

Appendix 1d. Review of the Programme for Endorsement of Forest Certification schemes

This appendix contains the full results of the review of the PEFC against the UK Government criteria.

Executive Summary

Date of Current Assessment: May 2006 (published December 2006)

Anticipated Date of Next Assessment: May 2008

Current Status

Meets requirements for legality.

Meets requirements for sustainability.

Changes from last assessment

The PEFC probationary period has now ended.

Source Documents

PEFC Council Technical Document, 28 October 2005

PEFC Council Technical Document Annex 1 PEFC Terms and Definitions, 29 October 2005

PEFC Council Technical Document Annex 2 Rules for Standard Setting, 28 October 2005

PEFC Council Technical Document Annex 3 Basis for Certification Schemes and their Implementation, 28 October 2005

PEFC Council Technical Document Annex 4 Chain of Custody of Forest Based Products – Requirements, 17 June 2005

PEFC Council Technical Document Annex 5 PEFC Logo Use Rules, 28 October 2005

PEFC Council Technical Document Annex 6 Certification and Accreditation Procedures, 28 October 2005

PEFC Council Technical Document Annex 7 Endorsement and Mutual Recognition of National Schemes and their Revision, 27 October 2006

PEFC Reference Document PEOLG Pan European Operational level Guidelines for SFM, June 1998

PEFC Council Guidelines GL5/2006. Interpretation of the PEFC Council Requirements for Consensus in the Standard Setting Process, 26 October 2006.

1. Forest Standards

1.1. Content of standards for legal compliance

Criteria	Findings	Score	L ¹	S
1.1.1 The standard requires that the forest owner/manager holds legal use rights to the forest	Adequately addressed through PEOLG Criterion 6.1b: <i>'Property rights and land tenure arrangements should be clearly defined, documented and established for the relevant forest area. Likewise, legal, customary and traditional rights related to the forest land should be clarified, recognised and respected.'</i>	2	✓	
1.1.2 The standard requires compliance from both the forest management organisation and any contractors with local and national legal requirements including those relevant to: <ul style="list-style-type: none"> • Forest management • Environment • Labour and welfare • Health & safety • Other parties' tenure and use rights 	Adequately addressed by the following: PEFC Technical Document 4.6 International Conventions and Legislation <i>'National forest certification criteria and certified forest management shall respect the relevant legal requirements, national policies and programmes....</i> <i>The core Conventions of the ILO...whether ratified or not, will be respected in the implementation of SFM. If the country has ratified the core ILO Conventions, their requirements can be considered to be covered by legislation. In cases where the core ILO Conventions are not ratified, their requirements shall be considered and taken into account in the certification criteria.'</i> PEFC Technical Document Annex 3 section 3.2 states that <i>'National laws, regulations, programs and policies shall be respected in forest management and certification.'</i> <i>'Certification schemes may not contradict legislation and any apparent violations of the legislation shall be taken into consideration in internal and external audits.'</i>	2	✓	
1.1.3 The standard requires payment of all relevant royalties and taxes	Partially addressed. There is no specific reference to the payment of royalties and taxes. However, this is partially covered by legal compliance. PEFC Technical Document Annex 3 section 3.2 states that <i>'National laws, regulations, programs and policies shall be respected in forest management and certification.'</i>	1	✓	

¹ L: required to meet requirements for legal, S: required to meet requirements for sustainable variant

Criteria	Findings	Score	L'	S
1.1.4 The standard requires compliance with the requirements of CITES.	<p>Adequately addressed by Technical Document section 4.7 Other international conventions:</p> <p><i>'Other international conventions relevant in forest management and ratified by country will be respected through the legislative framework.'</i> CITES is then quoted as an example.</p> <p><i>'The requirements agreed in the conventions, even if they are not ratified, will be respected in the certification criteria to the degree they are covered in PEOLG or other reference basis approved by the PEFC Council.'</i></p> <p>In addition, PEFC Council Technical Document Annex 4 section 3.6.4 states <i>'The organisation procuring raw material originating from threatened and endangered species classified by CITES shall follow all regulations defined by CITES and other international as well as national legislation.'</i></p>	2	✓	

1.2. Content of standards for sustainable variant

Criteria	Findings	Score	L	S
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Criteria	Findings	Score	L	S
<p>1.2.1 Certification standards must be consistent with a widely accepted set of international principles and criteria defining sustainable or responsible forest management at the forest management unit level.</p>	<p>Adequately addressed. The Pan-European Operational Level Guidelines (PEOLG), an intergovernmental process designed for use at the FMU level, are the main reference for development of standards in Europe (Technical Document Clause 4.2 and Annex 3 Clause 3.1.2).</p> <p>In addition, the ATO/ITTO principles, criteria and indicators for the sustainable forest management of African tropical forests (ATO/ITTO PCI) is used for countries which are covered by that process (Technical Document Clause 4.3 and Annex 3 Clause 3.1.3).</p> <p>However, for other regions, inter-governmental criteria and indicators that have not been designed for use at FMU level are required to be used as the basis for national certification standards, such as the Montreal Process (Technical Document Clause 4.4 and Annex 3 Clause 3.1.4) and other regional processes (Technical Document Clause 4.5 and Annex 3 Clause 3.1.5). In such cases, the Pan-European Operational Level Guidelines (PEOLG) is also used '<i>as a reference basis in the endorsement and mutual recognition assessments</i>' for national certification standards, although PEOLG is designed for application only to Europe.</p>	2		✓
<p>1.2.2 The standard must be performance-based.</p>	<p>Adequately addressed.</p> <p>The PEOLG and other intergovernmental processes contain performance requirements.</p>	2		✓
<p>1.2.3 The standard must ensure that harm to ecosystems is minimised. In order to do this the standard must include requirements for:</p> <p>a. Appropriate assessment of impacts and planning to minimise impacts;</p> <p>b. Protection of soil, water and biodiversity;</p> <p>c. Controlled and appropriate use of chemicals and use of Integrated Pest Management</p>	<p>Adequately addressed.</p> <p>a. There is no specific single requirement to assess the impacts of forest management, but it is addressed explicitly or implicitly throughout the PEOLG through requirements which require impacts to be minimised (such as Criterion 2.1c '<i>Forest management plans or their equivalents should specify ways and means to minimise the risk of degradation of and damages to forest ecosystems.</i>')</p> <p>b. Adequately addressed. Protection of soil, water and biodiversity is addressed in several places, but in particular protection of soil and water is fully addressed through Criterion 5 <i>Maintenance and appropriate enhancement of</i></p>	2		✓

Criteria	Findings	Score	L	S
<p>wherever possible.</p> <p>d. Proper disposal of wastes to minimise any negative impacts.</p>	<p><i>protective functions in forest management (notably soil and water); protection of biodiversity is specifically addressed through Criterion 4 Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems</i></p> <p>c. Adequately addressed through PEOLG Criterion 2.2c: <i>'The use of pesticides and herbicides should be minimised, taking into account appropriate silvicultural alternatives and other biological means.'</i></p> <p>PEOLG Criterion 2.2d also states that <i>'In case fertilisers are used they should be applied in a controlled manner and with due consideration to the environment.'</i></p> <p>PEOLG Criterion 2.2a requires that <i>'Forest management practices should make best use of natural structures and processes and use preventive biological measures wherever and as far as economically feasible to maintain and enhance the health and vitality of forests.'</i></p> <p>d. Adequately addressed through PEOLG Criterion 2.2b: <i>'The spillage of oil through forest management operations or the indiscriminate disposal of waste on forest land should be strictly avoided.'</i></p>			
<p>1.2.4 The standard must seek to ensure that productivity of the forest is maintained. In order to do this the standard must include requirements for:</p> <p>a. Management planning and implementation of management activities to avoid significant negative impacts on forest productivity.</p> <p>b. Monitoring which is adequate to check compliance with all requirements, together with review and feedback into planning.</p> <p>c. Operations and operational procedures which minimise</p>	<p>Adequately addressed.</p> <p>a. Criterion 1.1c requires that <i>'Management plans or their equivalents, appropriate to the size and use of the forest area, should be elaborated and periodically updated. They should be based on legislation as well as existing land use plans, and adequately cover the forest resources.'</i> In addition, for each of the six Pan-European criteria there is a section on specific management planning required.</p> <p>b. Adequately addressed through PEOLG Criterion 1.1d: <i>'Monitoring of the forest resources and evaluation of their management should be periodically performed, and their results should be fed back into the planning process.'</i></p> <p>Criterion 2.1b requires period monitoring of the health and vitality of forests including <i>'pests, diseases, overgrazing and overstocking, fire, and</i></p>	2		✓

Criteria	Findings	Score	L	S
<p>impacts on the range of forest resources and services.</p> <p>d. Adequate training of all personnel, both employees and contractors.</p> <p>e. Harvest levels that do not exceed the long-term production capacity of the forest, based on adequate inventory and growth and yield data.</p>	<p><i>damage caused by climatic factors, air pollutants or by forest management operations’.</i></p> <p>c. Adequately addressed through PEOLG Criterion 1.2a states that <i>‘preferring techniques that minimise direct or indirect damage to forest, soil or water resources.’</i></p> <p>Criterion 3.2a which requires that <i>‘Forest management practices should be ensured in quality with a view to maintain and improve the forest resources...’</i></p> <p>Criterion 3.2b: <i>‘Regeneration, tending and harvesting operations should be carried out in time, and in a way that do not reduce the productive capacity of the site, for example by avoiding damage to retained stands and trees as well as to the forest soil, and by using appropriate systems.’</i></p> <p>In addition, each of the six criteria has a section on guidelines for forest management practice.</p> <p>d. Adequately addressed through PEOLG Criterion 6.1e which requires <i>‘Forest managers, contractors, employees and forest owners should be provided with sufficient information and encouraged to keep up to date through continuous training in relation to sustainable forest management.’</i></p> <p>e. Adequately addressed through:</p> <p>Criterion 1.1b which requires adequate inventory and mapping of resources.</p> <p>PEOLG Criterion 1.2a: <i>‘Forest management practices should safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates...’</i></p> <p>PEOLG Criterion 3.2c: <i>‘Harvesting levels of both wood and non-wood forest products should not exceed a rate that can be sustained in the long term, and optimum use should be made of the harvested forest products, with due regard to nutrient offtake.’</i></p>			
<p>1.2.5 The standard must seek to ensure that forest ecosystem health and vitality is maintained. In order to do</p>	<p>This is adequately addressed through PEOLG Criterion 2 which refers explicitly to the maintenance of forest ecosystem health and vitality.</p>	2		✓

Criteria	Findings	Score	L	S
<p>this the standard must include requirements for:</p> <p>a. Management planning which aims to maintain or increase the health and vitality of forest ecosystems</p> <p>b. Management of natural processes, fires, pests and diseases.</p> <p>c. Adequate protection of the forest from unauthorised activities such as illegal logging, mining and encroachment.</p>	<p>a. Adequately addressed through PEOLG Criterion 2.1a: <i>'Forest management planning should aim to maintain and increase the health and vitality of forest ecosystems and to rehabilitate degraded forest ecosystems, whenever this is possible by silvicultural means.'</i></p> <p>b. Adequately addressed through PEOLG Criterion 2.1b: <i>'Health and vitality of forests should be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.'</i></p> <p>Criterion 2.2a encourages diversity to maximise natural protection from natural processes.</p> <p>c. Adequately addressed. There is no explicit requirement to protect the forest from unauthorised activities, but PEOLG Criterion 2.1c requires that <i>'Forest management plans or their equivalents should specify ways and means to minimise the risk of degradation of and damages to forest ecosystems.'</i></p>			
<p>1.2.6 The standard must seek to ensure that biodiversity is maintained. In order to do this the standard must include requirements for:</p> <p>a. Implementation of safeguards to protect rare, threatened and endangered species.</p> <p>b. The conservation/set-aside of key ecosystems or habitats in their natural state.</p> <p>c. The protection of features and species of outstanding or exceptional value.</p>	<p>Criterion 4 requires the maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems. However it does not fully address the requirements.</p> <p>a. Partially addressed. There is a requirement in PEOLG Criterion 4.1a requiring forest management planning <i>'to maintain, conserve and enhance biodiversity on ecosystem, species and genetic level and, where appropriate, diversity at landscape level.'</i> In addition, a number of requirements in 4.2 relate to protecting rare species. However, there are not specific requirements on protection of rare, threatened and endangered species.</p> <p>b. Partially addressed. PEOLG Criteria 4.1b recognises that: <i>'Forest management planning and terrestrial inventory and mapping of forest resources should include ecologically important forest biotopes, taking into account protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes, areas containing endemic species and</i></p>	1		✓

Criteria	Findings	Score	L	S
	<p><i>habitats of threatened species, as defined in recognised reference lists, as well as endangered or protected genetic in situ resources.</i> The only specific requirement for protection is PEOLG Criterion 4.2i: <i>'Special key biotopes in the forest such as water sources, wetlands, rocky outcrops and ravines should be protected or, where appropriate, restored when damaged by forest practices'</i>, which is not explicit about other representative ecosystems or about the need to ensure that the outcome is that biodiversity is maintained.</p> <p>c. Partially addressed. Criterion 4.1b requires the identification of areas of importance for biodiversity, while 5.1 requires identification of areas of significance for their protective functions. However, requirements for the protection of such features or species are less explicit.</p>			

1.3. Standard-setting process

Criteria	Findings	Score	L	S
1.3.1 The standard-setting process must be consistent with the requirements of <i>ISO Guide 59: Code of Good Practice for Standardisation</i> or the <i>ISEAL Code of Good Practice for Setting Social and Environmental Standards</i> or equivalent.	Adequately addressed by PEFC Council Technical Document Annex 2. Section 2 states that <i>'The document (Annex 2) covers standard setting procedures for certification of sustainable forest management and chain of custody certification. The procedures are based on requirements of ISO Guide 59.'</i>	2		✓
1.3.2 The standard-setting process must seek to ensure balanced representation and input from the economic, environmental and social interest categories.	<p>Partially addressed. PEFC Technical Document Annex 2 section 3.5.1 Forum for standard setting states that</p> <p><i>'The process of development of certification criteria shall be initiated by national forest owners' organisations or national forestry sector organisations having the support of major forest owners' organisations in that country. All relevant interested parties will be invited to participate in this process.</i></p> <p><i>A forum (e.g. committee, council, working group) shall be created to which interested parties are invited to participate in the process. The invited parties should represent different</i></p>	1		✓

	<p><i>aspects of sustainable forest management and include, e.g. forest owners, forest industry, environmental and social non-governmental organisations, trade unions, retailers and other relevant organisations at national or sub-national level.'</i></p> <p><i>Participation in the Forum shall be organised according to its respective consensus – building procedures which should provide for balanced representation of interest categories such as producers, buyers, consumers etc'</i></p> <p>The forum provides access for the full range of stakeholder groups to participate in the standard-setting process, it is not required to actively seek to ensure that the full range are engaged and involved.</p>			
<p>1.3.3 The standard-setting and decision-making process adopted must seek to ensure:</p> <ul style="list-style-type: none"> • No single interest can dominate the process; • No decision can be made in the absence of agreement from the majority of an interest category. 	<p>Partially addressed.</p> <p>PEFC Technical Document Annex 2 section 3.5.1 Forum for standard setting states that</p> <p><i>'Formal approval of standards shall be based on evidence of consensus.'</i></p> <p><i>'Participation in the Forum shall be organised according to its respective consensus – building procedures which should provide for balanced representation of interest categories such as producers, buyers, consumers etc'</i></p> <p>The adopted definition of consensus (Annex 1) is taken from ISO Guide 2, which requires <i>'the absence of sustained opposition to substantial issues by any important part of the concerned interests'</i> but need not imply unanimity.</p> <p>However, evaluations of PEFC-endorsed national schemes by CPET have shown that implementation of Annex 2 requirements on consensus has been variable. There are endorsed national schemes using voting mechanisms that are not consistent with the Annex 2 requirements. In response, PEFC Council have recently clarified requirements for consensus and strengthened the process of assessing national schemes.</p> <p>The PEFC Council interpretation of requirements for consensus have now been further detailed in <i>Guideline GL5/2006</i>. This explicitly allows for voting, with the safeguard that "a negative vote which represents sustained opposition of any</p>	1		✓

	<p>important part of the concerned interests to a substantive issue” triggers a further negotiation and dispute resolution process.</p> <p><i>Guideline GL5</i> does not provide definitions of “any important part of the concerned interests” or “substantive issue”. However, PEFC have confirmed that groups such as small forest owners, ENGOs or indigenous peoples would be considered as an “important part of the concerned interests”.</p> <p>PEFC Council have also now (Board resolution in October 2006, amendments to Annex 7) introduced a mandatory peer review of the national scheme assessment report. The Panel of Experts for undertaking a peer review is required to include “a broad range of interests including:</p> <ul style="list-style-type: none"> • Forestry • Certification and accreditation processes • NGOs (including social and environmental interests) • Market access.” <p>PEFC have confirmed that a programme of training for scheme assessors and peer reviewers will specifically reinforce the issues covered by <i>Guideline GL5</i>.</p>			
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2. Certification

Criteria	Findings	Score	L	S
2.1 Certification must be undertaken by a body whose organisation, systems and procedures conform to applicable ISO guidance, or publicly available equivalent.	<p>Adequately addressed by PEFC Technical Document Annex 6.</p> <p>Annex 6 Clause 3.1 requires that <i>‘Certification bodies considered competent by the PEFC Council to carry out forest and/or chain of custody verification, shall fulfil the following qualifications:</i></p> <p><i>1. The certification body shall fulfil requirements defined in ISO Guide 62, ISO Guide 66, ISO Guide 65, EC Regulation 761/2001 (EMAS) or other requirements defined by the national accreditation body.</i></p>	2	✓	✓
2.2 Certification is undertaken	Partially addressed by PEFC Technical	1	✓	✓

Criteria	Findings	Score	L	S
<p>by a body which is accredited to evaluate against forest management standards.</p>	<p>Document Annex 6.</p> <p>Annex 6 Clause 3.1 requires that:</p> <p><i>Compliance of the certification body with the above requirements shall be verified by an accreditation as described in (Annex 6) section 5.</i></p> <p>Annex 6 section 5 states that <i>'The two following options are recognised by the PEFC Council for forest management certification and chain of custody against a scheme specific chain of custody standard:</i></p> <p>a) <i>A certification body carrying out forest management and/ or chain of custody certification shall have accreditation from a national accreditation body that covers forest management/ chain of custody certification as a specified field of operation.</i></p> <p>b) <i>A certification body carrying out forest management and/ or chain of custody certification as a part of the QMS (Quality Management System as defined by 9001:2000), EMS (Environmental Management System as defined by ISO14001) or EMAS (Environmental Management and Auditing System as defined by EC Regulation 761/2001) certification shall have accreditation from a national accreditation body that covers QMS, EMS or EMAS accreditation in that specific sector.'</i></p> <p>Option (b), above, does not ensure that the scope of accreditation covers the elements set out in criteria 2.3 – 2.6.</p> <p>Section 5 goes on to state that <i>'With effect from this General Assembly certification bodies, which carry out forest management certification, shall fully meet the accreditation requirements within four years of the first certification carried out according to the relevant national scheme, or PEFC Council document(s) in the case of chain of custody certification.</i></p> <p><i>The PEFC Council General Assembly can approve a temporary exemption from the</i></p>			

Criteria	Findings	Score	L	S
	<i>above requirements...</i>			
2.3 The requirements for certification audits must include assessment of systems and documentation together with verification of outcomes in the forest adequate to ensure that both system and performance requirements in the standard are being met.	This is not addressed specifically in Technical Document Annex 6 Section 4. However, the required compliance with ISO guidance (criterion 2.1 above) provides an adequate basis.	2	✓	✓
2.4 The certification audit must include sufficient consultation with external stakeholders to ensure that all relevant issues are identified relating to compliance with the requirements of the standard.	Partially addressed by PEFC Technical Document Annex 6. Section 4 states that <i>'The audit evidence to determine the conformity with the forest management standard shall include relevant information from external parties (e.g. government agencies, community groups, conservations organisations etc) as appropriate.'</i> This does not specifically require that stakeholder consultation must be designed to ensure the identification of all relevant issues.	1		✓
2.5 A summary of the results of the certification audit (excluding confidential information) must be publicly available to interested parties.	Partially addressed by PEFC Technical Document Annex 6. Section 4 states that <i>'A summary of the certification report, including a summary of findings on the auditee's conformity with the forest management standard, written by the certification body, shall be made available to the public by the auditee or in accordance with any applicable requirements defined by the respective forest certification scheme.'</i> However, Annex 6 does not require that the public summary must be available on a relevant website, as now required to score 2.	1		✓

Criteria	Findings	Score	L	S
2.6 There is an accessible and functioning mechanism for dealing with complaints and disputes which is open to any interested party.	<p>Adequately addressed.</p> <p>Resolution of disputes relating to certification decisions are covered in Annex 3 Clause 6.2 which refers to the dispute resolution mechanisms required for certification bodies and accreditation bodies.</p> <p>PEFC Council Technical Document Annex 3 section 6 on appeals, complaints and dispute procedures: <i>'The PEFC Council National Governing Body sets up or appoints an impartial and independent dispute settlement body on a permanent basis or shall have written procedures for the establishment of a dispute settlement body on an ad hoc basis.</i></p> <p><i>In forest certification, the dispute settlement body takes care of all complaints arising from implementation of group or regional certification, interpretation of certification requirements, etc if these cannot be solved between the involved parties or do not lie in the competence of the certification or accreditation bodies.</i></p> <p><i>The dispute settlement body also resolves possible grievances in chain of custody certification that do not exclusively concern an applicant and a certification body.'</i> [Section 6.1.]</p>	2	✓	✓

3. Accreditation

Criteria	Findings	Score	L	S
3.1 Accreditation must be undertaken by a national or international body whose organisation, systems and procedures are consistent with ISO 17011:2004 <i>Conformity assessment -- General requirements for accreditation bodies accrediting conformity assessment bodies</i> or equivalent.	<p>Adequately addressed by PEFC Technical Document Annex 6. Section 5 states that <i>'Accreditation bodies shall be part of the European co-operation for Accreditation (EA) and/ or the International Accreditation Forum (IAF) umbrella and implement procedures described in ISO/IEC 17011:2004 and other documents recognised by the above organisations'</i></p>	2	✓	✓

4. Chain of custody

Criteria	Findings	Score	L	S
4.1 Assessment of chain of custody must be undertaken by a certification body operating in accordance with ISO Guide 65 or equivalent and accredited by an accreditation body operating in accordance with ISO 17011 or equivalent.	<p>Adequately addressed by PEFC Technical Document Annex 6.</p> <p>Certification: Section 3.1 states that <i>'The certification body carrying out chain of custody certification against Annex 4 (Chain of Custody of Forest Based Products – Requirements) shall fulfil requirements defined in ISO Guide 65 (EN 45011).</i></p> <p>Accreditation: Section 5 states that <i>'Certification bodies carrying out forest management or chain of custody certification, shall be accredited by a national accreditation body so as to ensure the credibility of the certification work and to facilitate mutual recognition.</i></p> <p><i>Accreditation bodies shall be part of the European co-operation for Accreditation (EA) and/ or the International Accreditation Forum (IAF) umbrella and implement procedures described in ISO/IEC 17011:2004 and other documents recognised by the above organisations'</i></p>	2	✓	✓
4.2 There must be a certified chain of custody in place from the forest of origin to the final certified product which provides a link between the certified material in the product or product line and certified forests .	<p>Adequately addressed through PEFC Technical Document Annex 4, which sets out the requirements and approaches for chain of custody: <i>'This standard specifies requirements for chain of custody which the organisation must meet if its declarations and/ or labels referring to the origin of raw material used in the products sold/ transferred is to be recognised as credible and reliable.</i></p> <p><i>This standard specifies two optional approaches for chain of custody, namely physical separation and percentage-based methods.'</i></p>	2	✓	✓
4.3 If mixing of certified and uncertified material in a product or product line is allowed, the uncertified material must be covered by a verifiable system which is designed to ensure that it is from legal sources.	<p>Adequately addressed by PEFC Technical Document Annex 4 section 3.6:</p> <p>3.6.1 <i>'The organisation shall establish adequate measures to ensure that the certified products do not include raw material from controversial sources.</i></p> <p>3.6.2 <i>The organisation shall require from all</i></p>	2	✓	

Criteria	Findings	Score	L	S
	<p><i>suppliers of the forest based raw material, which is not classified as certified raw material, at least a signed self-declaration that the supplied raw material does not originate from a controversial source. The organisation, which has signed contracts with its suppliers, shall include such a declaration in the contracts.</i></p> <p><i>3.6.3 The organisation shall evaluate the potential risk of procuring raw material from controversial sources and establish a sampling based programme of second or third party verification of the suppliers self-declarations if a high risk exists that raw material originates from controversial sources.'</i></p> <p>Controversial sources are defined as 'illegal or unauthorised harvesting' (section 1.3 definitions)</p>			
<p>4.4 If mixing of certified and uncertified material in a product or product line is allowed and the proportion of uncertified material can exceed 30%, then the uncertified material must be covered by a verifiable system which ensures that it is from sustainable forest sources where the requirements for sustainability set out in criteria 1.2.3 – 1.2.6 above are being met.</p>	<p>There is no requirement for a verifiable system which is designed to ensure that the forests of origin of all uncertified material meet the requirements of sections 2.1.3 – 2.1.6 above.</p>	0		✓
<p>4.5 There is a clearly defined mechanism for controlling all claims made about the certified nature of products which ensures that claims are clear and accurate and that action is taken to prevent any false or misleading claims.</p>	<p>Adequately addressed. PEFC Technical Document Annex 5 contains detailed requirements on logo use: '<i>The objective of the document is to set up rules for PEFC logo use to assure the protection of ownership rights of PEFC Logo and transparent and credible communication of claims connected with PEFC certification to avoid any misleading or misunderstanding of PEFC messages.'</i></p>	2	✓	✓

Criteria	Findings	Score	L	S
<p>4.6 If recycled material is used there must be a verifiable system in place which is designed to ensure that recycled material is from the following categories:</p> <ul style="list-style-type: none"> • Pre-consumer recycled wood and wood fibre or industrial by-products but excluding sawmill co-products • Post-consumer recycled wood and wood fibre • Drift wood 	<p>Adequately addressed.</p> <p>PEFC Technical Document Annex 4 Appendix 1, states that <i>'The definition of the origin defined by this Appendix shall be used together with the requirements of this standard when organisation establishes a chain of custody to use the PEFC logo and/ or declarations.'</i></p> <p>Annex 4 sets out the requirements for chain of custody related to identification of origin: <i>'The organisation shall identify and verify the category of the origin of all procured raw material.'</i> (sections 2.2.1, 3.2.1).</p> <p>Neutral raw material is defined as including <i>'Recycled wood and recycled fibres'</i> which is further defined (section 1.3.15) as <i>'post consumer wood and fibres and pre-consumer byproducts'</i>. .</p>	2	✓	✓