



4C System Update 13

27 May 2022

Clarification on type and level of infringements of the Certification Body and related sanctions

The 4C Certification Body Regulations, version 4.0 has been in effect since 1st July 2020. This system update therefore clarifies the classification of the infringements of the Certification Body (CB), related applicable **sanctions** and **consequences of the service to be provided by the related CBs** for a robust and credible system operation.

Table on the classification of infringements of the CB

Types of infringements	Level of infringements related to the certification process	Level of infringements related to the requirements for CBs and/or integrity program	Sanctions
Procedure failure: failure to meet deadlines or requirements of certification procedure (validation, due date, deadline, etc.)	Moderate	Moderate	Warning letter and 1,000.00 EUR/case in case of missing deadline ¹
Documentation failure: incorrect, incomplete, and inconsistent documents (wrong version, incorrect filling, missing data, etc.)	Moderate	Moderate	Warning letter
Management of appointed staff: Failure to meet 4C requirement on managing, approving, and replacing assigned staff to work on 4C related business	Moderate	Moderate	Warning letter
No proper correction to the moderate infringement(s) OR Non-response to a warning letter before the deadline ²	Severe	Severe	Yellow card
Failure to meet requirements on risk assessment and sampling (failure to apply the risk assessment, non-compliance of minimum sample size, missing at least one BP type in the	Severe	Severe	Yellow card and up to 10,000.00 EUR/case ³

¹ According to the Terms of Use for Certification Bodies, article 7.3

² Any moderate infringement notified through warning letter that is not cleared or no response from CB after 2nd warning letter.

³ According to the Terms of Use for Certification Bodies, article 7.2





Types of infringements	Level of infringements related to the certification process	Level of infringements related to the requirements for CBs and/or integrity program	Sanctions
sample, not analyzing potential additional risk indicators). Also valid for additional and specific requirements of Add-On certifications, when applicable			
Wrong certification decision or AU approval decision	Severe	Severe	Yellow card and up to 10,000.00 EUR/case
Not granting access to the integrity auditor(s) during the integrity assessment	Not applicable	Critical	Red card
Accreditation body or competent national public authority has suspended the accreditation or permission of the CB	Not applicable	Critical	Red card
No proper correction to any severe infringements OR Non-response to a yellow card sanction notification applied ⁴	Not applicable	Critical	Red card
Verified intentional fraud (identified and verified during integrity audits or inspected by government agencies, etc.)	Critical	Critical	Contract cancelation and up to 10,000.00 EUR/case
No proper correction to any critical infringements OR Non-response to a red card sanction notification applied ⁵	Critical	Critical	Contract cancelation

Sanctions in case a yellow card or a red card is issued

Related sanctions when the yellow card is issued and not lifted yet:

- the yellow card will be shown next to the name of the CB published on the 4C website
- CB can complete the pending steps of the ongoing 4C certification process, as contracted by users
- CB cannot register for a new 4C audit nor for an Annual Update evaluation
- the respective responsible auditor(s) may be immediately suspended from any audits or Annual Update evaluation of the related CB and of all other CB(s) that the auditor(s) is/are currently working/contracted with, in the 4C System

⁴ Any severe infringements notified through warning letter that is not cleared or no response from CB after 2nd notification on the application of the sanction together with the yellow card

⁵ Any critical infringements notified through warning letter that is not cleared or no response from CB after the 2nd notification on the application of the sanction together with the red card





Related sanctions when the red card is issued and not lifted yet:

- the red card will be shown next to the name of the CB published on the 4C website
- CB cannot register for a new 4C audit nor for an Annual Update evaluation
- CB cannot issue (or reissue) a 4C certificate
- the respective responsible auditor(s) may be immediately suspended from any audits or Annual Update evaluation of the related CB and of all other CB(s) that the auditor(s) is/are currently working/contracted with, in the 4C System

Status of the sanction(s) applied to a CB is updated on actual basis and published on the 4C website.

Important note: As stated in the chapter 5.4, the following requirement remains valid: “4C evaluates the type and level of infringements and defines the type and level of sanctions, based on a case-by-case examination”.

