

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

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

## **Executive Summary**

Date of Current Assessment: June 2008 (published November 2008)

Anticipated Date of Next Assessment: May 2010

### **Current Status**

Meets requirements for legality.

Meets requirements for sustainability.

### **Changes from last assessment**

None.

## **Source Documents**

PEFC Council Technical Document, 5 October 2007

PEFC Council Technical Document Annex 1 PEFC Terms and Definitions, 27 October 2006

PEFC Council Technical Document Annex 2 Rules for Standard Setting, 27 October 2006

PEFC Council Technical Document Annex 3 Basis for Certification Schemes and their Implementation, 5 October 2007

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, 5 October 2007

PEFC Council Technical Document Annex 6 Certification and Accreditation Procedures, 5 October 2007

PEFC Council Technical Document Annex 7 Endorsement and Mutual Recognition of National Schemes and their Revision, 5 October 2007

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

PEFC Council Guidelines GL2/2008. Minimum Requirements Checklist, 31 January 2008.

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

PEFC Council Guidelines GL7/2007. Procedures for the Investigation and Resolution of Complaints and Appeals, 28 June 2007

PEFC Council Guidelines GL8/2008. Involvement of the Panel of Experts in the Endorsement of National Forest Certification Schemes, 30 April 2008.

# 1. Forest Standards

## 1.1. Content of standards for legal compliance

Criteria	Findings	Score	L <sup>1</sup>	S
1.1.1 The standard requires that the forest owner/manager holds legal use rights to the forest	Fully addressed  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>  ITTO sub-indicator 4.1.1.1 "provisions of forest law on rights of use and ownership are known and respected".	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"> <li>• Forest management</li> <li>• Environment</li> <li>• Labour and welfare</li> <li>• Health &amp; safety</li> <li>• Other parties' tenure and use rights</li> </ul>	Fully addressed  PEFC Council Technical Document Annex 3, section 3.2 states that <i>'National laws, regulations, programs and policies shall be respected in forest management and certification. Certification schemes may not contradict legislation and any apparent violations of the legislation shall be taken into consideration in internal and external audits.'</i>  Section 3.5: <i>'The national certification criteria shall:</i> <ul style="list-style-type: none"> <li>- <i>require compliance with national legislation</i></li> <li>- <i>be in compliance with the fundamental International labour Organisation (ILO) Conventions. If the requirements of the Conventions are incorporated into national legislation, which is the case when a country has ratified the Conventions, the certification criteria shall require compliance with the national legislation relevant to the core ILO conventions.'</i></li> </ul>	2	✓	

<sup>1</sup> L: required to meet requirements for legal, S: required to meet requirements for sustainable variant

Criteria	Findings	Score	L'	S
1.1.3 The standard requires payment of all relevant royalties and taxes	<p>Partially addressed</p> <p>There is no specific reference to payment of fees. PEFC Council 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>' Section 3.5 states that: '<i>The national certification criteria shall:</i></p> <ul style="list-style-type: none"> <li>- <i>require compliance with national legislation</i></li> </ul>	1	✓	
1.1.4 The standard requires compliance with the requirements of CITES.	<p>Fully addressed</p> <p>Technical Document Annex 3 section 3.4 Other international conventions:</p> <p><i>'Other international conventions relevant to forest management and ratified by country will be respected through the legislative framework. Such conventions include, amongst others, e.g. Convention on Biological Diversity, Kyoto Protocol and Carbon Sinks, Convention on International Trade in Endangered Species of Wild Fauna and Flora and Biosafety Protocol.'</i></p> <p><i>'The requirements agreed upon in the conventions, even if they are not ratified by the country, 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
1.2.1 Certification standards must be consistent with a widely accepted set of international principles and criteria defining sustainable or	<p>Fully addressed</p> <p>PEFC Council Technical Document Section 4.2: '<i>The certification criteria to be used in PEFC endorsed and mutually recognized national or sub-national schemes in Europe are based on the</i></p>	2		✓

Criteria	Findings	Score	L	S
responsible forest management at the forest management unit level.	<p><i>current Pan-European Criteria for Sustainable Forest Management as a common framework. The Pan European Operational Level Guidelines (PEOLG) interprets the six criteria for practical forest management. The PEFC Council adopts these base documents as amended in periodic revisions of national schemes. The current Pan-European Operational Level Guidelines will form the reference basis when national or sub-national certification criteria are elaborated or revised.'</i></p> <p>Section 4.3: <i>'The current ATO/ITTO PCI will form the reference basis when national or subnational certification criteria are elaborated or revised in countries covered by ATO/ITTO PCI.'</i></p> <p>Section 4.4: <i>'The following ITTO guidelines, which are based on ITTO C&amp;I, have been developed by ITTO for the management of natural tropical forests and planted tropical forests and will form the reference basis when national certification criteria are elaborated or revised in the ITTO producing member countries except those which are covered by the ATO/ITTO PC&amp;I as per chapter 4.3. The forest certification criteria for forest management of natural tropical forests shall be compatible with:</i></p> <ul style="list-style-type: none"> <li>- <i>ITTO guidelines on the sustainable management of natural tropical forests (1992) and</i></li> <li>- <i>ITTO guidelines on the conservation of biological diversity in tropical production forests (1993)'</i></li> </ul> <p>All schemes, except those covered by ATO and ITTO, are currently assessed against the PEOLG, until other operational guidelines equivalent to the PEOLG are approved by the PEFC Council (Technical Document section 4.5). Annex 3, chapter 3.5 states that schemes must <i>"be compatible and consistent with the current PEOLG or ATO /ITTO PCI (only for countries covered by ATO/ITTO PCI) or the relevant ITTO guidelines (only for ITTO producing member countries except those covered by ATO / ITTO PCI)".</i> Any PELOG elements not covered by the ATO / ITTO and ITTO documents remain part of the PEFC assessment requirements for the</p>			

Criteria	Findings	Score	L	S
	respective regions, as reflected by the <i>Minimum Requirements Checklist</i> (GL 2/2008)			
1.2.2 The standard must be performance-based.	Partially addressed The PEOLG and other intergovernmental processes contain performance requirements.	1		✓
1.2.3 The standard must ensure that harm to ecosystems is minimised. In order to do this the standard must include requirements for: a. Appropriate assessment of impacts and planning to minimise impacts; b. Protection of soil, water and biodiversity; c. Controlled and appropriate use of chemicals and use of Integrated Pest Management wherever possible. d. Proper disposal of wastes to minimise any negative impacts.	Fully addressed 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> ') ATO/ITTO Indicator 3.1.1 requires that ' <i>Available knowledge allows an ecological assessment and diagnosis of the forest ecosystems</i> ' and in Indicator 3.1.2 that ' <i>Impact studies are carried out, in relation to the scale of harvesting, in accordance with the level and extent of scarcity of any resources of concern. These studies are incorporated into the forest management document.</i> ' b. Requirements for protection of soil, water and biodiversity are covered in several places, but in particular in criteria 4 and 5. PEOLG Criterion 5 Maintenance and appropriate enhancement of protective functions in forest management (notably soil and water). PEOLG Criterion 4 Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems. ATO/ITTO Criteria 3.3 (biodiversity) and 3.5 (water & soils) list numerous relevant indicator requirements to minimize operation impacts. c. 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> ' 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> '	2		✓

Criteria	Findings	Score	L	S
	<p>PEOLG Criterion 2.2a requires that ‘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.’</p> <p>ATO/ITTO Sub-indicator 3.5.2.4 states, that ‘Management systems promote the development and adoption of environmentally friendly, non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides, pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, are prohibited. If chemicals are used, proper equipment and training is provided to minimize health and environmental risks.’ Sub-indicator 3.3.4.3 requires ‘The use of biological control agents is documented, minimized, monitored and strictly controlled in accordance with national laws and internationally accepted scientific protocols. The use of genetically modified organisms is prohibited.’</p> <p>d. PEOLG Criterion 2.2b: ‘The spillage of oil through forest management operations or the indiscriminate disposal of waste on forest land should be strictly avoided.’</p> <p>ATO/ITTO Sub-indicator 3.5.2.5 states, that ‘<i>Chemicals, containers and liquid and solid non-organic wastes including fuel and oil are disposed of in an environmentally appropriate manner.</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</p>	<p>Fully addressed</p> <p>a. PEOLG 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>’</p> <p>PEOLG Criterion 2.1c ‘<i>Forest management plans or their equivalent should specify ways and means to minimise the risk of degradation of</i></p>	2		✓

Criteria	Findings	Score	L	S
<p>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 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>and damages to forest ecosystems. Forest management planning should make use of those policy instruments set up to support these activities.'</i></p> <p>ATO/ITTO Criterion 2.3 states that, <i>'The sustainable production of timber is ensured both in quantity and quality.'</i> Specifically Indicator 2.3.2 <i>'The felling rotation and yield are clearly determined and respected in accordance with the principles of sustainable production.'</i></p> <p>b. 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>PEOLG Criterion 2.1b requires period monitoring of the health and vitality of forests including <i>'pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations'</i>.</p> <p>ATO/ITTO Indicators 2.6.1 and 2.6.2 call for continuous monitoring of forest management activities and regular revision of the forest management document. Feedback into planning is envisaged by Indicator 3.1.4: <i>'The results of monitoring and new scientific findings or technical data are taken into account to improve forest management and harvesting practices.'</i></p> <p>c. PEOLG Criterion 1.2a states that <i>'preferring techniques that minimise direct or indirect damage to forest, soil or water resources.'</i></p> <p>PEOLG Criterion 2.2b <i>'Appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/ or soil damages should be applied.'</i></p> <p>PEOLG Criterion 3.2a requires that <i>'Forest management practices should be ensured in quality with a view to maintain and improve the forest resources...'</i></p> <p>PEOLG Criterion 3.2b: <i>'Regeneration, tending and harvesting operations should be carried out in time, and in a way that do not reduce the</i></p>			

Criteria	Findings	Score	L	S
	<p><i>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>ATO/ITTO Criterion 3 covers widely this requirement. Specifically Indicator 3.2.1 '<i>Reduced impact logging techniques are defined at the national level and implemented.</i>', and Indicator 3.3.2 '<i>Adequate procedures and guidelines exist and are implemented to identify and protect, in a manner which is representative of the diversity of habitats and at a scale adapted to the subject to be preserved:</i></p> <ul style="list-style-type: none"> <li><i>· endangered, rare or threatened species of fauna and flora; and</i></li> <li><i>· other biological components of the forest of particular interest, such as reproduction sites, rare habitats and key species'.</i></li> </ul> <p>d. PEOLG Criterion 6.1e 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>ATO/ITTO Indicator 2.4.4: '<i>The concessionaire develops a staff training policy.</i>'</p> <p>e. PEOLG Criterion 1.1b requires '<i>Inventory and mapping of forest resources should be established and maintained, adequate to the local and national conditions, and in correspondence with the topics described in these Guidelines.</i>'</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>ATO/ITTO Criterion 2.3 demands sustainable production of timber. Yield calculation is covered</p>			

Criteria	Findings	Score	L	S
	in sub-indicator 2.3.2.1 <i>'The calculation of yield and the determination of the rotation are verifiable from the forest management document'</i> and rotation cycle in sub-indicator 2.3.2.2 <i>'The rotation is based on the growth rates and minimum diameter of trees to be harvested, and on data obtained from the forest management inventory.'</i>			
1.2.5 The standard must seek to ensure that forest ecosystem health and vitality is maintained. In order to do this the standard must include requirements for: a. Management planning which aims to maintain or increase the health and vitality of forest ecosystems b. Management of natural processes, fires, pests and diseases. c. Adequate protection of the forest from unauthorised activities such as illegal logging, mining and encroachment.	Partially addressed  PEOLG Criterion 2 specifically refers to the maintenance of forest ecosystem health and vitality.  a. 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>  ATO/ITTO addresses this requirement in several indicators under Principle 3 <i>'The main ecological functions of the forest are maintained'</i> .  b. 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>  PEOLG Criterion 2.2a encourages diversity to maximise natural protection from natural processes: <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>  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>  ATO/ITTO addresses this requirement in several indicators under Principle 3 <i>'The main ecological functions of the forest are maintained'</i> .  Also sub-indicator on national level, 1.1.12.7	1		✓

Criteria	Findings	Score	L	S
	<p><i>'Phyto-sanitation and quarantine procedures are in place and enforced to prevent the introduction of pests and pathogens.'</i></p> <p>c. 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>ATO/ITTO Indicator 1.5.6: <i>'The forestry service/administration implements mechanisms recognized by law to protect forest under management from illegal occupation and other encroachment activities.'</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>Partially addressed</p> <p>a. 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></p> <p>PEOLG Criterion 4.2f requires that <i>'Infrastructure should be planned and constructed in a way that minimises damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.'</i></p> <p>ATO/ITTO Indicator 3.3.2 states, that <i>'Adequate procedures and guidelines exist and are implemented to identify and protect, in a manner which is representative of the diversity of habitats and at a scale adapted to the subject to be preserved:</i></p> <ul style="list-style-type: none"> <li><i>· endangered, rare or threatened species of fauna and flora; and</i></li> <li><i>· other biological components of the forest of particular interest, such as reproduction sites, rare habitats and key species.</i></li> </ul> <p>b. 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</i></p>	1		✓

Criteria	Findings	Score	L	S
	<p><i>riparian areas and wetland biotopes, areas containing endemic species and habitats of threatened species, as defined in recognised reference lists, as well as endangered or protected genetic in situ resources.'</i></p> <p>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></p> <p>ATO/ITTO sub-Indicator 1.1.12.1 states, that <i>'Adequate procedures and guidelines are in place and are implemented in a manner that identifies, protects and preserves the diversity of habitats and species at appropriate scales and levels:</i></p> <ul style="list-style-type: none"> <li><i>· endangered, rare or threatened species of fauna and flora;</i></li> <li><i>· the components of particular biological interest such as sites of reproduction, rare habitats and key species.'</i></li> </ul> <p>ATO/ITTO Indicator 3.3.2. , see under section 1.2.4.</p> <p>c. PEOLG Criterion 4.1b requires the identification of areas of importance for biodiversity.</p> <p>PEOLG 5.1 requires identification of areas of significance for their protective functions: <i>'Areas that fulfil specific and recognised protective functions for society should be registered and mapped, and forest management plans or their equivalent should take full account of these areas.'</i></p> <p>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></p> <p>ATO/ITTO sub-Indicator 1.1.12.1 states, that <i>'Adequate procedures and guidelines are in place and are implemented in a manner that identifies, protects and preserves the diversity of habitats and species at appropriate scales and levels:</i></p>			

Criteria	Findings	Score	L	S
	<ul style="list-style-type: none"> <li>· <i>endangered, rare or threatened species of fauna and flora;</i></li> <li>· <i>the components of particular biological interest such as sites of reproduction, rare habitats and key species.'</i></li> </ul> <p>ATO/ITTO Indicator 3.3.2. , see under section 1.2.4.</p> <p>The TP concluded that a. is not fully addressed and that c. is not fully addressed in respect of species.</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.	<p>Partially addressed</p> <p>PEFC requirements for the standard-setting process are set out in 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></p> <p>The TP concluded that the evidence provided by the above findings was not sufficient to score 2.</p>	1		✓
1.3.2 The standard-setting process must seek to ensure balanced representation and input from the economic, environmental and social interest categories.	<p>Fully addressed</p> <p>PEFC Council Technical Document Annex 2 section 3.4.1 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. Their views will be documented and considered in an open and transparent way.</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 the different aspects of sustainable forest management and include, e.g. forest owners,</i></p>	2		✓

Criteria	Findings	Score	L	S
	<p><i>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><i>- The interested parties' participation and views will be documented and considered in an open and transparent way.</i></p> <p><i>- Formal approval of standards shall be based on evidence of consensus.'</i></p> <p>The forum provides access for the full range of stakeholder groups to participate in the standard-setting process.</p>			
<p>1.3.3 The standard-setting and decision-making process adopted must seek to ensure:</p> <ul style="list-style-type: none"> <li>• No single interest can dominate the process;</li> <li>• No decision can be made in the absence of agreement from the majority of an interest category.</li> </ul>	<p>Partially addressed</p> <p>PEFC Council Technical Document Annex 2 section 4.2.1 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>The interpretation of requirements for consensus have been further detailed in <i>Guideline GL5/2006</i>. This explicitly allows for voting, with the safeguard that <i>'a negative vote which represents sustained opposition of any important part of the concerned interests to a substantive issue'</i> triggers a further negotiation and dispute resolution process. <i>Guideline GL5</i> does not provide definitions of "any important part of the concerned interests" or "substantive issue".</p>	1		✓

Criteria	Findings	Score	L	S
	<p>PEFC Council Technical Document Annex 7 details the process by which submitted national standards are subject to assessment by independent consultants, followed by a recommendation by the PEFC Council Board of Directors and a final decision by the PEFC General Assembly.</p> <p>A peer review of the national scheme assessment report may also be included in the approval process. PEFC Council Technical Document Annex 7, section 6.2.2 Assessment process and decision making: <i>'When deemed necessary the PEFC Council Board of Directors may decide to submit the assessment report for peer review to the panel of experts for quality assurance purposes.'</i></p> <p>PEFC Council Guideline GL8/2008, which provides more details on the procedure for the Panel of Experts (POE), confirms (section 2) that a <i>'decision of the Board of Directors of 26 October 2006 [which] made the PoE's review of the evaluations reports mandatory.'</i></p> <p>Relevant complaints procedures are detailed in <i>PEFC Council Guideline GL7/2007.</i></p> <p>The procedures for developing national standards require decision making by consensus in the national Forum, but there is no evidence that the PEFC Council's and Assembly's procedures adequately address the criterion. In addition the Independent Panel of Experts has included one member of the PEFC Board of Directors and therefore cannot be considered independent. If the intention is that the criterion refers only to the development and adoption of the national standard by the national Forum, the TP would give a score of 2, but this is currently unclear.</p> <p>A sample of national schemes that have been endorsed by PEFC since the previous CPET review in December 2006 were checked for compliance with PEFC scheme requirements for decision-making. The national schemes sampled were found to conform to the requirements.</p>			

## 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>Fully addressed</p> <p>PEFC Council Technical Document Annex 6 section 3.1:</p> <p><i>'The certification body carrying out forest management certification or chain of custody certification against a scheme specific chain of custody standard, shall fulfil requirements defined in:</i></p> <ul style="list-style-type: none"> <li><i>a) ISO 17021 if the certification is carried out as management system certification</i></li> <li><i>b) ISO Guide 65 (EN 45 011) if the certification is carried out as product certification (the term "product" is used in its widest sense and includes also processes and services)</i></li> <li><i>c) Other requirements for certification bodies defined by the national accreditation body.'</i></li> </ul>	2	✓	✓
2.2 Certification is undertaken by a body which is accredited to evaluate against forest management standards.	<p>Partially addressed</p> <p>PEFC Technical Document Annex 6 Section 5 states that <i>'Certification bodies carrying out forest management or chain of custody certification, shall be accredited by a national accredited body so as to ensure that the credibility of the certification work and to facilitate mutual recognition.'</i></p> <p><i>'The certification body carrying out forest management certification or chain of custody certification against a scheme specific chain of custody standard shall be accredited based on 17021 or ISO Guide 65 and the relevant forest management or chain of custody standard(s)/ scheme shall be covered by the accreditation scope.</i></p> <p><i>The certification body carrying out chain of custody certification against Annex 4 (Chain of Custody of Forest Based Products – Requirements) shall be accredited based on ISO Guide 65 (EN 45 011).</i></p> <p><i>In exceptional circumstances, the PEFC Council General Assembly can approve a time limited</i></p>	1	✓	✓

Criteria	Findings	Score	L	S
	<p><i>exemption from the above requirements based on written application from the PEFC National Governing Body. The application shall state (i) reasons for requesting exemption, (ii) description of how the credibility of the certification process will be assured including a list of measures currently undertaken to ensure the credibility.'</i></p> <p>There was found to be a lack of information about what constitutes exceptional circumstances and what procedures would replace the standard procedures.</p>			
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.	<p>Fully addressed</p> <p>This is not addressed specifically in Technical Document Annex 6 Section 4, although this does require certification bodies to operate in accordance with ISO 19011, which provides an adequate basis. Annex 6 also refers to other ISO guidance.</p>	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.	<p>Partially addressed</p> <p>PEFC Council 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></p> <p>This does not specifically require that stakeholder consultation must be designed to ensure the identification of all relevant issues.</p> <p>It is noted that the wording of PEFC Council Technical Document Annex 6 section 4 requires lenient interpretation to justify a score of 1 rather than 0. It is recommended that the PEFC strengthen the wording so that compliance with the criterion, in particular "must include sufficient consultation ... to ensure that all relevant issues are identified..."</p>	1		✓

Criteria	Findings	Score	L	S
	is explicit.			
2.5 A summary of the results of the certification audit (excluding confidential information) must be publicly available to interested parties.	<p>Partially addressed</p> <p>PEFC Council 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>'</p> <p>However, Annex 6 does not require that the public summary must be available on a relevant website.</p> <p>The scheme meets the criterion of public availability but there is no evidence that it meets the conditions specified in the Guidance for a score of 2, i.e: that the scheme requires that: (i) the public summary of the certification audit be published on a relevant web site; or (ii) the summary must be available electronically to any interested party on request within a defined timescale.<sup>2</sup></p>	1		✓
2.6 There is an accessible and functioning mechanism for dealing with complaints and disputes which is open to any interested party.	<p>Fully addressed</p> <p>PEFC Council Technical Document Annex 3 section 6 on appeals, complaints and dispute procedures:</p> <p>Section 6.1 In the implementation arrangements: '<i>The PEFC National Governing Bodies shall establish and have documented procedures for an independent dispute settlement body, either permanent or ad hoc, that takes care of those complaints arising from forest management or chain of custody scheme implementation that cannot be addressed in the dispute settlement procedures of the relevant certification or accreditation body.</i>'</p> <p>Section 6.2 In the certification audits and decisions: '<i>Accredited certification bodies have procedures for dispute settlement. All grievances between an applicant and a</i></p>	2	✓	✓

<sup>2</sup> The TP finds the Guidance too specific in the way in which it interprets the criterion and recommended that the Guidance be revised.

Criteria	Findings	Score	L	S
	<p><i>certification body on the audits, issuance, suspension, withdrawal or denial of a certificate will be handled through these procedures that are applied in each kind of certification carried out by a certification body.</i></p> <p><i>The relevant accreditation body, whose accreditation covers the certification, deals with disputes and complaints concerning observance of the accreditation requirements.'</i></p> <p>PEFC Council procedures for the investigation and resolution of complaints and appeals section 4.5 '<i>Complaints submitted regarding a specific certified entity shall be referred to the relevant certification body's own complaints / appeals resolution procedure.'</i></p>			

### 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>Fully addressed</p> <p>PEFC Council Technical Document Annex 6 section 5 states that '<i>Accreditation bodies shall be a member of the International Accreditation Forum (IAF) or a member of IAF's special recognition regional groups 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>Fully addressed</p> <p>PEFC Council Technical Document Annex 6. Certification:</p> <p>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>	2	✓	✓

Criteria	Findings	Score	L	S
	<p>Accreditation:</p> <p>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 a member of the International Accreditation Forum (IAF) or a member of IAF's special recognition regional groups and implement procedures described in ISO/IEC 17011:2004 and other documents recognised by the above organisations'</i></p>			
<p>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>	<p>Fully addressed</p> <p>PEFC Council Technical Document Annex 4 sets out the requirements and approaches for chain of custody throughout the supply chain: <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> (Section 1.1 Scope)</p> <p>The standard specifies two approaches for chain of custody, namely physical separation and percentage-based methods.</p> <p>Section 2.1.1 <i>'The organisation applying the physical separation method shall ensure that the certified raw material is separated or clearly identifiable at all stages of the production or trading process.'</i></p> <p>Section 3.1.1 <i>'The percentage based method of the chain of custody applies to organisations, which production/ trading processes certified raw material is mixed together with other raw material categories and the certified raw material cannot be clearly identified in the output products'</i></p>	2	✓	✓

Criteria	Findings	Score	L	S
<p>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>	<p>Fully addressed</p> <p>PEFC Council Technical Document Annex 4 section 3.6 Controversial sources</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 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>3.6.3 <i>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 <i>'illegal or unauthorised harvesting'</i> (section 1.3 definitions)</p> <p>Appendix 7 to Annex 4 provides requirements for the avoidance of raw materials from controversial sources outlined in section 3.6.2. These include requirements for supplier's self-declaration, risk assessment which specifies second or third party verification for high risk sources.</p>	2	✓	
<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</p>	<p>Inadequately addressed</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		✓

Criteria	Findings	Score	L	S
are being met.				
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>Fully addressed</p> <p>PEFC Council 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	✓	✓
<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"> <li>• Pre-consumer recycled wood and wood fibre or industrial by-products but excluding sawmill co-products</li> <li>• Post-consumer recycled wood and wood fibre</li> <li>• Drift wood</li> </ul>	<p>Fully addressed</p> <p>PEFC Council Technical Document 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>Appendix 6 to Annex 4 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 covering recycled raw material.'</i></p> <p>Section 3 Declarations on recycled raw material (PEFC recycled raw material):</p> <p>Section 3.1 Certified raw material, (i) <i>Post-consumer wood raw material and fibres procured directly from recycling facilities or collection centre</i></p> <p>Section 3.2 Neutral raw material. <i>'Non wood based raw material (e.g. agricultural fibre and rags), starch, pigments and wood harvested from housing areas (urban wood).</i></p> <p>Annex 4 – 1.3.13 defines post-consumer wood and fibres as not including sawmill or forestry residues.</p>	2	✓	✓