CONTROL PROCESS

NATURAL ORIGIN AND ORGANIC CANDLES AND HOME FRAGRANCES

The aim of the present document is to describe the key steps of the control process. This document is part of your control contract.
The standard in force is available at http://www.ecocert.com/en/natural-origin-and-organic-candles-and-home-fragrances or is forwarded upon request.
Changes to this document are identified by a vertical line in the margin.

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Preamble

Ecocert Greenlife is a subsidiary of Ecocert group that was founded in 2008. It is dedicated to the control and the certification of non-food products (cosmetics, detergents, home fragrances, textiles, etc.).

You have applied for control according to natural origin and organic candles and home fragrances Scheme. Thanks to this document, Ecocert will present you the different steps for the control of your products according to the scheme requirements.

Control, made by an independent body, allows you to attest your conformity with control requirements.

Control process is a voluntary process. Each company is responsible for meeting these requirements. This document does not replace the regulation in force and we remind you that control granted by Ecocert is not a certification of compliance with the regulations.

SUMMARY

I. Definitions

Terms used in this document are defined in Annex I.

II. Applicable scheme

The scheme Natural origin and Organic Candles and Home fragrances is managed by Ecocert Greenlife. It is a private scheme.
Ecocert Greenlife offers service in France and abroad through its subsidiaries.

Documents of the scheme are the following:
- The Natural origin and Organic Candles and Home fragrances standard,
- The present control process,
- The rules of reference to the control
- The Terms and conditions or Technical conditions

All these documents are available free on the website *http://www.ecocert.com/en/natural-origin-and-organic-candles-and-home-fragrances* or on request.

III. Access to the control

A. Scope of our service: In which case should I apply for control?

Beneficiaries	Obligation to commit	No obligation to commit
Distributor/ Brand owner	You are a brand owner or the person in charge of the release to market	You are just a distributor: You sell other brands products and you are not in charge of the release to market
Manufacturer/ Subcontractor (of raw materials or finished products)	You are in charge of the release to market of the products you manufacture And/or You have one brand owner or more who is committed with Ecocert	
Handler	You have two brand owners or more who are committed with Ecocert.	You have only one brand owner who is committed with Ecocert However, the evaluation of this activity must be realized.
Complex and particular cases (industrial groups, superstores and supermarkets…)	We invite you to contact ECOCERT to obtain information on commitment obligations.	

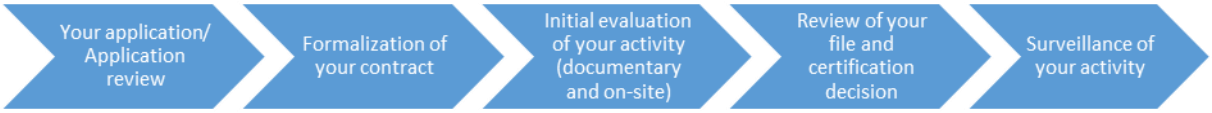
B. Restrictions

Ecocert may refuse an application for control when there are fundamental or known reasons such as illegal activities or repeated non-conformities of control requirements, inappropriate behavior, outstanding payment, etc.

IV. The control process step by step

The service is based on an annual cycle. It leads, when the control requirements are fulfilled, to the issuance or renewal of a certificate of compliance, allowing you to market your products with a reference to the control and/or to Ecocert Greenlife.

The steps of the control process are the following (and are detailed below):



A. Your control application

1. Composition of your control application file

All the information necessary to complete the certification process is detailed in the following documents (available on request):

- The current version of the standard
- This control process (This document)

We also ask you to complete the precise information about your project via a commitment form.

Upon receipt of the completed form, we will examine your request, which allows us to:

- Make sure you have read all the requirements of the standard
- Ensure that all necessary information are specified in the forms
- Study the feasibility of your request.

2. Application which cannot be satisfied by Ecocert

Control is not possible in these specific cases:

- established non-conformity with the general regulations in force on candles/home fragrances
- a conflict of interest that could undermine the impartiality of our decisions
- a geographical location that makes control technically impossible or risky for those involved,
- the lack of qualified personnel to meet the specific requirements of your request
- a termination of contract following a sanction by Ecocert less than 3 years

B. Formalization of your contract

1. Production of your quotation

Ecocert, on the basis of your application, will establish a personal quote for the current year and taking your specific activity into account (manufacturer, subcontractor, brand owner, handler, other) and based on an estimate of the required working time. This quote details the documentary evaluation, on site audits, and finally audit report review and decision of control. Audit, sampling or analysis, which are not planned in the evaluation plan are not included in the initial quotation.

The quotation is sent to you together with the Terms and conditions or the Technical conditions and fee schedule within 15 days. Additional time may be required for complex cases.

2. What documents are included in your contract with Ecocert?

The contract of control is composed of the current versions of the following documents:

- The Terms and Conditions or Technical conditions
- This control process
- The Natural origin and Organic Candles and Home fragrances standard
- The rules of reference to control
- The application form
- The quotation

3. Formalizing your commitment

Your contract is concluded upon return of the signed quotation.

By signing this quotation, you agree to the Terms and conditions or Technical conditions including the compliance to the requirements defined in the standard.

C. Initial evaluation

During the initial evaluation, all the activities in scope of the control will be checked in order to ensure your compliance to the standard's requirements.

1. Documentary evaluation and preparation of your on-site audit

Your file will be allocated to a certification officer, who will be your first point of contact. This officer will precise you the forms needed to prepare for your approval audit that are specific to your activity.
These documents are reviewed by your certification officer and used to refine our knowledge of your activity and collect all necessary information for your on-site audit.

Ingredients, formulas, labels, packaging and cleaning products have to be sent for validation before any use.

The approval audit is assigned after once your application has been processed.

The auditor in charge of your audit plans with you an audit appointment. About 10 days before your audit, the auditor sends to you an audit plan and reminds you to keep documents available by sending a notification of visit.

Audit plan and these documents are defined in accordance to ECOCERT procedure, according to your position in the process of development, manufacturing and distribution of the products, and others involved in process.
In order to prepare your audit, you can consult the Guide for the Preparation of the audit.

2. On-site audit

On-site audits are performed in order to check the compliance of the products with the requirements of the standard and are conducted on all sites carrying out operations on products covered by the control: manufacturing, packaging, etc.

Ecocert conducts audits on the basis defined inspection plan, specific to your activity (see G.2).

The audit is carried out according to the following steps:

- The opening meeting: the auditor presents the objectives and the different points to check, confirms the scope and the audit plan,
- The documentation evaluation,
- The on-site visit and interview with employees,
- The closing meeting: the auditor makes a summary of the on-site audit.

In the event of analysis, any sampling is done in the presence of you or of your representative, who signs the related documents. The nature of the analysis and the laboratory chosen to do the analysis are determined by Ecocert.

If it is necessary, Ecocert may decide to leave a sample in your facility. This sample should be used only in the event of counter-analysis. In this case, you, a representative of Ecocert or a bailiff may send the sample to a third party laboratory appointed by Ecocert according to the Ecocert instructions. Billing terms are defined inclusively in your annual quotation, or otherwise, to real costs.

3. Summary of your audit

During the audit, non-conformities with standards requirements can be found. These non-conformities require actions (called "corrective actions") from you in order to get in compliance.

You receive at the end of the audit, the details of any non-conformity and, then, information regarding the additional evaluation tasks needed to verify that non-conformities have been corrected.

4. Evaluation of implemented corrective actions

At this point, if you express interest in continuing the control process, you must submit corrective actions for each non-conformity in the given time. These proposed actions must be relevant and comprehensive in order to continue the control process. Otherwise we will ask you to suggest new actions.

Depending on additional evaluation tasks needed to verify that non-conformities have been cleared, Ecocert may be required to proceed with:

- A new on-site audit
- Further sampling and analysis,
- Additional documentary evaluation

D. Non-conformities and correction plan

1. "Minor" non-conformities

A minor non-conformity is a non-conformity which does not alter the characteristics of the product to be controlled. It means that it does not alter the conformity of a product towards the principles of the standard and its most important requirements (see Foreword III.A of the standard) and is not misleading for consumers.

2. "Major" non-conformities

A major non-conformity is a non-conformity which alters or may later alter the characteristics of the product to be controlled. It means that it alters the conformity of a product towards the principles of the standard and its most important requirements and/or can be considered as misleading for consumers.

3. Correction plan

The correction plans lists potential non-conformities and classifies them according to their degrees of severity ("major" or "minor" non-conformity). It also identifies, for each non-

conformity the consequence on the control. Appropriate actions to be taken and application modalities are also detailed. The consequence on the control is defined

according to the nature and the severity of the non-conformity as well as its occurrence and the risk of fraud.

Appropriate measures may be (see § G.4 for details):
- Continuation of control under conditions
- Reduction of the scope of control
- Suspension of the control
- Withdrawal of the control

E. Review of the evaluation results and control decision

The audit report and your proposed corrective actions are forwarded to your certification officer, who will ensure the relevance of the report sent. You will then receive the control decision with the analysis results (if applicable) which is based on the correction plan defined by Ecocert, the audit report and other related documents.

Non-conformities are resolved on the basis of evidence gathered (in documents or on-site observation, when applicable) and adherence to the correction plan.

If the control decision is positive, your certification officer will send you your control documents.
If the control decision is negative, your certification officer will inform you by mail and identifies the reasons. In this case, you can apply for a new control process by going back to step A.

If there are suspicions that you are marketing, or are planning to market, products that do not comply with the standard but which make reference to control, Ecocert may demand the provisional suspension of control for the said products. Before taking such a control decision, you will be informed and asked to present your own observations.

F. Control documents

Control documents shall only be issued after, or concurrent with, the following:
- The decision to grant the control has been made,
- Control requirements have been fulfilled.

These control documents (certificate of compliance, subcontracting attestation, handling attestation) conveys or permits identification of the following:
- The name and address of Ecocert Greenlife
- The control granting date
- Your name and address
- The term of control
- The list of your controlled products (Natural origin or Organic Candles and Home fragrances) / your controlled processes

Costs that would be incurred (eg: manufacturing, printing labels…) in anticipation of a control decision not yet issued are under your responsibility and cannot be supported by Ecocert.

Only the holder of the control document can make reference to the control on its products.

G. Surveillance and continuation of the control process

1. Periodic surveillance

The control process is automatically renewed every year, if you did not notify Ecocert about the termination of your contract under conditions on current Terms and Conditions or Technical Conditions.

On the basis of any information you will send to us and/or we may collect during audit and other investigation, Ecocert will update your annual control fee.

During the surveillance period, we implement the audit plan which consists of:

- On-site audit(s) surveillance
  Exceptionally, remote audits can also be carried out.
- Documentary checking, if modifications are implemented on documents that were checked during initial evaluation, or in case of new products to be controlled
- Annual analysis plan (when applicable)

2. Audit plan on site

All entities involved in the control process (manufacturing, labelling, packing, selling) are audited once per year whatever is their geographical location.

Complementary audits can be added, especially to solve major non-conformities.

In the case where the time limit for an audit is not respected, Ecocert reserves the right to suspend your certificates of compliance, this even if the expiration date of such certificates of compliance is beyond the deadline to make the concerned audit.

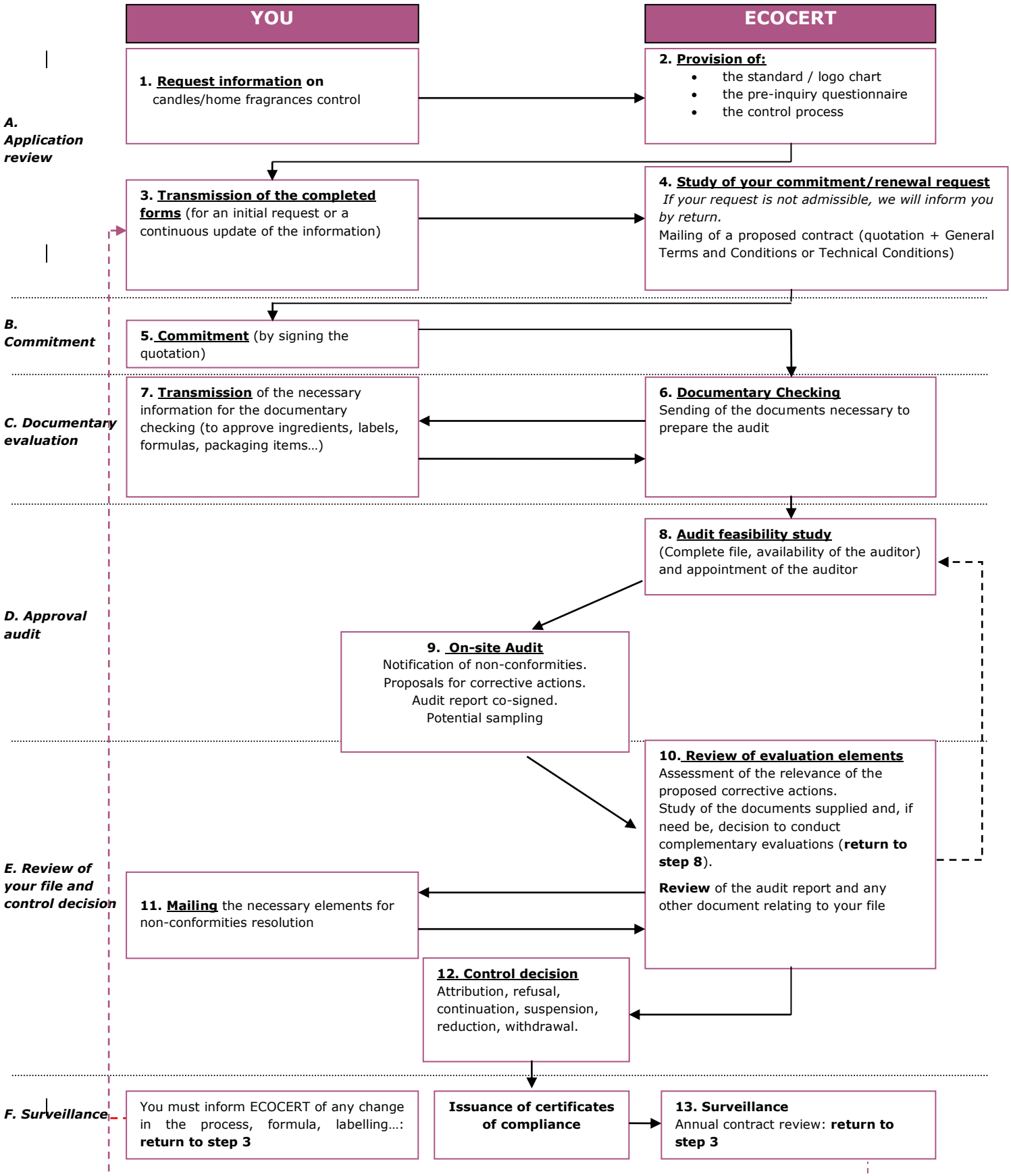
3. Surveillance evaluations

The corrective actions defined to deal with previous non-conformities will be checked.

Surveillance is also based on the verification of any changes in control requirements or the scope of your control. For this reason, you must inform Ecocert without any delay about any change in your system (manufacturing, process, and quality) or the range of your products to be controlled.

During surveillance, steps C, E and F below are repeated.

4. Summary table of the control process steps



H. Control renewal

If no non-conformity is identified during surveillance, the control decision is granted and your certification officer will issue your new control document.

If a non-conformity arises as a result of the surveillance or by any other means, it will be reviewed by Ecocert and appropriate measures will be taken.
Based on the correction plan and regarding the extent and severity of identified non-conformities, Ecocert can take the following appropriate measures:

(i) Continuation of control under conditions
Conditions to continue control may be for instance:

- Increased surveillance through new audit or additional analysis
- A delay to allow you to implement corrective actions
- Etc.

If required conditions are not fulfilled in the given time, Ecocert will start the process of suspension or withdrawal of control and update the control documents accordingly.

(ii) Suspension control or control on hold.
This involves the interruption of control for a specific period or until compliance of the product. If the product is not controlled yet, your certificate of compliance will be on hold. Suspension may involve one or more product(s) and/or batch. To clear such non-conformity you must provide the necessary elements within the time granted.

In all cases, reference to the Natural origin and Organic Candles and Home fragrances control can no longer be made for the products concerned by the suspension until the non-conformity is solved. The concerned product(s) will be removed of your control document during the suspension period.

(iii) Reduction of the control scope
This implies the immediate and final cancellation of the control for part of the products and/or batch. The products are downgraded in the conventional circuit and can no longer make reference to the control. This decision may be due to non-conformity noticed during on-site audit or on your request if you do not wish to use the control for one or more of your products (cancellation).

In all cases products are removed from the certificate of compliance without notice.

(iv) Withdrawal of control
This implies the immediate cancellation of the control for all your products. You can no longer make reference to the control for any of your products.

This decision is also accompanied by the termination of the contract with Ecocert.

A product without certificate of compliance or whose certificate of compliance has been suspended/withdrawn cannot display any reference to the control. This ban also applies to any other communication materials.
The suspension or withdrawal of your conformity documents implies the immediate end of validity of these documents. It is your responsibility to inform your clients that your products are not controlled anymore and to stop using your control documents.

I. Changes affecting control

1. Changes in the control scheme (new or revised requirements)

Ecocert undertakes to inform you by e-mail about changes to documents in the Natural origin and Organic Candles and Home fragrances scheme, modalities of implementation and to make available the most up to date version of this scheme on the ECOCERT website.

In some cases, the amended provisions will apply with immediate effect whereas in others, transitional measures may be implemented by Ecocert.

It is your responsibility to implement changes and that of Ecocert to check their implementation.

If changes are not implemented, Ecocert can notify you of a non-conformity which, if not resolved, can lead to a reduction, suspension or even a withdrawal of your control (see §G.4).

2. Changes of your control scope

It is also your responsibility to inform Ecocert, without delay, of any changes that might affect your compliance to the control requirements.
Examples of such changes can include the following:

- Legal, commercial, organizational status or ownership,
- Organization and management,
- Modifications to the product or the production method,
- Contact address and production sites,
- Etc.

The changes may have an impact on your control (changes of the scope of the certificate of compliance, suspension, withdrawal…) and potentially lead to an additional audit (in case of new products/processes).

3. Postponement of your control

Should you plan to suspend your activity (halt manufacture, packaging or sale of the Ecocert controlled products), we offer you the possibility to suspend our service for 1 and up to 2 semesters, with our contract remaining in force during this time. Ecocert must be notified as soon as possible of this suspension.

Your control documents are no longer valid during this period. You are therefore no longer allowed to manufacture or sell products with a reference to the control nor to Ecocert Greenlife, regardless of the communication support (labelling, website, communication documents, etc.).
At the end of this on-hold period, the control process is resumed at step 1 – application review, followed by an initial approval audit as for any initial application.

J. End of control

1. End of contract term and consequences on your control

You can ask to stop control for all or a part of your products at any time. In case you would like to cease the control of all your products and stop at the same time your contract, you must do so in compliance with the conditions defined under Terms and Conditions or the Technical Conditions.

The end of control for all or a part of your products, and the termination of your contract if any, implies the end of validity of your certificates of compliance for the concerned products with immediate effect.

Consequently, after the termination date of the control (and the termination of the contract as the case might be), you can no longer manufacture and market the concerned products making reference to control and/or to Ecocert Greenlife. Control of products already distributed and still on the market is not questioned.

2. Specific cases of stock selling off and stock audit

However, if you had stocks of compliant products making reference to the control or to Ecocert requiring a run-down period going beyond your certificate of compliance expiry date, you are asked to inform us about the estimated time to sell such stock.

Ecocert will examine your request and may extend your contract and allow you to sell your stock of compliant products. In that case an annual audit as a "distributor" might be required and will implies additional cost.

The contract and certificate of compliance will therefore remain in force until the date we have agreed for you to be able to sell the stocks of controlled products, by yourself or the site of initial sale (an annual stock audit is required), it being stipulated that if you are a distributor, stocks and compliant products transferred after the initial sale (between warehousing and shops for example) within the agreed timeframe, can be sold off, provided they are compliant, with no time limit.

In any case, we recommend you to contact Ecocert to find out the exact termination terms and conditions applying to your organisation.

During such contract extension period, you are not allowed to manufacture new products making reference to the control and/or to Ecocert Greenlife.

V. Complaints and appeals

You may be asked to submit to Ecocert complaints about our services, or to appeal a control decision taken by Ecocert.

Ecocert commits first to acknowledge receipt of your complaints and appeals and then to deal with them in a timely manner and according to our internal procedures.

A. Complaints

Anyone can send a complaint to Ecocert. Complaints can concern documentary validation, other clients, Ecocert service…
An acknowledgement of receipt will always be sent to the complainant within 8 days. Then, an answer will be sent after approval from a person who is not involved in the complaint.

All complaints are recorded by the quality manager, as well as measures taken and an analysis is made on a regular basis to improve our service.

B. Appeals

You may appeal any control decision by sending a notice to Ecocert.

To be eligible, your appeal must:
- Be a written notice (letter or email),
- Be done within 15 days following the receipt of the control decision,
- Be duly justified: new items that have not yet been brought to the attention of Ecocert must be provided.

If the appeal is admissible, it is processed by Ecocert.

Appeals are not suspensive of the decision subject to the appeal. These decisions therefore apply until a new decision has been made after evaluation of your appeal.

C. Your obligations with respect to third parts claims

You are responsible for managing third parts claims that are addressed to you directly. You must keep a record of all complaints related to compliance with control requirements and make these records available to Ecocert. These records must keep track of the appropriate actions taken and these actions must be documented.

VI. Use of references to control, to Ecocert and use of trademarks (Ecocert and others) associated to the service provided

Conditions of references to control, to Ecocert/Ecocert Greenlife and associated trademarks are defined in the following document: TS006(GPA) - Rules of use for Ecocert logo and reference to the compliance with the standard.

Misuse of the trademark or incorrect reference to control or to Ecocert by a client may lead to the implementation of appropriate measures such as reduction, suspension or withdrawal of control. Ecocert is also required to inform competent authorities.

Here are some of the cases that may arise:
- The logo seal or the reference to control or to Ecocert is made on products which are not compliant to control requirements,
- The logo seal or the reference to control or to Ecocert is made on products which have not been the subject of an application for control or in the process of control,
- In general, the rules of reference to control are not fulfilled (please read these rules, document are available on our website or on request).

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Ecocert wishes you a good control and remains at your disposal if you have any question:

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Customer relationship service: ☎ +33 (0)5 62 07 51 09 or by email: ecoproduits@ecocert.com

Annex I: Definitions

Appeal: Written request by a client to the Ecocert group reconsideration of a control/attestation decision the group has made.

Control: Issuance of a control document (see definition).

Control document: control document issued to the client attesting the conformity of products to the scheme.

Control requirement: Specified requirement that is fulfilled by the client as a condition of establishing or maintaining control.

Control scheme: Set of requirements, rules and procedures defined by the scheme owner that must be implemented by the Ecocert Group.

Control Standard: Technical document defining products requirements to be met, evaluation methods and procedures for communication on control.

Client: Person or organization that has subscribed to a service from the Ecocert Group through the signature of a service agreement.

Complaint: Expression of dissatisfaction, other than appeals, by any person or organization to the Ecocert Group relating to the activity of the Group where a response is expected.

Correction plan: List of non-conformities related to control requirements and their impact on the control decision. It can be completed by any additional evaluation needed to clear non-conformities.

Corrective action: Action to clear the cause of non-conformity or other undesirable situation noticed.

Evaluation plan: Description of the number and the evaluation types needed on an evaluation cycle to grant product conformity to products requirements based on the type of clients.

Handler: Third party Company that is under contract with the client and that packages, stocks ingredients supplied by the limited partner (i.e. the committed operator) and invoices for labour and/or stocking. Within the framework of these products, a handler does not purchase any ingredients, and does not sell finished products to the final consumer. S/he invoices for the provision of services.

Non-conformity: Non-fulfilment of a requirement.

Surveillance: Repetition of the assessment, review, control decision, according to the control scheme, as the basis of control maintenance.