

Butterfly Mark Certification Complaints and appeals procedure

PL-BM-CMP-001



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Scheme owner: Positive Luxury Ltd.

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Subordinate to PL-BM-SCH-001 – Butterfly Mark Certification Scheme Document

Document reference: PL-BM-CMP-001

Document control

This document is subordinate to PL-BM-SCH-001, the Butterfly Mark Certification Scheme Document. It sets out the procedure for receiving, investigating and deciding complaints and appeals, and is the detailed reference invoked by Clause 8.13 of the Scheme Document.

It is binding on Positive Luxury Ltd. as scheme owner and on each authorised certification body. In the event of inconsistency, the Scheme Document prevails.

Document identification

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Version history

Version and date	Summary of changes
1.0 2026-09-09	First issue.

Distribution and access

This document is publicly accessible on the Positive Luxury website. The controlled version is the version published on that website. Printed or locally stored copies are uncontrolled; users shall verify that they are referring to the current published version.

1. Purpose and scope

This procedure explains how any person or organisation may raise a complaint about the Butterfly Mark certification scheme and how an applicant or certified organisation may appeal a decision relating to certification. It covers certification-body activities, certified organisations in connection with their certification, and the scheme itself.

The procedure is structured to align with ISO/IEC 17065:2012 Clause 7.13 and shall be applied with the Scheme Document. It does not replace the assessment requirements in PL-BM-CRT-001 or the rules on the Butterfly Mark and Digital Butterfly Passport in PL-BM-MRK-001.

“Shall” indicates a binding requirement, “should” indicates a recommendation, and “may” indicates permission.

1.1 Terms and definitions

The terms defined in the Scheme Document apply. For this procedure:

Complaint	An expression of dissatisfaction by any person or organisation about the certification activities of an authorised certification body, the activities of a certified organisation in connection with its certification, or the scheme itself. A request to reconsider a certification decision is handled as an appeal.
Appeal	A request by an applicant or certified organisation for the certification body, or the scheme owner, to reconsider a decision relating to certification, subject to the allocation of authority in Clause 2.
Subject body	The certification body or scheme owner responsible for handling the matter under Clause 2.
Business day	Monday to Friday, excluding public holidays in the jurisdiction of the subject body.

1.2 Relevant documents

PL-BM-SCH-001 — Butterfly Mark Certification Scheme Document, particularly Clauses 5.3, 6.2, 8.10 to 8.14 and 9.1.

PL-BM-CRT-001 — Butterfly Mark Certification Scheme Audit Criteria.

PL-BM-MRK-001 — Mark and digital passport use policy, particularly Clause 14.

ISO/IEC 17065:2012 — Conformity assessment requirements for bodies certifying products, processes and services, particularly Clause 7.13.

2. Responsibility and contact routes

2.1 Certification-body activities and decisions

Complaints or appeals concerning a certification body's activities or decisions shall first be addressed to that certification body, using its published complaints and appeals contact details. For an applicant, this is the body handling the application; for a certified organisation, it is the body that issued the certification.

The certification body shall apply its documented complaints and appeals procedure and this procedure. It remains responsible for its decisions at all levels of its handling process and retains authority over certification decisions under Scheme Document Clause 8.6.

2.2 Certified organisations and the scheme owner

Complaints concerning a certified organisation, including consumer complaints connected with its certification, may be addressed either to the relevant certification body or to Positive Luxury at complaints@positiveluxury.com. The scheme owner shall forward the matter to the relevant certification body where appropriate while retaining oversight.

Complaints about the scheme itself or the scheme owner's own activities and decisions shall be addressed to complaints@positiveluxury.com. This is also the contact for onward escalation under Clause 4.

2.3 Suspected misuse of the Mark or Passport

Any person may report suspected misuse of the Butterfly Mark or Digital Butterfly Passport to complaints@positiveluxury.com under PL-BM-MRK-001 Clause 14.3. The scheme owner shall acknowledge the report within five working days, investigate and notify an identifiable reporter of the outcome, in accordance with that policy.

Where the report concerns a certified organisation, the scheme owner and certification body shall coordinate their responsibilities under Scheme Document Clause 8.12.4 and PL-BM-MRK-001 Clause 14. Certification enforcement remains the responsibility of the certification body; trademark enforcement remains the responsibility of the scheme owner. A report that also constitutes a complaint shall be handled under this procedure.

2.4 Referral and independence

Where a matter is received by a body that is not responsible for handling it, that body shall forward it to the responsible body within five working days of receipt and inform the complainant or appellant in writing of the referral.

The body first receiving the matter shall acknowledge receipt within five working days, even where referral is required. It shall record and pass on the original date of receipt, which, if applicable, shall be treated as the submission date for appeal eligibility. The 60-calendar-day decision period shall run from first receipt by either the scheme owner or an authorised certification body and shall not restart on referral. The responsible body shall confirm the applicable decision deadline to the complainant or appellant.

Scheme-owner oversight and escalation shall respect Scheme Document Clause 6.2. The scheme owner shall not direct, influence or seek to influence the outcome of an individual certification decision, suspension, withdrawal or appeal.

3. Handling complaints and appeals

3.1 Public access and submission

Each subject body shall publish an accessible description of its complaints and appeals process, including an email submission channel, the applicable timeframes and the right to receive a written outcome. Certification bodies shall publish their own contact details on their websites. Complaints and appeals shall be submitted by email using the contact routes set out in Clause 2. or, where email is not practical, by post to Positive Luxury at the address shown on page 1 of this document. Submissions should be made in English; where this is not possible, the subject body shall make reasonable efforts to handle the matter in another language.

A submission should include the sender's name and contact details; the organisation and certification body concerned, where known; a clear description of the matter; relevant dates and references; supporting evidence; and the outcome sought. An appeal should also identify the decision challenged and the grounds for reconsideration.

Where the matter concerns an audit finding, the submission should identify the relevant criterion or requirement, the disputed finding and the supporting evidence. The applicable requirements in PL-BM-CRT-001 and the Scheme Document remain the basis for assessment.

Anonymous complaints may be investigated where sufficient evidence is provided. Where no contact details are available, the subject body cannot acknowledge receipt or communicate an individual outcome. An appeal shall identify the applicant or certified organisation making it and provide contact details for correspondence.

3.2 Initial appeal deadline

An appeal shall be submitted in writing to the subject body within 30 calendar days of notification of the decision being appealed. A late appeal may be admitted where the appellant demonstrates good cause. This deadline is separate from the onward escalation period in Clause 4.1.

3.3 Receipt and acknowledgement

The subject body shall acknowledge receipt of a complaint or appeal in writing within five working days of receipt. The acknowledgement shall include a unique reference, a summary of the matter as understood, the procedure and next steps, and the expected decision timeframe.

The subject body shall confirm in writing whether the matter relates to activities or decisions for which it is responsible. If it does not, the referral provisions in Clause 2.4 shall apply.

A complainant may withdraw a complaint at any time, although the subject body may continue to investigate where the matter raises concerns about scheme integrity. The subject body may decline to investigate a complaint that repeats a matter already decided or is clearly without substance, and shall give its reasons in writing where contact details are available.

3.4 Investigation and impartiality

The subject body shall gather and verify the information needed to validate the matter and reach an evidence-based decision, taking account of the relevant scheme requirements. Certified organisations shall co-operate with the certification body and scheme owner in the investigation of complaints connected with their certification.

The investigation and decision shall be carried out by personnel who were not involved in the activity or decision that is the subject of the complaint or appeal.

Personnel, including those acting in a managerial capacity, who have provided consultancy to, or been employed by, the applicant or certified organisation concerned shall not review or approve the resolution within two years following the end of that consultancy or employment.

Where no suitable uninvolved personnel are available, including where the matter concerns the Managing Director, it shall appoint a competent person from outside Positive Luxury to review and approve the decision.

3.5 Decision and timeframes

The subject body shall issue a documented decision in writing, with reasons, within 60 calendar days of receipt, calculated in accordance with Clause 2.4 where the matter has been referred. Where no decision has been issued within 30 calendar days of receipt, the subject body shall send a brief written progress update, where contact details are available. Where the complexity of the matter justifies a longer period, it shall inform the complainant or appellant in writing, within the original 60-day period, of the reason for the delay and the revised decision timeline. The total period should not normally exceed 90 calendar days from receipt.

The decision shall identify the matter investigated, findings of fact, requirements applied, reasoning and outcome. Where it changes a finding or requires further action, the notice shall explain that action and who is responsible for it.

3.6 Notice of outcome

The subject body shall give formal written notice of the outcome and the end of its complaints or appeals process. For complaints, formal notice shall be given whenever possible; for appeals, it shall be given in all cases. A certification-body outcome notice shall identify the onward escalation route and the 30-calendar-day deadline in Clause 4.1. Where Clause 5.2 limits what can be shared, the notice shall at least state whether the complaint was upheld and whether it has led to any change in public certification status.

3.7 Subsequent action

The subject body shall take and record any subsequent action needed to resolve the matter. Changes to certification status shall be decided and implemented by the certification body under the relevant Scheme Document provisions, including Clauses 8.10 and 8.11. Associated directory updates and Mark or Passport consequences shall be managed under the Scheme Document and PL-BM-MRK-001.

Lodging an appeal does not automatically suspend the decision being appealed or restore permission to use the Butterfly Mark or Digital Butterfly Passport. Existing certification restrictions and Mark or Passport use requirements shall continue to apply in accordance with the Scheme Document and PL-BM-MRK-001 unless and until the relevant decision is changed by the body authorised to make it.

3.8 No detriment

No applicant, certified organisation or other person shall be subject to discriminatory action by the certification body or scheme owner as a consequence of lodging a complaint or appeal in good faith.

4. Onward escalation

4.1 Escalation to the scheme owner

A complainant or appellant who remains dissatisfied with a certification body's decision may escalate the matter to complaints@positiveluxury.com within 30 calendar days of notification of that decision. The escalation should include the original submission, the decision and the reasons for continued dissatisfaction.

The scheme owner shall review the handling of the matter, consistent application of the scheme and any implications for scheme integrity, applying the acknowledgement, impartiality and decision requirements in Clause 3. Any certification reconsideration shall remain with the certification body. Escalation does not transfer certification decision-making authority to the scheme owner.

Where the scheme owner finds that the matter was not handled in accordance with this procedure or the Scheme Document, it may, without directing the outcome, require the certification body to reconsider the matter using personnel not previously involved, and may take action under the Certification Body Agreement. The scheme owner shall inform the complainant or appellant in writing of its findings and any next steps.

4.2 Further routes

A complainant or appellant who remains dissatisfied with the scheme owner's decision may pursue any other remedy available under applicable law, including, where applicable, escalation to the relevant accreditation body or consumer protection authority in the relevant jurisdiction, as provided in Scheme Document Clause 8.13.5.

5. Records and confidentiality

5.1 Records and retention

Each subject body shall maintain records of the submission, validation, investigation, evidence considered, decision, outcome notice, referrals or escalation, and subsequent action taken. Records shall be stored securely, with controlled access, and remain retrievable in a usable form throughout the retention period.

Certification bodies shall retain these records for at least six years from the date of the most recent certification activity to which they relate, or for the period required by applicable law if longer, in accordance with Scheme Document Clause 8.14. The scheme owner shall retain its complaints and appeals records, including cases unrelated to a certification cycle, for at least six years after case closure, or for the period required by applicable law if longer. This retention period shall be reflected in its documented records procedure.

5.2 Confidentiality and disclosure

Information obtained or created during handling shall be managed confidentially. Information about an applicant or certified organisation shall not be disclosed to a third party without the organisation's written consent, except as permitted by Scheme Document Clause 5.3: disclosure required to the scheme owner under the Certification Body Agreement; disclosure required by law, a competent accreditation body or a court order; or publication of certification directory information under Clause 8.8.

Where a certification body is legally required to disclose confidential information about an applicant or certified organisation, it shall inform that organisation of the information disclosed unless prohibited by law. Referrals, investigation and outcome notices shall respect these confidentiality requirements.

Underlying non-conformity details and corrective actions shall remain confidential in accordance with Scheme Document Clause 8.10.4. A change in public certification status shall be reflected in the relevant directory without disclosing confidential investigation details.

A complainant's identity shall not be disclosed to the organisation complained about without the complainant's consent, unless disclosure is required by law or is necessary to investigate the matter; in that case, the complainant shall, where lawful, be informed before disclosure takes place.

6. Review and amendment

The scheme owner shall review this procedure at least every 24 months, or sooner where a material change to the Scheme Document, ISO/IEC 17065:2012 or applicable law makes review necessary. The scheme owner shall also review complaints and appeals at least annually to identify trends and any improvements needed to the scheme. The next scheduled review is September 2028.

Amendments shall be approved through the scheme owner's document-control arrangements, communicated to authorised certification bodies and made publicly available. The document identification and version history shall be updated on issue of a revised version.