Overview of PEFC Chain of Custody Certification

Where to find PEFC documents?

Visit PEFC website: https://pefc.org/standards-implementation/standards-and-guides

Visit Preferred by Nature website: https://preferredbynature.org/certification/pefc
Standards for Certificate Holders

• Chain of Custody, PEFC ST 2002
  • Requirements for chain of custody certification for forest and tree based products.
  • PEFC chain of custody establishes the link from the forest to the market, tracking forest and tree based products from sustainable sources to the final product.
  • In addition, this standard includes management requirements, including on health, safety and labour issues.

• PEFC Trademarks Rules, PEFC ST 2001
  • Requirements that entities must follow when using the PEFC trademarks, in order to ensure accurate, verifiable, relevant, and non-misleading use of the PEFC logo and related claims.

• List of PEFC Product Categories
Certification process

**Certificate process:**
- Certification granted for 5 years
- Certification process starts with **assessment**
- Surveillance audits shall be carried out **annually**
- CB to carry out at least 4 surveillance audits before the expiry date of the certificate.

*Annually means once every twelve months plus or minus three months*

- **Certification number composed by CB name abbreviation-PEFC-COC-number**, i.e: **PBN-PEFC-COC-123456**

- **Signing a trademarks licence contract mandatory** - usage of trademarks voluntarily
PEFC ST 2002:2020 Contents

Section 1-3: Scope and general information about the standard

Section 4: Management system requirements

Section 5: Identification of inputs and declaration of outputs

Section 6: Chain of custody methods

Section 7: Due Diligence System (DDS) requirements

Appendix 1: PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources

Appendix 2: Implementation of the chain of custody standard by multi-site organisations
Management system

- General requirements (4.1)
  - Establish and implement a management system
  - Define the scope by specifying the PEFC product groups
  - Only make correct FSC claims and statements
- Procedures (4.2)
  - The organisation shall establish written documented procedures for its PEFC chain of custody
    E.g. Responsibilities, material flow, product groups, methods for claims, sale, trademark use, records, internal audits, DDS, outsourcing
- Responsibilities (4.3)
  - Documented organisation commitment
  - ONE person or position overall responsible for compliance with ALL standard aspects
  - Define key personnel for each procedure
Record keeping (4.4)

- Maintain complete and up-to-date records of the documents that are relevant to demonstrate the organisation’s conformity with all applicable certification requirements.

- Retention time for all records shall be at least 5 years.

- At minimum records shall include: procedures, product group, training records; purchase and sales documents; material accounting records; trademark approvals; records of suppliers, complaints, and outsourcing; records related to a due diligence system; outsourcing; internal audits.
Management System

- **Resource management (4.5)**
  - Human resources/personnel
  - Technical facilities

- **Inspection and control (4.6)**
  - Annual internal audits
  - Management review

- **Complaints (4.7)**
  - Documented procedures to handle complaints

- **Nonconformity and corrective action (4.8)**
  - Handle internal and external non-conformities
  - Implement corrective actions
  - Keep records

- **Social and OHAS requirements (4.10)**
  - Management commitment to comply with the social, health and safety requirements defined in this standard
  - Freedom of association
    - Forced labour
    - Child labour
    - Discrimination
    - Occupational health and safety
Outsourcing (4.9)

- Written agreement
- Certificate Holder’s full responsibility
- Part of the internal audit
PEFC Chain of Custody management system:

<table>
<thead>
<tr>
<th>Identification of inputs</th>
<th>DDS (when applicable)</th>
<th>Implementation of CoC method</th>
<th>Declaration of outputs</th>
</tr>
</thead>
</table>
| Identification of material (products, quantity) and delivery | Material excluded:  
  - recycled material,  
  - material from species listed in Appendix I to III of CITES  
Special treatment:  
  - Material under a PEFC recognized claim | Physical separation  
Percentage (rolling percentage)  
Credit method | Specifying doc where making claims  
Include identification information  
Potential CoC claims:  
  - X% PEFC certified  
  - PEFC Controlled Sources  
  - 100% PEFC Origin  
Trademarks usage (if allowed) |
| Identification at supplier level | Classification of material according to material categories |  |  |
Product group (3.30)

Product or set of products with **equivalent input material**, defined by:

<table>
<thead>
<tr>
<th>Product groups</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Product name/type and category</td>
<td>Outdoor furniture</td>
</tr>
<tr>
<td>Type(s) of species</td>
<td>Oak</td>
</tr>
<tr>
<td>Chain of custody method</td>
<td>Physical separation</td>
</tr>
<tr>
<td>Material category</td>
<td>PEFC certified, neutral material</td>
</tr>
<tr>
<td>PEFC claim(s)</td>
<td>100% PEFC certified, 100% PEFC Origin</td>
</tr>
</tbody>
</table>

**Equivalent input material (3.11):** material that can be substituted with each other without significantly changing the appearance, function, grade, type or value of the output product.
Management of the product group

The organization shall:

- Define the **scope** of its CoC certification by **specifying** the PEFC **product groups**
- Include product groups in the organization’s **documented procedures**

**Keep records** relating to product groups of:

a) all suppliers of PEFC claimed input material
b) input material
c) calculation of the certified content, **transfer of the percentage to output products and management of the credit account**, as applicable
d) products sold/transfered
e) Due Diligence System
f) internal audits, periodic review, non-conformities, corrective actions
g) complaints and their resolution
Identification of input

- Supplier identification
  - In case material must be with PEFC claim
  - Check validity of CoC certification (scope, status...) on PEFC website
- Product identification
- Quantity of products
- Delivery identification based on date of delivery, delivery period, or accounting period
Identification of input material (5.1)

For all inputs delivered with a PEFC claim the organisation shall verify that the supplier is covered by a PEFC recognised certificate on the PEFC website:

https://pefc.org/find-certified
Identification of inputs - CoC claims on input material

PEFC claim (3.27)

PEFC official claim

- X% PEFC certified
- 100% PEFC Origin
- PEFC controlled sources

Accepted abbreviation

- X% PEFC

Examples of wrong PEFC claim usage: PEFC Recycled, PEFC Mix, PEFC x%, PEFC Pure, PEFC Credit, PEFC CS
## Accepted translations of the PEFC CoC claims

<table>
<thead>
<tr>
<th>Official PEFC claim (English)</th>
<th>X% PEFC certified</th>
<th>PEFC controlled sources</th>
<th>100% PEFC Origin</th>
</tr>
</thead>
<tbody>
<tr>
<td>Czech (Česky)</td>
<td>X% certifikováno PEFC</td>
<td>PEFC Kontrolované zdroje</td>
<td>100% pôvodu PEFC</td>
</tr>
<tr>
<td>Danish (Dansk)</td>
<td>X% PEFC-certificeret</td>
<td>PEFC godkendte kilder</td>
<td>100% PEFC oprindelse</td>
</tr>
<tr>
<td>Dutch (Nederlands)</td>
<td>X% PEFC-gecertifieerd</td>
<td>PEFC gecontroleerde bronnen</td>
<td>100% uit PEFC-bossen</td>
</tr>
<tr>
<td>Estonian (Eesti keel)</td>
<td>X% PEFC-sertifitseeritud</td>
<td>PEFC-kontrollitud allikad</td>
<td>100% PEFC-päritolu</td>
</tr>
<tr>
<td>Finnish (Suomen kieli)</td>
<td>X% PEFC-sertifioitu</td>
<td>PEFC-kontrolloitu alkuperä</td>
<td>100% PEFC-sertifioituista metsistä</td>
</tr>
<tr>
<td>French (Français)</td>
<td>Certifié PEFC X %</td>
<td>PEFC Sources contrôlées</td>
<td>Origine PEFC 100%</td>
</tr>
<tr>
<td>German (Deutsch)</td>
<td>X% PEFC-zertifiziert</td>
<td>PEFC Kontrollierte Quellen</td>
<td>100% aus PEFC-Wäldern</td>
</tr>
<tr>
<td>Italian (Italiano)</td>
<td>X% certificato PEFC</td>
<td>Fonti controllate PEFC</td>
<td>100% Origine PEFC</td>
</tr>
<tr>
<td>Japanese (日本語)</td>
<td>X% PEFC 認証</td>
<td>PEFC 管理材</td>
<td>100% PEFC由来</td>
</tr>
<tr>
<td>Latvian (Latviešu valoda)</td>
<td>X% PEFC sertifikāts</td>
<td>PEFC izsekojami avoti</td>
<td>100% PEFC izcelsmes</td>
</tr>
<tr>
<td>Malaysian (Bahasa Malaysia)</td>
<td>X% dipersijil PEFC</td>
<td>Sumber terkawal PEFC</td>
<td>100% asal PEFC</td>
</tr>
<tr>
<td>Norwegian (Norsk bokmål)</td>
<td>X% PEFC sertifisert</td>
<td>PEFC kontrollerte kilder</td>
<td>100% PEFC opprinnelse</td>
</tr>
<tr>
<td>Portuguese (Português)</td>
<td>X% Certificado PEFC</td>
<td>Fontes Controladas PEFC</td>
<td>100% de Origem PEFC</td>
</tr>
<tr>
<td>Slovak (Slovenčina)</td>
<td>X% PEFC certifikované</td>
<td>PEFC kontrolované zdroje</td>
<td>100% PEFC pôvod</td>
</tr>
<tr>
<td>Spanish (Español) Argentina, Chile, Uruguay</td>
<td>X% Certificado PEFC</td>
<td>Fuentes Controladas PEFC</td>
<td>100% Origen PEFC</td>
</tr>
<tr>
<td>Spanish (Español) Spain</td>
<td>X% PEFC Certificado</td>
<td>PEFC Fuentes Controladas</td>
<td>100% PEFC Origen</td>
</tr>
<tr>
<td>Swedish (Svenska)</td>
<td>X% PEFC-certifierad</td>
<td>PEFC Kontrollerade källor</td>
<td>100% PEFC-ursprung</td>
</tr>
</tbody>
</table>

**Translated PEFC claims can be used:**

- When selling to companies based on the same country or companies based in countries where the same language is spoken;
- And using the claims as per PEFC ST 2002 when selling to companies based in countries where the same language is not spoken

**In any case, companies can use the official claims in English**
Identification of input material – product identification (5.1.1.b)

Forest and tree-based material

- PEFC claimed material
  - X% PEFC certified → PEFC certified material
  - 100% PEFC Origin → PEFC certified material
  - PEFC Controlled Sources → PEFC controlled sources
  - Endorsed SFM ST claim from forest owner → PEFC certified material
  - Recycled material → PEFC certified material
  - Non-PEFC claimed material → Other material

Non-forest and tree-based material → Neutral material
Declaration of outputs and sales (5.2)

- Specify the document where declaration of outputs are made

- Include the following info:
  - PEFC customer identification
  - the organisation’s name as the supplier of the material
  - product identification
  - quantity of product(s)
  - date of delivery / delivery period / accounting period
  - the applicable PEFC claim specifically for each claimed product covered by the documentation
  - certificate number (PBN-PEFC-COC-#####)

- 3 potential CoC claims (X% PEFC certified, 100% PEFC Origin, PEFC Controlled Sources)
Chain of Custody methods

Three separate CoC methods

- Physical separation
- Percentage method
- Credit method

Rolling percentage
Physical separation method (6.3)

Ensure separation at all stages of processing

Previous suppliers can have used other methods

Means of separation:
- separate storage,
- marking, distinguishing product characteristics or production time.
Physical separation method (6.2)

- Material with different **certified content** may be used as input in the same **PEFC product group**. **Input lowest certified content = certified content of the output**.

- **PEFC certified material** and **PEFC controlled sources** material may be combined in the same **PEFC product group**. **Output claim is “PEFC controlled sources”**.

Inputs
5t 100% PEFC Certified
5t PEFC Controlled Sources

Output
10t PEFC Controlled Sources
Percentage method (6.3)

Certified content of a PEFC product group is calculated for a specified claim period.

Based on the input material included in the PEFC product group.
Percentage method (6.3)

• Used to **calculate** the **certified content of PEFC products groups** for which PEFC certified and PEFC controlled sources material were used as input material.

• Calculation of certified content (6.3.2)

\[
\text{Certified content (Cc)} = \frac{\text{Volume of PEFC certified material (Vc)}}{\text{Volume of PEFC certified material (Vc)} + \text{Volume of FC controlled sources material (Vcm)}} \times 100
\]

• **Neutral material** is not considered in the calculation of the **certified content**.

• The **certified content** is calculated based on a single measurement unit used for all material covered by the calculation.

• \( V_c \) = quantity of **certified content** of the input material. The rest of the input material will be considered **PEFC controlled sources** material.

• The **certified content calculated** for a **PEFC product group** shall be used as **percentage** in the **PEFC claim** “\( X \% \) PEFC certified”.

Example:

• **Inputs:** 1t “75% PEFC certified” + 1t “100% PEFC certified”

• Certified content (Cc) = \[
\frac{(750 + 1000)}{((750+1000)+250))} \times 100
\]

• Certified content (Cc) = \[
\frac{1750}{2000} \times 100 = 87,5\%
\]

• **Claim** (2 t): “87,5% PEFC certified”

• On-product label allowed
Percentage method (6.3)

- **Example:** Printer producing a PEFC certified magazine

- **Group product:** magazine, with mix of non-PEFC certified paper (cover) and 100% PEFC certified paper (pages), percentage method, input material categories: PEFC certified and PEFC controlled sources

- **Input material:**
  - Cover: Paper non-PEFC certified (30 grams) - so PEFC Controlled sources (after going through DDS)
  - Pages: Paper 100% PEFC certified (300 grams)

- **Certified content:** 300/(300+30) * 100 = 90,9% PEFC certified

- **On-product label allowed**
Percentage method vs physical separation

• Same example for physical separation: Printer producing a book

• Group product: magazine, with mix of non-PEFC certified paper (cover) and 100% PEFC certified paper (pages), physical separation method, input material categories: PEFC controlled sources and PEFC certified

• Input material:
  - Cover: Paper non-PEFC certified (30 grames) – so PEFC Controlled sources (after going through DDS)
  - Pages: Paper 100% PEFC certified (300 grames)

• No calculation of Cc, lowest Cc is used

• CoC claim: PEFC controlled sources

• On-product label NOT allowed
Percentage method: Rolling percentage (6.3.4)

- Percentage method may be applied as rolling percentage.
- **Calculation of certified content:**
  - **Input period**
    Time period over which the **certified content** is calculated, **max 12 months**
  - **Claim period (3.4)**
    Time period for which the certified content of a product group is determined, **max 3 months**

**Example:** An organisation that has chosen a 3-month claim period and a 12-month input period calculates the certified content for the coming three months based on the input material procured in the previous 12 months.
Credit method (6.4)

Credit account for each PEFC product group

- multiple product groups → multiple credit accounts
- different sites can use the same credit account

Total quantity of credits accumulated shall not exceed the sum of credits entered into the credit account during the last 24 months

May be expanded if average production period is longer
Cross-site percentage and credit calculations

Centralised percentage or credit calculation

- Per PEFC product group
- Not limited geographically
- No requirements for contributions by the sites
- No physical possession requirement
Two ways for calculating credits:

1. **Certified content** and volume of output products of the relevant claim period
   
   \[
   \text{Credits (single unit)} = \text{Output volume} \times \text{certified content}
   \]

2. Certified input and input/output ratio (**verifiable***)
   
   \[
   \text{Credits (single unit)} = \text{Certified input} \times \text{input/output ratio}
   \]

• Can spend credits „partially“*

*The organisation can use 7 units of credits to sell 7 units as 100% PEFC certified, or to sell 10 units as 70% PEFC certified.
Rolling percentage method vs credit method

- Applicable Cc to the output period:
  - same Cc for all the output products produced during the claim period
  - Cc up to the company, according to the available credits in the account

- Max input period
  - 12 months for percentage system
  - 24 months of accumulated credits for credit system method

- Max output product
  - 3 months for percentage system
  - Nothing for credit system
• Mechanism for the avoidance of material from controversial sources
• Risk-based approach
• Delivering credibility and transparency

Structure of the DDS:
1. Chapter 7, requirements 7.1.2 a and b of the main body of the standard: relevant for all organisations ONLY using PEFC claimed material*
*(requirement 7.1.2 c is relevant for all organisations)
2. Appendix 1 (normative): relevant for organisations using NOT PEFC claimed material
Scope of DDS

• For all material used in PEFC product groups

• Except for:
  • **recycled material** (which comply with PEFC’s definition of recycled material, requirement 3.15)
  • raw material originating from species listed in Appendix I to III of CITES shall comply with applicable legislation relating to CITES

• Implementing DDS:
  • gathering information
  • risk assessment
  • management of significant risk supplies
In case of PEFC claimed material following steps should be followed:

1. On request, the organisation shall provide the relevant information as per Step 1 of DDS: Access to information (Appendix 1, clause 2)

2. If there are substantiated concerns, these need to be followed according to step 3 of DDS (Appendix 1, clause 4)

3. Commitment and procedure to not put material on the market which is NOT covered by the CoC system but knowingly from controversial sources. If substantiated concerns, step 4 of DDS (Appendix 1, clause 4)
Incoming delivery

- Recycled material
- xx% PEFC Certified
- PEFC Controlled Sources
- No claim

Information gathering

- Species and origin

Risk assessment

- Stakeholder concerns?
  - None
  - Concerns

  - Pre-assessment (Table 1 indicators)
    - No indicators apply
    - Risk assessment (table 2 and 3 indicators)
      - Negligible risk
      - Significant risk

  - Management of significant risk supplies
    - Control measures effective
    - Control measures not effective

PEFC Certified product (x% PEFC Certified or PEFC Controlled Sources)

Due Diligence System
No placement on the market (Appendix 1, p 6.1 -6.3)

- Forest and tree-based material/products from unknown sources or from controversial sources shall not be included in a PEFC product group.
- Where it is known that forest and tree-based materials/products originate from illegal sources -> shall not be placed on the market.
- Substantiated concerns that forest and tree-based materials/products originate in illegal sources -> it shall not be placed on the market until the concern has been resolved.
Types of certifications

- **Individual certification**
  - all of the activities relating to the organisation’s chain of custody are carried out at the **same site**

- **Multi-site certification**
  - Activities are carried out on **more than one site**
  - **Central office** for planning, control, management
  - **Sites** where activities are carried out
    "a **central office at which activities are planned, controlled and managed and a network of sites at which activities are carried out**"
Types of Multi-site Organisations (2.3)

• Multi-site organisations may cover:
  a) Organisation with franchises or companies where sites are linked through:
     • Common ownership
     • Common management
     • Other organisational link (not membership in association)

b) Producer Group: group of independent legal enterprises
   (established for the purpose of Chain of Custody certification)

**Group members requirements:**

• Are located in the same, single, country
• Have maximum 50 employees (full time employees equivalent)
• Have maximum of **10,000,000 €** OVERALL turnover
Internal audit programme (3.2.2)

• Prior to the Certification Body evaluation:
  
  • Audit of all the sites and central office, on site or remotely, where a remote verification is feasible.
  • Audit of any new site (according to previous requirement, either on-site or remotely)
Adding sites to an existing certificate

1. Client organisation informs Certification Body in advance, including number of sites to add (limited to 100% of n. existing sites)

2. Provides Certification Body with:
   - CoC procedures covering additional sites, CoC method and products
   - Internal audit report for the site(s) considered

3. Certification Body reviews internal audit and determines if additional information needed
PEFC Trademark use

- PEFC logo and labels, chain of custody claims on-product and PEFC initials
- PEFC ST 2001, PEFC Trademarks Rules – Requirements

In order to enable the organisation to use the PEFC trademarks in accordance with the PEFC Trademarks Rules, the organisation shall obtain a valid trademark license from the PEFC Council or another PEFC authorised body.

- The licence can cover several sites when they are part of a single legal entity
<table>
<thead>
<tr>
<th>Sections 1-3: Scope, Normative References, Terms &amp; Definitions,</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 4: Ownership of PEFC Trademarks</td>
</tr>
<tr>
<td>Section 5: Scope of the PEFC Trademarks</td>
</tr>
<tr>
<td>Section 6: PEFC Trademarks Usage Requirements</td>
</tr>
<tr>
<td>Section 7: PEFC Trademarks Technical Requirements</td>
</tr>
<tr>
<td>Section 8: Graphic Requirements of the PEFC Labels</td>
</tr>
<tr>
<td>Appendix 1: Alternative Promotional Label Messages</td>
</tr>
<tr>
<td>Appendix 2: Examples of Wrong PEFC Label Usages</td>
</tr>
</tbody>
</table>
Two registered trademarks of PEFC that belong to the PEFC Council

• PEFC initials

• PEFC Logo

The PEFC logo and the PEFC initials shall not be accompanied by any symbols to indicate that they are registered trademarks, such as the™ or the “R”

To be used, Organizations shall hold a PEFC trademarks license agreement
Label Generator

- PEFC Label Generator mandatory
  - When organisations get certified against the 2020 version of the CoC ST
PEFC Trademarks Scope – Chapter 5

• On Product
  a) Direct on tangible product
  b) Indirect on media or marketing materials
  c) Direct or indirect material used in production process

• Off Product
  • any usage not covered by on product
### Table 1: Overview of the usage

<table>
<thead>
<tr>
<th>PEFC trademarks user</th>
<th>On-product usage</th>
<th>Off-product usage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Group A: National Governing Bodies</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Group B: Sustainable forest management (SFM) certified entities</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Group C: Chain of custody certified entities</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Group D: Other users</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Note 1:** Group B certificate holders that also hold a [PEFC chain of custody](https://www.pefc.org) certificate and therefore belong also to Group C, can use the PEFC trademarks on-product.

**Note 2:** Additional off-product messages to be used, for instance, as forest signs, are suggested in Appendix A to be used by trademarks user Group B.

**Note 3:** For [retailers](https://www.pefc.org) under trademarks user Group D, see also requirement 6.3.4.4.
Technical Requirements – Chapter 7 – On product

• The product the trademarks refer to shall be clear
  • label message or name of product if clarification needed

• To determine percentage of certified material, the complete product shall be considered

• On product usage - 2 labels

PEFC Certified
Minimum 70% certified content

PEFC Recycled
Maximum 99.9% recycled material content
Usage on non-commercial products allowed if:

- clear; and
- label message included

Same requirements for the initials

Alternative promotional label messages are listed in Appendix 1 of PEFC ST
Graphic Requirements – Chapter 8

Elements

1. PEFC logo
2. PEFC licence number
   • Is meant to identity the trademarks user
3. Label name
4. Label message
5. Website
   • The trademark shall not be used with the R or TM symbols
Graphic Requirements

Orientation, Dimensions & Minimum Size

Landscape

Portait

The ratio and proportions of the PEFC label shall not be modified
Graphic Requirements

Placement

The minimum amount of surrounding clear space in order to ensure the label is uncluttered and easily recognisable.
## Graphic Requirements

### Optional Elements

<table>
<thead>
<tr>
<th></th>
<th>PEFC certified label</th>
<th>PEFC recycled label</th>
<th>PEFC off-product label</th>
</tr>
</thead>
<tbody>
<tr>
<td>PEFC logo</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Label name</td>
<td>Yes</td>
<td>No</td>
<td>N/A</td>
</tr>
<tr>
<td>Label message</td>
<td>Yes *</td>
<td>Yes *</td>
<td>Yes *</td>
</tr>
<tr>
<td>PEFC website</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Frame</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>
Examples of incorrect label use

- Do not change the font of the label elements.
- Do not change the proportions of the label elements in any way.
- Do not stretch or compress the PEFC labels in any way.
- Do not change the colour of any of the elements of the PEFC label.
- Do not use the PEFC labels with other messages, claims or labels that can be misunderstood or misleading with regard to PEFC.
- Respect the minimum amount of clear space (the equivalent to the height of the letter “F” in the logo) between the PEFC label and other labels and elements around the PEFC label.
- Respect distance between the elements of the PEFC label.
- Do not move or remove elements that are not allowed to be removed.
- Do not use promotional label on product.
- Do not use blurred PEFC labels.
- Do not use the PEFC logo with the “TM”.