritas Certification Local Office (List on <u>www.europeanflax.com</u>) and send the completed Request for quotation RFQ.

This document gathers the following pieces of information:

- Company name, address and phone number
- List of concerned sites
- Activities carried out (processes, products, clients, etc.)
- Company structure (number of sites, number of employees, etc.)
- Subcontractors whenever relevant

The company completes the document and returns it to Bureau Veritas Certification and CELC.

Certification Offer

CELC and Bureau Veritas Certification have defined a unique and global certification price per company, per site and per activity

On the basis of the information given by the company, Bureau Veritas Certification (Local Office) develops a certification proposal.

The technical and business proposal established by Bureau Veritas Certification covers the initial assessment (year 1) and the monitoring audits (year 2 and 3) supporting the maintenance of the certificate.

The proposition may or not include composition testing, but does not include any potential complementary and additional audit that may be required if the company management system does not meet the selected standard.

EUROPEAN FLAX® certification contract

The technical and business proposal accepted and signed by the company constitutes the certification contract.

On that document, the company can indicate its preferred time period for the audit. Upon receipt of that document, Bureau Veritas Certification carries out its contract review and prepares the certification audit by setting up the audit team, scheduling the audit timetable (planned on site audit date or documentary audit date).

Article 5 Standard conformity assessment

The conformity assessment against the EUROPEAN FLAX[®] standard is performed by Bureau Veritas Certification as follows:

Year 1: Certification awarding – Initial Audit

The conformity assessment against the EUROPEAN FLAX[®] standard is an **audit** based on documents provided by the company. These documents are detailed in the EUROPEAN FLAX[®] Checklist. The company shall review the EUROPEAN FLAX[®] standard, certification process and checklist before the audit (all available on <u>www.europeanflax.com</u>).

In Addition, the audit is also covering the company's subcontractors. During the audit of the subcontractors, the company works together with their subcontractors to collect all the documents requested and provide them to the auditor.

The audit starts with an <u>opening meeting</u> as a phone meeting between the auditor and the company, which allows in particular to:

- Confirm the scope of certification, which should appear on the certificate.
- Check all requested documents have been provided to the auditor
- Select purchase and sale invoices which have to be provided to the auditor during the audit (in a 2-hours timeframe)
- Check that the company has performed audits of all their subcontractors through requested documents.

The auditor proceeds then to the documentary review of the documents provided before and during the audit (sample of selected invoices and complementary information whenever relevant).

The auditor writes a report. Non-conformities are identified in this report, if relevant. They are formalized through a non-conformity report (SF02 form –Non-conformity Report).

Non-conformities always meet the three following criteria:

- They are non-biased and based on a failure to comply with a requirement set forth in the EUROPEAN FLAX[®] standard.
- They are based on evidence and in no event on presumptions.
- They are understood and accepted by the company.

The company may undertake corrective actions in order to resolve non-conformities.

The audit ends with a <u>closing meeting</u> as a phone meeting between the auditor and the company, which allows in particular to:

- Present the audit results and its conclusions.
- Presents any non-conformity reports (SF02) that have been issued.

Should the provided documents not be sufficient to finalize the conformity assessment, the auditor may request a complementary on-site audit at the company expenses.

The company shall implement corrections, corrective actions and preventive actions within a maximum of 90 days.

Certification decision and certificate issuance

Once all non-conformities have been resolved the auditor recommends the company for certification to the Bureau Veritas Certification France EUROPEAN FLAX[®] certification committee (Technical Management).

The role of this committee is to check that the certification procedures are properly applied and to issue the EUROPEAN FLAX® certification decision.

Bureau Veritas Certification France Technical Management may request further information or an onsite audit before giving its opinion or subject its decision to an extra audit.

Once a positive certification decision is finalized Bureau Veritas Certification provides to the company the EUROPEAN FLAX[®] certificate and informs CELC, so that the Authorization of Use becomes effective and the Company can receive EUROPEAN FLAX[®] marketing tools.

Year 2: Certification confirmation – Surveillance Audit 1

The company shall check the last updated version of the EUROPEAN FLAX[®] standard, certification process and checklist before the audit (all available on <u>www.europeanflax.com</u>).

A sample of the company's subcontractors may be audited on-site during additional audit time (cf. Annex 1 for sampling rules of subcontractors).

The on-site audit starts with an <u>opening meeting</u> which allows in particular to:

- Confirm the scope of certification, which should appear on the certificate.
- Select purchase and sale invoices which have to be provided to the auditor during the audit

During the on-site audit, the auditor checks:

- Consistency between information/documents provided during the year 1 documentary on-site audit and the on-site implementation.
- Maintenance during the 2nd year of conformity against the EUROPEAN FLAX[®] standard.

The auditor writes a report. Non-conformities are identified in this report, if relevant. They are formalized through a non-conformity report (SF02 form –Non-conformity Report). Non-conformities are handled applying the same conditions as for the initial certification (year 1).

The audit ends with a <u>closing meeting</u> which allows in particular to:

- Select references to be tested: sample to be transmitted for composition analysis to one of the accredited laboratories, by using the appropriate form available on <u>www.europeanflax.com</u>. Composition tests are not mandatory for scutchers, pre-processors, traders selling non-transformed materials and finished products manufacturers.
- Present the audit results and its conclusions, subject to the validation of fibres' composition tests results.
- Presents any non-conformity reports (SF02) that have been issued.

The audit report is finalized when the auditor receives the fibres' composition tests of references selected during the closing meeting.

Once all non-conformities have been closed the auditor recommends the company for the maintenance of the certification to the Bureau Veritas Certification France EUROPEAN FLAX[®] certification committee (Technical Management). The role of this committee is to check that the certification procedures are properly applied and to confirm the EUROPEAN FLAX[®] certification maintenance.

Bureau Veritas Certification France Technical Management may request further information or an onsite audit before giving its opinion or subject its decision to an extra audit.

Year 3: Surveillance – Surveillance Audit 2

Bureau Veritas Certification confirms maintenance of conformity against EUROPEAN FLAX® standard.

The company shall check the last updated version of the EUROPEAN FLAX[®] standard, certification process and checklist before the audit (all available on <u>www.europeanflax.com</u>).

The conformity assessment against the EUROPEAN FLAX[®] standard is an **audit** based on documents provided by the company. The audit is also covering the company's subcontractors as for year 1 audit. The audit process is the same as year 1.

In addition, the <u>closing meeting</u> between the auditor and the company will also allow to select references to be tested: sample to be transmitted for composition analysis to one of the accredited laboratories, by using the appropriate form available on <u>www.europeanflax.com</u>. Composition tests are not mandatory for scutchers, pre-processors, traders selling non-transformed materials and finished products manufacturers.

The audit report is finalized when the auditor receives the fibres' composition tests of references selected during the closing meeting.

Note: Initial Audit (year 1) and Surveillance Audit 2 (year 3) may be performed off-site as documentary audits, except in China, where all the audits are performed on-site.

Article 6 Renewal audit

A renewal audit should be carried out before the end of the certification cycle. Its range takes into account the results of the last monitoring audits. A new contract is submitted to the company at that expiry date.

It is planned at least **three months** before the previous certificate expires. The company should implement corrective actions following any non-conformity report **before the previous certificate expires**. Handling terms are the same as for the initial certification.

Article 7 Extension of the scope of certification

At any time the certification may be extended or reduced in order to:

- Include or remove sites in the scope of certification.
- Include or remove activities carried out within the company.
- Cover new certification standards or take into account new development regarding the standard or accreditation rules.

The extension is generally carried out as part of the surveillance audits in order to minimize any extra costs it may generate.

Depending on the circumstances Bureau Veritas Certification can launch a specific audit in order to validate the certification extension.

When the extension is foreseeable the certification contract provides for such a disposition. Otherwise, an amendment to the contract will be executed so as to tailor audit times and the sites to be audited accordingly.

Article 8 Suspension or withdrawal of certificate

Bureau Veritas Certification reserves the right to suspend or withdraw a certificate that has been issued at any time during its period of validity.

A certificate can be suspended in any of the following cases:

- The company does not provide admissible responses within the announced deadlines following non-conformity reports.
- The company makes improper use of the certification marks EUROPEAN FLAX©.
- The company does not follow terms determined by the CELC, in particular the Terms of Use and the graphic charter.
- The company does not comply with the technical and business agreements entered into with Bureau Veritas Certification.
- The company did not allow for the conduct of the surveillance or renewal audits at the scheduled dates, especially when invoices are not paid within the contractual deadlines, thus making it impossible to schedule any upcoming audit.
- The company requests it.

During the suspension time period the company must refrain from actively advertising its certification and immediately stop to sell EUROPEAN FLAX[©] certified products.

The time period for a suspension is three months and may be extended once. The certification may be reinstated providing supporting documents are submitted or after a satisfying audit.

In case of failure the certificate will end up being withdrawn and the contract cancelled. The company will stop advertising its previous certification.

Bureau Veritas Certification may communicate on a certificate being suspended or withdrawn.

Article 9 Confidentiality

The office staff and Bureau Veritas Certification auditors are committed to handling any information or any document which they may be informed of during an audit in a strictly confidential manner.

Confidentiality may be suspended in the following cases:

- Legal reason or administrative request.
- Written consent given by the company.

Article 10 **Observer participation to audits**

Bureau Veritas Certification France may associate observers to its certification or surveillance audits.

Those observers may be:

- Bureau Veritas Certification internal auditors (as part of our internal audit activities).

- Bureau Veritas Certification auditors in-training.

In all cases, the presence of observers is subject to the company's consent.

Annex 1: Sampling rules of subcontractors for on-site audits

| Subcontracted activity | Risk | Sampling of subcontractors |
|---|------------|----------------------------|
| Transportation and warehouse. | Negligible | No audit required. |
| Finished product manufacturing and fibre pre-processing | Low | No on-site audit required. |
| Dying, weaving, and knitting. | Medium | 0,6√n* |
| Spinning | High | √n |

*n= number of subcontractors covering these subcontracted activities