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**LegalSource™ Certification  
Surveillance Audit 2016**

**Report for:  
Solid Parkiet s.c.  
in  
Wojnicz, Polska**

Report Finalized: 25 January 2017  
Report Format: Confidential  
Audit Dates: 27 October 2016  
Audit Team: Piotr Nowak

Type of certificate: Single  
Certificate code: NC-LS-017279  
Certificate issued: 24 Nov. 2014  
*Report based on Standard(s): LegalSource Standard [ver.1.0]*

Organisation Contact: Ewa Szczupak  
Address: ul. Wolicka 7, 32-830  
Wojnicz, Poland

1. INTRODUCTION .....	3
2. AUDIT CONCLUSIONS .....	4
Audit Recommendation.....	4
Non-conformity Reports (NCRs).....	4
Observations .....	5
Actions taken by Organisation Prior to Report Finalization .....	6
3. AUDIT PROCESS.....	7
Audit Team .....	7
Description of Audit Process .....	7
4. COMPANY DETAILS .....	9
Contacts .....	9
Certificate Scope .....	9
Organisation Scope .....	10

## 1. 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 NEPCon auditors who have evaluated organisation systems and performance against the applicable requirements. Section below provides the audit conclusions and any necessary follow-up actions by the organisation through non-conformity reports (NCR).

Dispute resolution: If NEPCon clients encounter organisations or individuals having concerns or comments about NEPCon and our services, these parties are strongly encouraged to contact relevant NEPCon regional office. Formal complaints and concerns should be sent in writing.

## 2. AUDIT CONCLUSIONS

### Audit Recommendation

Based on Organisation's conformance with LegalSource requirements, the auditor makes the following recommendation:

- Certification approved:  
NCR(s) closed

Additional comments: The scope of the LegalSource certificate and material procurement due diligence system of Organisation is limited to the internal EU market. Organization sources its wood entirely from Poland. No import takes place. In the 2014 - 2016 period, no "LegalSource" certified sale has taken place.

Potentially for LegalSource production, FSC-certified FMUs are used as original source of the wood and one private forest located near organization location.

### Non-conformity Reports (NCRs)

*Note: NCRs describe evidences of Organisation non-conformances identified during audits. NCRs include defined timelines for the Organisation to demonstrate conformance. MAJOR NCRs issued during assessments/reassessments shall be closed prior to issuance of certificate. MAJOR NCRs issued during surveillance audits shall be closed within timeline or result in suspension.*

In 2016 no NCRs have been issued.

NCRs raised in 2015:

<b>Issued for: Solid Parkiet s.c. Wojnicz, Poland</b>			
<b>NCR: 02/15</b>	<b>NC Classification:</b>	<b>MAJOR</b> <input type="checkbox"/>	<b>Minor</b> <input checked="" type="checkbox"/>
<b>Standard &amp; Requirement:</b>	NEPCon LegalSource Standard, version 1.0; criteria 4.1.		
<b>Report Section:</b>	Appendix A, point 4.1		
<b>Description of Non-conformance and Related Evidence:</b>			
Organization has implemented procedures (Exh. 1, p.4.3) covering the requirement of DDS performance monitoring that is based on ISO internal auditing system (point 5.3 ISO Quality Book), on-going CoC revision of suppliers and supplies as well as on communication established with NEPCon to detect potential changes in standard requirements. Due Diligence System revision is made at least on an annual basis. The 2015 internal review was conducted in September 2015 and report presented during audit. However, the internal review did not reveal loopholes in the list of qualified suppliers regarding the name change of suppliers and 1 new supplier. See closed NCR 01/15 for details.			
<b>Corrective action request:</b>	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.		

	Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
<b>Timeline for Conformance:</b>	By the next annual surveillance audit.
<b>Evidence Provided by Organisation:</b>	Internal audit review protocol. Exh 5.
<b>Findings for Evaluation of Evidence:</b>	In 2016, an internal DDS review has been conducted and reported (24 October 2016). Protocol has presented during audit. System review performed by auditor confirmed the accurate findings. No NCRs issued.
<b>NCR Status:</b>	<b>Closed</b>
<b>Comments (optional):</b>	N/A

**Observations**

*Note: Observations are issued for the early stages of a problem which does not of itself constitute a non-conformance, but which the auditor considers may lead to a future non-conformance if not addressed by the organization; observations may lead to direct non-conformances if not addressed.*

<b>OBS: 01/16</b>	<b>Standard &amp; Requirement:</b>	NEPCon LegalSource Standard, version 1.0; criteria 7.5: <i>The risk assessment shall be revised at least annually and whenever changes occur to the supply chain that could alter the risk characteristics of that supply chain.</i>
	<b>Report Section</b>	Appendix A. Point 7.5
<b>Description of findings leading to observation:</b>	Organisation is required to review its risk assessment annually.	
<b>Observation:</b>	Organization should consider in future revisions of its risk assessment - among other sources used - any findings available via the National Risk Assessment (NRA) process, conducted by FSC Poland. On 1//12/15, the FSC NRA was revised and uploaded to: <a href="https://ic.fsc.org/en/our-impact/program-areas/controlled-wood-01/controlled-wood-risk-assessments/fsc-risk-assessment-database">https://ic.fsc.org/en/our-impact/program-areas/controlled-wood-01/controlled-wood-risk-assessments/fsc-risk-assessment-database</a> which provides valuable information on risk and which can	

	be considered in future revisions of risk assessments.
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### **Actions taken by Organisation Prior to Report Finalization**

N/A

### 3. AUDIT PROCESS

#### Audit Team

Auditor(s)	Qualifications
Piotr Nowak	<p>Internal NEPCon Course in Wood Legality, LegalSource auditing and certification, Jaroszowice, Poland 2012</p> <p>National Forest Management auditor course of PEFC FM for Polish State Forestry at Forestry University SGGW Warsaw, Poland 2011</p> <p>International auditor training course of Forest Management, Chain of Custody and Controlled Wood in Riga (Estonia) 2010 and Kraków (Poland) 2011</p> <p>Management Faculty in Ecology &amp; Management Academy, Warsaw 1998.</p> <p>Forestry Technical Management study at 5 years Forestry Technical High School, Warcino, Poland accomplished 1989 - 1994.</p> <p>Health and safety, chainsaw operator and wood processing training courses and experience.</p> <p>Auditor COC for wood industry in Poland, Romania and Bulgaria. FM auditor in state forests (RDSF) in Poland.</p> <p>Employee of NEPCon Sp. z o.o. Contact: pn@nepcon.net, mob. +48 603 366 495</p>

#### Description of Audit Process

2016 annual evaluation process has been conducted on-site on 27th October 2016 at the main office and factory site location - Wojnicz, near Tarnów, Poland and at sampled supplier's locations (forest owner).

The owners of the company, daily management staff, ISO responsible person and auditor were present at the opening meeting. Organization was informed about data and information protection policy as well as the methodology of the auditing and approval process. At this second annual audit, the following procedures and documents were assessed:

- DDS procedures
- ISO 9001 procedures
- material ordering system
- checking of the incoming material
- purchase policy of the company
- supplier declaration signed by new supplier
- purchase and sale invoices.

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 workers were interviewed in connection to general understanding of due diligence procedures, receiving, storing, production and final sale of wood.

Afterwards, a visit and detailed evaluation of two sampled suppliers was made. Suppliers were selected with short notice before arrival of the auditor with a Solid Parkiet representative. During supplier's audit the roundwood, source supply transport documents (forestry receipts) and invoices were checked.

After returning to main office of Solid Parkiet, the closing meeting was conducted where audit conclusions were provided verbally.



## 4. COMPANY DETAILS

### Contacts

Primary contact for Coordination with NEPCoN

Primary Contact, Position:	Anna Budyń – Świerczek - co-owner
Address:	ul. Wolicka 7, 32 – 830 Wojnicz, Polska
Tel/Fax/Email:	+48146787500/+48146787501/solidparkiet@solidparkiet.pl

### Billing Contact

Same as shown for “primary contact”

### Certificate Scope

Scope item	Check all that apply to the certificate scope		Change in scope (N/A for assessments)
<b>Certificate type:</b>	<input checked="" type="checkbox"/> Single site	<input type="checkbox"/> Group certification	<input type="checkbox"/>
<b>Activity:</b>	Primary: Secondary manufacturer	Additional: -	<input type="checkbox"/>
<b>Supplier scope</b>	<input type="checkbox"/> No supplier verification included in scope (only low risk sources)	<input checked="" type="checkbox"/> Supplier verification included in scope	<input type="checkbox"/>

**Please describe scope shortly:** The LegalSource certificate scope of Organisation covers the production of solid wood floor planks made of native broad-leaved species: *Quercus robur*, *Quercus petraea*, *Fraxinus excelsior*, *Betula pendula*, *Betula pubescens*, *Fagus sylvatica*, *Acer pseudoplatanus*, *Prunus avium* and two foreign species *Quercus rubra*, *Robinia pseudoacacia*, sourced locally however.

Solid Parkiet sources all of its wood material from southern regions of Poland (Podkarpackie, Małopolskie, Śląskie). Nearly all round wood sourced by sawmills (as suppliers to Solid Parkiet) derives from FSC-certified forests. The proportion of FSC sourced material entering these sawmills may vary between min. 97% - max 100%. The rest comes from one non-certified small private forest located in the same region of Poland.

Organization has implemented a Due Diligence System (DDS) and Chain of Custody (CoC) system despite all material coming from sawmills and FMUs located within the EU. These systems seek to avoid the 0-5% from supplier sawmills which derive from non FSC-certified FMUs. Solid Parkiet ensures that, for LegalSource production and claims, only applies to FSC 100% certified wood is used.

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.

## Organisation Scope

Number of sites included in this certificate: 1

Sites that qualify for desk audits: N/A

Type of legal entity (of certificate holder): Spółka cywilna (Private partnership company)

Jurisdiction of primary legal entity: Poland

Table 1: Site details

Site	Address Tel/Fax/Email	Type of operation	LegalSource product groups (include brief description)	Visited during this audit.
Solid Parkiet s.c.	ul. Wolicka 7, 32 – 830 Wojnicz, Poland +48146787500/+48146787501/solidparkiet@solidparkiet.pl	Secondary manufacturer Exporter	Floor Parquet 4409 29 91 Floor Lam-parquet 4409 29 91 Solid wood floor panels 4409 29 91 Lamela 4408 90 15 European oak ( <i>Quercus robur</i> , <i>Quercus petraea</i> ) European ash <i>Fraxinus excelsior</i> , Red oak <i>Quercus rubra</i> , <i>Robinia pseudoacacia</i> , <i>Betula pendula</i> <i>Betula pubescens</i> , <i>Fagus silvatica</i> , <i>Acer pseudoplatanus</i> , <i>Prunus avium</i>	Piotr Nowak 7 hours at 3 sites (Solid Parkiet and 2suppliers).

Table 2: LegalSource Scope

Site	Inputs to Product Groups	Product placed on the market
Solid Parkiet s.c.  ul. Wolicka 7, 32 – 830 Wojnicz, Polska	Square edged timber (friezes).  This material is considered to be FSC-certified supplied by non-certified suppliers. So according to FSC CoC requirements, it is not FSC certified input although the material is accompanied by forestry dispatch tickets with a full FSC claim on.  <i>Quercus robur</i> , <i>Quercus petraea</i> , <i>Fraxinus excelsior</i> , <i>Quercus rubra</i> , <i>Robinia pseudoacacia</i> , <i>Betula pendula</i> <i>Betula pubescens</i> , <i>Fagus silvatica</i> , <i>Acer pseudoplatanus</i> , <i>Prunus avium</i>	Floor Parquet 4409 29 91 Floor Lam-parquet 4409 29 91 Solid wood floor panels 4409 29 91 Lamela 4408 90 15 European oak ( <i>Quercus robur</i> , <i>Quercus petraea</i> ) European ash <i>Fraxinus excelsior</i> , Red oak <i>Quercus rubra</i> , <i>Robinia pseudoacacia</i> , <i>Betula pendula</i> <i>Betula pubescens</i> , <i>Fagus silvatica</i> , <i>Acer pseudoplatanus</i> , <i>Prunus avium</i>