



## GLOBAL FORESTRY SERVICES

Registered Office: 2446 N. San Gabriel Blvd., Suite #C, Rosemead, CA 91770, USA.  
Malaysia: C/O Whitespace Bangsar, No.3.02D (East Wing), Level 3, Menara BRDB,  
285, Jalan Maarof, 59000 Kuala Lumpur, Malaysia.  
Tel: +6012 310 6007 Fax: +603 2724 3207  
Email: [gfs@gfsinc.biz](mailto:gfs@gfsinc.biz) Website: [www.gfsinc.biz](http://www.gfsinc.biz)

## WOOD TRACKING PROGRAM

# Requirements Chain of Custody

**Global Forestry Services Wood Tracking Program (GFS WTP)** provides assessment and monitoring of manufacturers and traders under a formal **Chain of Custody (CoC)** system to document Low Risk of raw material and wood-based products against legal compliance that can be traced back through the supply chain. The objective of the GFS Wood Tracking Program is to mitigate illegal raw materials from entering the supply chain by establishing an entire Chain of Custody system consisting of formalized procedures for all key activities. Participating companies need to conduct a Risk Assessment for purchasing raw materials and products from each Supplier to ensure all material and wood products used in the GFS WTP are Low Risk. The Chain of Custody system must include purchasing, receiving, material handling, production, finished goods, warehousing and sales of **Verified Legal (VL)** material and products as applicable to the company's activities.

The Wood Tracking Program is coupled with Legal Verification Services to provide an on-site assessment of forest and plantation management for legal compliance for suppliers that fall under medium and high-risk.

All manufacturing and trading companies that desire to trade timber products under a **GFS Wood Tracking Program** will be subject to the requirements and conditions of participation (defined in documents GFS-WI-006-WTP.3 & GFS-WI-006-WTP.4, respectively). A GFS Wood Tracking Program – Statement of Compliance for manufacturing and trading companies will be valid for 5 years and subject to surveillance every 12 months or as deemed necessary to verify continual compliance.

***"The GFS Wood Tracking Program provides the due diligence needed to verify that raw material and wood-based products are documented as Low Risk from Verified Legal & deforestation free sources."***

Wood processing companies and distributors of timber products shall be able to demonstrate compliance with the requirements listed in this document for Verification under the **GFS Wood Tracking Program**. The company needs to demonstrate a formal chain of custody system that complies with the current GFS Wood Tracking Program requirements (GFS-WI-006-WTP.3) system for the identification and traceability of Low Risk raw material through the processing and trade of **Verified Legal** wood products. Compliance with the GFS-WI-006-WTP.3 is defined where companies have been assessed to comply with all applicable Principles and Criteria as defined in the Wood Tracking Program (GFS-PRO-006-WTP).

### Objectives:

- The objective of these requirements is to ensure companies participating in the **GFS Wood Tracking Program** implement a formal Chain of Custody (CoC) system to provide traceability of wood products to forest or plantation areas that have been Verified Legal to meet International Due Diligence Requirements.
- The requirements for EUDR to exclude material from deforestation areas are included within this standard.
- All raw materials and wood products must be evaluated as Low Risk in accordance with the formal Risk Assessment (GFS-WI-006-WTP.2).
- A Statement of Compliance is issued to a company that demonstrates compliance with the current GFS Wood Tracking Program requirements (GFS-WI-006-WTP.3). Companies must maintain the CoC system and will be evaluated at a minimum annually or as deemed necessary to maintain the system.

Document Control			
GFS-WI-006-WTP.3	Title: Requirements Chain of Custody	Issue: 15	Date: 30 Dec 2022

Intellectual property of **Global Forestry Services (USA) Inc. - GFS**



## GLOBAL FORESTRY SERVICES

Registered Office: 2446 N. San Gabriel Blvd., Suite #C, Rosemead, CA 91770, USA.  
 Malaysia: C/O Whitespace Bangsar, No.3.02D (East Wing), Level 3, Menara BRDB,  
 285, Jalan Maarof, 59000 Kuala Lumpur, Malaysia.  
 Tel: +6012 310 6007 Fax: +603 2724 3207  
 Email: [gfs@gfsinc.biz](mailto:gfs@gfsinc.biz) Website: [www.gfsinc.biz](http://www.gfsinc.biz)

## WOOD TRACKING PROGRAM

### Risk Assessment:

Raw materials and products purchased must be formally evaluated under a Risk Assessment (GFS-WI-006-WTP.2) based on a documented review of Country risk, Material risk and Operational risk. Only Low-Risk materials and products can be used within the GFS WTP as part of a formal Chain of Custody System. The Risk Assessment recognizes 3rd party verification or certification as due diligence for defining low risk of forests, manufacturing and trade of timber and wood products directly associated with Operational Risk.

All material and products identified and traded as Verified Legal (VL) within the WTP must be assessed as Low Risk either through the Risk Assessment or directly through an on-site assessment by GFS or other 3<sup>rd</sup> party organizations. Companies exporting material or products to the EU also need to evaluate that VL material does not include material from areas under deforestation with respect to EUDR requirements (**VL Non-Deforested**). The GFS Legal Verification Service is used to directly evaluate and report legal compliance for forest and plantation areas to local and national regulations that do not meet the criteria for Low Risk based on the documented Risk Assessment guidelines.

### Definitions:

Certified	Material that has been purchased or sold as certified in accordance with the FSC or PEFC systems.
Environmental status	Verified Legal, VL Non-Deforested, Certified or Unclassified.
Low Risk	Material that has been evaluated as Low Risk in accordance with the GFS Risk Assessment or similar evaluation of risk.
Unclassified	Material that has not be evaluated as Low Risk.
Verified Legal (VL)	Material that is documented as Low Risk from illegal activities based on a Risk Assessment that includes Country Risk, Material Risk, Operational Risk or that has been Verified Legal by an independent third party against a defined legality standard.
VL Non-Deforested	Verified Legal material that is not a result of deforestation as per EUDR definitions.

## Wood Tracking Program - Chain of Custody Requirements

### 1.0 Legal Requirements

The organization shall be legally registered and have adequate knowledge and demonstrate compliance with relevant regulations for its activities and operations.

1.1 The organization shall demonstrate that it has obtained all licenses, permits required for its activities.

1.1.1) The organization shall be legally registered and maintain permits for operations.

1.1.2) Records of licenses and permits shall be maintained up to date.

1.2 The organisation shall demonstrate compliance with relevant governmental regulatory requirements with respect to health and safety, based on their operations.

1.2.1) The organization shall have access to current relevant governmental regulatory requirements pertaining to its activities.

1.2.2) The organisation shall demonstrate compliance with safety & health regulations.

1.2.3) The organization shall have adequate safety and protective equipment to support their job functions, prevent accidents and fire.

1.2.4) The organization shall ensure operations to not negatively affect the health of workers, staff or local communities.

### Document Control

GFS-WI-006-WTP.3	Title: Requirements Chain of Custody	Issue: 15	Date: 30 Dec 2022
------------------	--------------------------------------	-----------	-------------------

Intellectual property of **Global Forestry Services (USA) Inc. - GFS**



## GLOBAL FORESTRY SERVICES

Registered Office: 2446 N. San Gabriel Blvd., Suite #C, Rosemead, CA 91770, USA.  
 Malaysia: C/O Whitespace Bangsar, No.3.02D (East Wing), Level 3, Menara BRDB,  
 285, Jalan Maarof, 59000 Kuala Lumpur, Malaysia.  
 Tel: +6012 310 6007 Fax: +603 2724 3207  
 Email: [gfs@gfsinc.biz](mailto:gfs@gfsinc.biz) Website: [www.gfsinc.biz](http://www.gfsinc.biz)

## WOOD TRACKING PROGRAM

1.2.5) The company shall maintain records of accidents and take actions to prevent accidents from reoccurring.

1.3 The organisation shall demonstrate compliance with all relevant governmental regulatory requirements in regard to labour & environment.

1.3.1) The organisation shall demonstrate compliance with labour regulations and contractual obligations (agreements) with workers.

1.3.2) The organisation shall demonstrate payments for worker compensation as required.

1.3.3) The organisation shall demonstrate compliance with environmental regulations.

1.4 The organisation shall demonstrate payments of fees charged by government for conducting its activities are current.

1.4.1) The organisation shall demonstrate required payments such as licensing and permit fees are paid.

### 2.0 Documented Policy & Procedures

The organization shall have a policy that includes legal compliance, environmental protection, social benefits and formal procedures on purchasing, production control and sales as appropriate to comply with the policy.

2.1 The Organization shall have a policy that makes reference to compliance with regulations, environmental issues such as CITIES and support for sustainable forest management through responsible purchasing of raw material and products.

2.1.1) The Organization shall have a policy referencing compliance with legal & GFS requirements:

- Compliance with legal requirements for the company's activities.
- The traceability of forest products within the supply chain to a verified legal source.
- Non-use of CITIES species unless there is a valid CITIES certificate.
- Support of Sustainable Resource Management, environmental protection and social benefits.
- Identification and segregation of material from areas under deforestation for EU markets.

2.1.2) The Company policy statement is publicly available.

2.2 The organisation shall have a formal documented manual that describes the COC System and identifies all points critical to control the production / trading system along with associated records / documents where there is a significant risk of materials from different categories of environmental status (**Verified Legal, VL Non-Deforested, Certified, Unclassified**) becoming mixed.

2.2.1) Documented procedures for Chain of Custody include all key activities associated with manufacturing and trading as applicable.

2.2.2) Documented procedures adequately define the COC system based on the activities of the organization.

2.2.3) Procedures include subcontracted activities, as applicable.

2.3 The organisation shall include (as appropriate) purchasing, receiving, storage, identification, material allocation, processing, assembly, packaging, warehousing, sales & export within its COC program.

2.3.1) The company has established procedures that adequately define all key activities as applicable:

- Administration and control of Chain of Custody system.
- Purchasing, Risk Assessment (supplier & material including deforestation for the EU market).
- Receiving, Storage & Issuing into production.
- Planning & Production Control.
- Finished Goods, Warehousing.
- Sales & Export.

Document Control			
GFS-WI-006-WTP.3	Title: Requirements Chain of Custody	Issue: 15	Date: 30 Dec 2022



## GLOBAL FORESTRY SERVICES

Registered Office: 2446 N. San Gabriel Blvd., Suite #C, Rosemead, CA 91770, USA.  
 Malaysia: C/O Whitespace Bangsar, No.3.02D (East Wing), Level 3, Menara BRDB,  
 285, Jalan Maarof, 59000 Kuala Lumpur, Malaysia.  
 Tel: +6012 310 6007 Fax: +603 2724 3207  
 Email: [gfs@gfsinc.biz](mailto:gfs@gfsinc.biz) Website: [www.gfsinc.biz](http://www.gfsinc.biz)

## WOOD TRACKING PROGRAM

2.4 The organisation has a formal agreement with subcontractor organizations to ensure all activities are conducted in accordance with the company's COC procedures.

- 2.4.1) Agreement with subcontracting company, requiring compliance with the company's procedures.
- 2.4.2) Subcontracted services are adequately defined in respect to procedures and activities to identify and segregate materials provided to conduct the service.
- 2.4.3) Subcontracted services are monitored and comply with procedures.

2.5 The organisation shall provide a system to maintain compliance with GFS WTP requirements, to address complaints and issues arising in implementing the Chain of Custody systems.

- 2.5.1) The company shall internally evaluate its implementation of the CoC system and address gaps identified during external and internal assessments.
- 2.5.2) Formal complaints shall be recorded along with actions taken to address the complaint.
- 2.5.3) Procedures exist for identification of non-conforming materials / products that shall not be identified or sold as GFS WTP / VL materials or products.

### 3.0 Organisation & Training

The organization shall maintain an appropriate management structure and provide training of staff to control activities and comply with company procedures and policies.

3.1 The assessed organisation shall ensure that there is a management representative, clear organisation structure and responsibility for implementing and maintaining the COC program.

- 3.1.1) Roles and responsibilities are defined for key staff for implementing the COC system.
- 3.1.2) The organization chart references the name and position of management representative and key positions within the Chain of Custody system.

3.2 Training is conducted and records are maintained on safety, health, fire and COC system as appropriate to activities.

- 3.2.1) Training on Chain of Custody System is conducted for all staff and subcontractors as applicable.
- 3.2.2) The organisation shall ensure training on safety, health, fire prevention and suppression is conducted for all workers in relation to their job function.
- 3.2.3) Records of training shall be maintained that include training date, trainer, topics and attendance.

3.3 All staff understands their specific responsibilities in relation to maintaining the COC system.

- 3.3.1) Key staff have adequate knowledge on the COC system and procedures.
- 3.3.2) Key staff have adequate knowledge on safety and health.

### 4.0 Purchasing, Importing & Receiving

The organization shall have a formalized system for purchasing, receiving and recording of raw materials and products from approved suppliers that are **Verified Legal (VL)** based on a Risk Assessment and/or through 3<sup>rd</sup> party verification to define low risk materials and products.

4.1 The Organization shall conduct a supplier Risk Assessment to ensure that materials and products from each supplier can be approved and documented as low risk with respect to purchasing Verified Legal materials or wood products.

- 4.1.1) The organization must conduct a Risk Assessment of each supplier to evaluate risk of supplying raw materials or products that may be considered high risk for legality. Risk Assessment should include Country risk based on origin of material, Material / Species Risk and Operational Risks.
- 4.1.2) The risk assessment shall be approved for use by GFS (GFS-WI-006-WTP.2) or other 3<sup>rd</sup> party verification system as applicable.

Document Control			
GFS-WI-006-WTP.3	Title: Requirements Chain of Custody	Issue: 15	Date: 30 Dec 2022



## GLOBAL FORESTRY SERVICES

Registered Office: 2446 N. San Gabriel Blvd., Suite #C, Rosemead, CA 91770, USA.  
 Malaysia: C/O Whitespace Bangsar, No.3.02D (East Wing), Level 3, Menara BRDB,  
 285, Jalan Maarof, 59000 Kuala Lumpur, Malaysia.  
 Tel: +6012 310 6007 Fax: +603 2724 3207  
 Email: [gfs@gfsinc.biz](mailto:gfs@gfsinc.biz) Website: [www.gfsinc.biz](http://www.gfsinc.biz)

## WOOD TRACKING PROGRAM

4.1.3) The organization approves suppliers based on evaluation of low risk of raw materials or products.

4.1.4) The organization shall identify material from forest areas under conversion to agricultural land use in relation to manufacture and trading of products for EU markets in compliance with EUDR.

4.1.5) The organization maintains records of purchasing of VL raw material or products from approved suppliers that have been assessed as Low Risk to meet demands for production and sales to EU and other markets.

4.2 Purchasing contracts and associated documents shall contain adequate information clearly describing the environmental status and quantities of the material purchased along with identification to trace the material back to origin.

4.2.1) The Organization issues Purchase Order / Purchase Contract to approved suppliers for materials or timber products documented as Low Risk.

4.2.2) Transport documents (Transport permits, timber disposal permits, removal passes, etc.) are available to confirm materials or products purchased and received is traceable to an approved supplier.

4.2.3) Records of purchases and receipt of VL materials and products shall be maintained and summarized monthly.

4.3 Purchases of raw materials and products that are not verified as low risk must not be used in the production or sale of Verified Legal (VL) products under the GFS WTP.

4.3.1) All Verified Legal raw materials and products received shall be clearly identified and separated from non-VL materials and products.

4.3.2) Verified Legal raw materials and products received for areas under deforestation shall be clearly identified and separated from other materials and products as required for production for sale to the EU market.

4.3.3) Suppliers and materials that are not documented as Low Risk following evaluation **must not** be used in manufacturing or trade of Verified Legal products under the GFS WTP.

4.4 Importing of verified legal raw materials and products shall be in compliance with import regulations.

4.4.1) The Organisation shall have a valid import license from government agencies as required.

4.4.2) The Organisation shall demonstrate the import documents & fees payable correspond to the material imported that shall include as appropriate:

- Purchase Contract
- Customs Declaration Forms
- Inspection report & fees payable to government agency (as applicable)
- Phytosanitary inspections (if applicable)
- Invoice & Packing lists / detailed description of goods
- Bill of Lading
- Transport Permits / delivery notes (as applicable) from port to factory

4.5 The organisation shall provide for adequate documentation, physical identification / segregation of raw materials or goods received in relation to purchase contract and environmental status (Verified Legal, VL Non-Deforested, Certified, Unclassified).

4.5.1) There is clear physical identification of raw materials or products received in relation to purchase contract and environmental status.

Document Control			
GFS-WI-006-WTP.3	Title: Requirements Chain of Custody	Issue: 15	Date: 30 Dec 2022



## GLOBAL FORESTRY SERVICES

Registered Office: 2446 N. San Gabriel Blvd., Suite #C, Rosemead, CA 91770, USA.  
 Malaysia: C/O Whitespace Bangsar, No.3.02D (East Wing), Level 3, Menara BRDB,  
 285, Jalan Maarof, 59000 Kuala Lumpur, Malaysia.  
 Tel: +6012 310 6007 Fax: +603 2724 3207  
 Email: [gfs@gfsinc.biz](mailto:gfs@gfsinc.biz) Website: [www.gfsinc.biz](http://www.gfsinc.biz)

## WOOD TRACKING PROGRAM

4.5.2) Stock of material on site match records of VL raw materials or products received & stored in the log yard or warehouse.

4.5.3) Records of raw materials or products purchased and received by month are available and correct.

### 5.0 Process Controls for Manufacturing

The organization shall maintain a clear system for planning, identification, control and recording of verified legal raw material allocated to production through finished goods with respect to the requirements of buyers and markets.

5.1 Manufacturing companies shall have procedures and planning to ensure raw materials are correctly issued into a defined production unit (batch #/work order-WO #) that clearly defines the units for production, environmental status (Verified Legal, VL Non-Deforested, Certified or Unclassified) along with the production period (*maximum 1 calendar month*).

5.1.1.) The Company demonstrates adequate production planning and procedures that define unique production units (Work Order, batch, etc.).

5.1.2) The Company has system to allocate the correct raw material based on environmental status and quantity into the production unit (Work Order, batch, etc.).

5.1.3) The Company adequately implements planning and production controls to identify & segregate production of Verified Legal, VL Non-Deforested from Unclassified or Certified production units with respect to the buyer requirements.

5.2 Manufacturing companies shall maintain adequate documentation of raw material used in each production unit to enable traceability and calculation of recovery based on volume of raw material input and volume of products produced.

5.2.1) The company has adequate records of raw material stock and issuing of material into each planned and defined production unit (Work Order, batch, etc.).

5.2.2) The Company maintains records of input volume of raw material and output volume of products for production units (Work Orders, batches) for calculation of recovery.

5.2.3) Summary records of raw material allocated to production and products produced for each production unit are maintained by month.

5.3 Manufacturing companies should be able to demonstrate the COC System with use of Low Risk (Verified Legal or Certified) raw material. If material used to demonstrate the COC system is not under one of the aforementioned environmental categories, then the company must notify GFS to conduct an initial surveillance when acceptable material is available.

5.3.1) The Company adequately demonstrates the COC system using Low Risk (Verified Legal or certified) raw material in production according to a pre-defined production unit (work order, batch).

5.4 All work in progress, components and finished goods shall be clearly identifiable to its environmental status and appropriate production unit (work order #, batch #, etc.) to maintain traceability from raw material through finished products, warehousing and sales.

5.4.1 Work in progress is consistently identified to a specific unit of production (Work Order #, batch #) and environmental status.

5.4.2) Stock material on the production floor, rework material, etc., are clearly identified to environmental status and production unit or purchase order # as appropriate.

5.4.3) Finished goods are consistently identified to a specific unit of production (Work Order #, batch #) and environmental status.

Document Control			
GFS-WI-006-WTP.3	Title: Requirements Chain of Custody	Issue: 15	Date: 30 Dec 2022

Intellectual property of **Global Forestry Services (USA) Inc. - GFS**



## GLOBAL FORESTRY SERVICES

Registered Office: 2446 N. San Gabriel Blvd., Suite #C, Rosemead, CA 91770, USA.  
 Malaysia: C/O Whitespace Bangsar, No.3.02D (East Wing), Level 3, Menara BRDB,  
 285, Jalan Maarof, 59000 Kuala Lumpur, Malaysia.  
 Tel: +6012 310 6007 Fax: +603 2724 3207  
 Email: [gfs@gfsinc.biz](mailto:gfs@gfsinc.biz) Website: [www.gfsinc.biz](http://www.gfsinc.biz)

## WOOD TRACKING PROGRAM

5.5 The company shall maintain detailed production records of finished goods that should be entered into warehouse records and allocated to a sales order referencing both environmental status and production unit #.

5.5.1) The company should maintain records of finished goods by production unit, quantity and volume that is allocated to a finished goods warehouse.

5.5.2) Warehouse records should have clear reference for allocation of finished goods to sales that enables traceability between production units (Work Order #, batch #) and specific sales orders and current stock levels.

### 6.0 Sales, Exports & Customs

The organization shall maintain a clear system for identification, control of verified legal products manufactured and/or purchased for sale and export to buyers that comply with legal regulations.

6.1 The organisation shall have & implement procedures to ensure that all products sold under a sales order are clearly identifiable according to its **Verified Legal** status, species and traceable to the production unit and/or purchase order as appropriate.

6.1.1) Sales procedures clearly define the products and species used, to be sold according to **Verified Legal / deforestation status (if applicable)** and traceable to the production unit for manufacturing companies or to the purchase contract/ order for trading companies.

6.2 Sales invoices and other documentation related to sales of product identified using the GFS WTP statement shall include the registered GFS Wood Tracking Statement of Compliance #. The organization should also identify all material and finished goods exported using a product declaration form (GFS Form-006-WTP.6)

6.2.1) Sales invoices and packing lists reference the GFS WTP # for verified legal materials / products sold under the Wood Tracking Program.

6.2.2) Sales invoices and packing lists for EU market shall reference the VL Non-Deforested status of products sold under the Wood Tracking Program.

6.2.3) Organization should use an approved product declaration form for all exported material and products that defines species, quantity & verified legal status & traceability to production units as appropriate.

6.3 The company shall comply with export regulations and ensure payments of exports fees and taxes are current.

6.3.1) The company shall possess a valid Export License / Permit (as applicable).

6.3.2) The company shall ensure that each consignment for export has been approved and inspected by government agencies as required.

6.3.3) The company shall ensure inspections and fees are paid and as required and transport permits are issued if applicable.

6.3.4) The organisation shall ensure that each export consignment is cleared by customs and consists of the required documentation.

6.4 The organisation shall maintain sales records that can be summarized to verify the quantity of Verified Legal material and finished goods sold.

6.4.1) Sales records clearly identify verified legal products sold that can be traced to defined production units for mills and / or purchase orders for trading companies.

6.4.2) Quantity of Verified Legal products sold to various buyers are clearly recorded.

6.5 Sales, marketing claims and documentation for products sold under the GFS Wood Tracking Program shall be in compliance with the Conditions of Participation (GFS-WI-006-WTP.4).

6.5.1) Sales, marketing claims, website information identify the company's GFS WTP Statement #.

Document Control			
GFS-WI-006-WTP.3	Title: Requirements Chain of Custody	Issue: 15	Date: 30 Dec 2022

	<b>GLOBAL FORESTRY SERVICES</b>		
	Registered Office: 2446 N. San Gabriel Blvd., Suite #C, Rosemead, CA 91770, USA. Malaysia: C/O Whitespace Bangsar, No.3.02D (East Wing), Level 3, Menara BRDB, 285, Jalan Maarof, 59000 Kuala Lumpur, Malaysia. Tel: +6012 310 6007 Fax: +603 2724 3207 Email: <a href="mailto:gfs@gfsinc.biz">gfs@gfsinc.biz</a> Website: <a href="http://www.gfsinc.biz">www.gfsinc.biz</a>		
	<b>WOOD TRACKING PROGRAM</b>		

6.5.2) Claims are factual and not misleading.

6.5.3) Use of GFS WTP Logo for products must be in accordance with the requirements as defined in document (GFS-FORM-006-WTP.6).

**7.0 Summary Records & Data**

The organization shall maintain a clear system for documenting and maintaining records of Verified Legal material purchased, issued into production, finished goods manufactured and products for sale to buyers.

7.1 The organisation shall maintain records that can be summarised for all VL material/products received, issued into each work order and finished goods produced and sold as appropriate.

7.1.1) Verified Legal raw materials or products purchased are summarized monthly along with outstanding balances.

7.1.2) Records of VL finished goods produced under defined production units are summarized monthly that can be related to warehouse of finished products stock or sales.

7.1.3) Sales records for Verified Legal products are summarized monthly.

7.2 Retention times for records relevant to the COC system shall be defined based on their use but shall be at least 5 years.

7.2.1) The organization shall have procedures and system to maintain key records for 5 years or more.

<b>Document Control</b>			
GFS-WI-006-WTP.3	Title: Requirements Chain of Custody	Issue: 15	Date: 30 Dec 2022