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February 2011

Analysis of the PEFC System for Forest Management Certification  
using the  
Forest Certification Assessment Guide (FCAG)

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## List of Abbreviations

ATO	African Timber Organisation
FSC	Forest Stewardship Council
FCAG	Forest Certification Assessment Guide
FMU	Forest Management Unit
GD	Guidance
IAF	International Accreditation Forum
ILO	International Labour Organisation
ISEAL	International Social and Environmental Labelling Alliance
ISO/IEC	International Standardisation Organisation
ITTO	International Tropical Timber Organisation
NA	Not applicable
NRIS	Not required by the international system
PCI	Principles, Criteria and Indicators
PEFC	Programme for the Endorsement of Forest Certification Schemes
PEFCC	Programme for the Endorsement of Forest Certification Schemes Council
PEOLG	Pan European Operational Level Guidelines
SFM	Sustainable Forest Management
SME	Small and medium sized enterprises
STD	Standard
WWF	World Wide Fund for Nature

## Executive Summary

In this study the international PEFC system was evaluated on the basis of the Forest Certification Assessment Guide (FCAG)<sup>2</sup>. The analysis takes into account the recent decisions from the PEFC General Assembly in November 2010. The results are compared to a similar evaluation of PEFC carried out for WWF in 2008.

The international PEFC system was substantially modified with the changes introduced in 2010. Most importantly, the international standard for forest management which forms the basis for national PEFC standards is now set by PEFC itself and is no longer derived from political processes for defining criteria and indicators for forest management. This also leads to an approach which is now in line with the underlying concept for responsible forest management as defined by the principles in the FCAG.

Major changes were also introduced in the international standards regulating the development process of national standards which are now for their main parts much closer to the requirements of international reference documents as e.g. the ISEAL Code of Good Practice for Setting Social and Environmental Standards.

Still, deficits in compliance with the FCAG could be found in this study for the governance structures of the international PEFC system as well as for the requirements regulating the governance structures of national systems. Although changes were made since 2008 the rules and procedures established by PEFC are not conformant with FCAG requirements for this field.

No changes were made by PEFC for the activities of certification and accreditation. Therefore, requirements for credible forest certification in the FCAG, mainly the transparency of these activities as well as the stakeholder involvement in auditing and decision making processes are not fully reflected in the PEFC system.

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<sup>2</sup> The WWF/WB can be downloaded at:  
[http://wwf.panda.org/what\\_we\\_do/footprint/forestry/certification/which\\_system/](http://wwf.panda.org/what_we_do/footprint/forestry/certification/which_system/)

# 1 Introduction

## 1.1 Background

Certification of forest management is today a widespread tool developed with the aim to provide a credible guarantee to consumers on the environmental and social quality of forest management and of the products originating in certified forests. Today, 18% of the global forest area covered by management plans is certified by PEFC and/or FSC<sup>3</sup> and the certified forest area is still increasing.

Two international certification systems are competing in this field, the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification Systems and Schemes (PEFC). Although there is a tendency of increasing similarities of the two systems, differences in rules and procedures as well as in the overall organisational set-up of the two systems remain due to the history of FSC and PEFC but also due to the different target groups the two competitors intend to accommodate (Auld, G. et al. 2008).

In order to evaluate the credibility and comprehensiveness of different certification systems, WWF in close collaboration with the World Bank, developed the Forest Certification Assessment Guide (FCAG) as a tool for the analysis of forest certification systems. This document includes a number of principles for the organisational set-up of certification systems as well as for the content and rigour of forest management standards. The FCAG mirrors the core values of WWF, provides a framework to evaluate the credibility of the underlying rules and procedures, and finally, to come to judgments on the different claims made by certification systems.

In 2008 WWF commissioned a study with the aim to compare the two major certification systems on the basis of the FCAG requirements and thus, to provide a more substantiated judgment of the two systems (Walter 2008). Since, mainly the PEFC system was modified for a number of key elements with the last changes dating from November 2010. It is therefore the foremost objective of this study to analyse the recent changes of the PEFC system in order to verify if revised rules and procedures of the international system are now more aligned with FCAG concepts for responsible forest management. The direct comparison with the results obtained for the PEFC system in the 2008 analysis provides, in addition, information on the developments of the PEFC system with regard to the elements of the FCAG and

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<sup>3</sup> International Institute for Sustainable Development (IISD) Report 2010; [www.iisd.org/markets](http://www.iisd.org/markets)

indicates how and in which direction the PEFC system was developed by its constituencies.

## 1.2 Methodology

The analysis presented in this document is based on the Global Forest Alliance document 'Forest Certification Assessment Guide'. Reference is made in this guidance document to specific requirements in standards and guidelines of other institutions. The list of all documents used for the assessment is given in the list of references at the end of this report. The documents from the international PEFC system were publicly available from the website of PEFC ([www.pefc.org](http://www.pefc.org)). In this assessment it was not possible to use documents which are available only to PEFC membership or staff but which are not in the public domain. It is mentioned in a special note in the text to this FCAG requirement where this leads to insufficient possibilities to evaluate certain aspects of the FCAG.

In this report the findings are presented in one table. The respective clause and the document where corresponding text could be found in PEFC documentation are included in the tables. Limits of assessment or situations where the FCAG requirements could not clearly be related to PEFC procedures or requirements are described in comments and highlighted in italic letters in the text for each requirement. Main findings and conclusions are summarised at the end of the document. This section also includes more ample comments on some issues which were more difficult to assess.

On the background of the overall purpose of the study the different findings were classified into the following categories:

Fulfilled: content of documentation is adequately addressing the FCAG requirement.

Not fulfilled: the content of the documentation does not adequately address the FCAG requirement.

Not applicable (N.A.): this entry was chosen when the requirement cannot be fulfilled by the international PEFC system because it can e.g. only be addressed by national schemes.

In most cases this classification could be consistently applied. Given the wording of some FCAG requirements and the complexity of the assessed system documents intermediary situations for which findings could not be classified without doubt

were also encountered during analysis. The following entries were made in each of these situations:

- The system addresses the aspect but the wording in the documentation does not fully correspond to the meaning or intention of the FCAG requirement. In this case the findings were classified 'fulfilled' and an additional comment is explaining this classification.
- Some FCAG requirements include more than one aspect and the system complies with one but not with the other. In these cases the different parts were assessed separately and the findings were classified for each of the elements in the FCAG requirement.
- The issue is mentioned in the system's documentation but not elaborated with sufficient detail. The corresponding entry was 'not fulfilled' together with a brief comment explaining the judgment.

In an international system where basic requirements are centrally developed but where adaptation is allowed at national and sub-national levels the national schemes can for particular issues exceed the internationally set framework. Consequently, national schemes can conform to FCAG requirements where the international system does not. The study carried out in 2008 therefore included assessment of a number of national PEFC schemes in order to get information on the implementation of international framework standards in national schemes. The entry 'N.R.I.S. in the tables of the 2008 analysis means that the requirement is not met by the international system and corresponds to the entry 'not fulfilled' in the study presented here.

As most of the relevant changes of the international PEFC system are dated from November 2010 and applicable from 01<sup>st</sup> May 2011 they are not yet implemented or even included in documentation of national PEFC schemes. In the decentralised PEFC system modified international rules will be applicable for national schemes only once these are integrated into the documentation of the national PEFC schemes and the revisions at national level are endorsed by the PEFC Council. For the purpose of this study it is therefore not feasible to analyse national schemes in addition to the international system.

According to unconfirmed information the adaptation to the new international requirements has to be carried out in the normal revision process of national schemes which is due in a five year interval. National systems can work under the old PEFC requirements until the date of their currently valid endorsement. The last

national system will have to be in compliance with the new standards in 2016. As most systems have so far used the international PEFC chain of custody standard without modifications this standard will be applicable for all endorsed national systems from November 2011 onwards, the date specified by PEFC when the new CoC standard will enter into force.

## PART 1

### Compliance with international norms and standards

#### Criterion 1 — Compliance with international frameworks for certification, accreditation, and standard setting

Requirements	Assessment Results	Assessment Results 2008
a. The accreditation body is affiliated with an international accreditation organization (alliance/forum) such as the International Accreditation Forum (IAF; iaf.org) or the International Social and Environmental Accreditation and Labeling Alliance (ISEAL isealliance.org).	<b>Fulfilled</b> PEFC Technical document Certification and Accreditation Procedures (October 2007), Annex 6, point 5;	Fulfilled PEFC Technical document, Annex 6, point 5;
b. Monitoring and surveillance carried out by the organizations under point a cover the activities of accreditation in the field of forest management	<b>Fulfilled</b> The scope of IAF surveillance covers the PEFC activities of accreditation bodies.	Fulfilled
c. All certification bodies are accredited for their activities carried out for the forest management certification scheme under assessment.	<b>Fulfilled</b> PEFC Technical document Certification and Accreditation Procedures (October 2007), Annex 6, point 5;	Fulfilled (update October 2006) PEFC Technical document, Annex 6, point 4;
d. Accreditation requires compliance with ISO Guide 62 <sup>4</sup> , 65 <sup>5</sup> , or 66 <sup>6</sup>	<b>Fulfilled</b> PEFC Technical document Certification and Accreditation Procedures (October 2007), Annex 6, point 5; <i>Note: ISO Guides 62 and 66 were replaced by ISO standard ISO/IEC 17021:2006 (Conformity assessment -- Requirements for bodies providing audit and certification of management systems)</i>	Fulfilled PEFC Technical document, Annex 6, point 5;
e. Standard-setting bodies are affiliated with the ISEAL Alliance	<b>Not fulfilled</b>	<b>Not fulfilled</b>

<sup>4</sup> ISO/IEC Guide 62 (1996): General Requirements for Bodies Operating Assessment and Certification/Registration of Quality Systems, Geneva.

<sup>5</sup> ISO/IEC Guide 65 (1996): General Requirements for Bodies Operating Product Certification Systems, Geneva.

<sup>6</sup> ISO/IEC Guide 66 (1996): General Requirements for Bodies Operating Assessment and Certification/Registration of Environmental Management Systems, Geneva.

<b>Guidance</b>		
<p><b>Point a:</b> Affiliation with IAF or ISEAL should be as an accreditation or standard-setting body, respectively. Other forms of membership exist with these bodies but do not require compliance with relevant requirements (ISO 17011<sup>7</sup>, ISEAL Code of Good Practice for Setting Social and Environmental Standards<sup>8</sup>)</p>		
<p><b>Point b:</b> International bodies for mutual recognition of accreditation often limit their services to specific scopes, such as for quality management certification or environmental management certification. Monitoring and surveillance should therefore be evaluated if the activities of accreditation bodies in the field of forest management certification are in fact covered by international umbrella organizations.</p>		
<p><b>Point c:</b> It is important to assess that certification bodies are accredited for their activities in the field of forest management and carried out for the specific certification scheme. Accreditation for ISO 14001 or ISO 9000 is not sufficient.</p>		
<p><b>Point d:</b> Alternatively, a certification system can provide evidence of compliance with the above referenced documents (ISO 17011; ISO Guide 62, 65 and 66; and ISEAL Code of Good Practice) through other means. In this case the elements of the certification system have to be assessed against the requirements specified therein.</p>	<p>s. assessment of PEFC international standard setting procedures and requirements for national standard setting against the ISEAL Alliance Code of Good Practice in annexes 1 and 2</p>	
<p>Accreditation, certification, standardization</p>		

<sup>7</sup> ISO/IEC 17011:2004: Conformity Assessment — General Requirements for Accreditation Bodies Accrediting Conformity Assessment Bodies, Geneva.

<sup>8</sup> ISEAL Alliance (2004): ISEAL Code of Good Practice for Setting Social and Environmental Standards, Bonn.

## PART 2

### Standards and the Standard-Setting Process

Criterion 2 — Compatible with globally applicable principles that balance economic, ecological, and equity dimensions of forest management and meet Global Forest Alliance requirements

Requirements	Assessment Results	Assessment Results 2008
a. Compliance with all relevant laws. The scheme/system requires that forest management respect all applicable laws in the country in which operations occur and international treaties and agreements to which the country is signatory.	<b>Fulfilled</b> PEFC International Standard: Sustainable Forest Management – Requirements, PEFC ST 1003:2010, 5.7	<b>PEOLG:</b> Fulfilled PEFC Technical document, 4.6 and 4.7  <b>ATO/ITTO PC&amp;I:</b> Fulfilled ATO/ITTO PCI 2.1.1 and 2.1.2  <b>ITTO Guidelines:</b> <b>N.R.I.S.</b>
b. Respect for tenure and use rights. The scheme/ system requires respect for any legally documented or customary land tenure and use rights.	<b>Fulfilled</b> PEFC International Standard: Sustainable Forest Management – Requirements, PEFC ST 1003:2010, 5.6.3	<b>PEOLG:</b> Fulfilled PEOLG 6.1 b  <b>ATO/ITTO PC&amp;I:</b> Fulfilled ATO/ITTO PCI, 4.1  <b>ITTO Guidelines:</b> <b>N.R.I.S.</b>
c. Respect for indigenous peoples’ rights. The scheme/system explicitly requires respect for the legal and customary rights of indigenous people to own, use, and/or manage their lands, territories, and resources.	<b>Fulfilled</b> PEFC International Standard: Sustainable Forest Management – Requirements, PEFC ST 1003:2010, 5.6.4	<b>PEOLG:</b> <b>N.R.I.S.</b>  <b>ATO/ITTO PC&amp;I:</b> Fulfilled ATO/ITTO PCI, 4.1  <b>ITTO Guidelines:</b> <b>N.R.I.S.</b>
d. Respect for community relations. The scheme/system explicitly requires recognition and respect for the rights of communities as well as the maintenance and enhancement of the long-term social and economic well- being of forest communities.	<b>Fulfilled</b> PEFC International Standard: Sustainable Forest Management – Requirements, PEFC ST 1003:2010, 5.6.2 and 5.6.3	<b>PEOLG:</b> _Part 1: Fulfilled PEOLG 6.1 b <b>_Part 2: N.R.I.S.</b>  <b>ATO/ITTO PC&amp;I:</b> Fulfilled ATO/ITTO PCI, 4.2-4.4  <b>ITTO Guidelines:</b> <b>N.R.I.S.</b>

<p>e. Respect for workers' rights. The scheme/system explicitly requires recognition and respect for the rights of workers.</p>	<p><b>Fulfilled</b> PEFC International Standard: Sustainable Forest Management – Requirements, PEFC ST 1003:2010, 5.6.11-13</p>	<p><b>PEOLG:</b> Fulfilled PEOLG 6.1b</p> <p><b>ATO/ITTO PC&amp;I:</b> Fulfilled ATO/ITTO PCI, 4.1.3</p> <p><b>ITTO Guidelines:</b> <b>N.R.I.S.</b></p>
<p>f. Delivery of multiple benefits from the forest. The scheme/system explicitly requires management systems that encourage the efficient use of the multiple products and services of the forest to enhance economic viability and foster a wide range of environmental and social services.</p>	<p><b>Fulfilled</b> PEFC International Standard: Sustainable Forest Management – Requirements, PEFC ST 1003:2010, 5.6.1</p>	<p><b>PEOLG:</b> Fulfilled PEOLG 3.1c, 3.2a</p> <p><b>ATO/ITTO PC&amp;I:</b> Fulfilled ATO/ITTO PCI, 2.5, 3.5</p> <p><b>ITTO Guidelines:</b> _for plantations: Fulfilled _principle 27 _for natural forests: <b>N.R.I.S.</b></p>
<p>g. Assessment and mitigation of environmental impacts. The scheme/system explicitly requires that management systems assess and manage environmental impacts(including issues addressed in either World Bank or WWF policies) to conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes.</p>	<p><b>Fulfilled</b> PEFC International Standard: Sustainable Forest Management – Requirements, PEFC ST 1003:2010, 5.1.2</p>	<p><b>PEOLG:</b> Fulfilled PEOLG 2.1, 4.1b), 5.1 a)</p> <p><b>ATO/ITTO PC&amp;I:</b> Fulfilled ATO/ITTO PCI, 3.1-3.5</p> <p><b>ITTO Guidelines:</b> Fulfilled ITTO Guidelines plantations 4.1, ITTI Guidelines for natural forest management 3.1.7</p>
<p>h. Maintenance of critical forest areas and related natural critical habitats. The scheme/system explicitly requires that forest operations maintain critical forest areas and other critical natural habitats affected by the operation</p>	<p><b>Fulfilled</b> PEFC International Standard: Sustainable Forest Management – Requirements, PEFC ST 1003:2010, 5.4.2 <i>Note: although differences exist in the concept of 'critical forest areas' as defined in the World Bank policies and the terms used in the PEFC documents it can be assumed that the two approaches are widely overlapping and lead to similar effects on and outcomes for forest management</i></p>	<p><b>PEOLG:</b> <b>N.R.I.S.</b> The respective requirements in the PEOLG do not coincide with the concept and definition of critical forest areas and natural critical habitats as defined in the World Bank policies</p> <p><b>ATO/ITTO PC&amp;I:</b> Fulfilled ATO/ITTO PCI, 3.3.1, 3.3.2</p> <p><b>ITTO Guidelines:</b> <b>N.R.I.S.</b></p>
<p>i. Specific provisions for plantations. The scheme/system has adequate and explicit requirements to ensure that the establishment of plantations does not lead to the conversion of critical natural habitats.</p>	<p><b>Fulfilled</b> PEFC International Standard: Sustainable Forest Management – Requirements, PEFC ST 1003:2010, 5.1.11</p>	<p><b>PEOLG:</b> <b>N.R.I.S.</b></p> <p><b>ATO/ITTO PC&amp;I:</b> Fulfilled ATO/ITTO PCI, 3.2.2.1</p> <p><b>ITTO Guidelines:</b> _for natural forests: N.A. _for plantations: Fulfilled ITTO Guidelines plantations appendix 1</p>

<p>j. Implementation of management plan. The scheme/system requires effective forest management planning through the maintenance of a comprehensive and up-to-date management plan appropriate to the scale and intensity of the operation concerned. The scheme/system explicitly requires these management plans to have clearly articulated goals for continual improvement and descriptions of the means for achieving these goals.</p>	<p><b>Fulfilled</b> PEFC International Standard: Sustainable Forest Management – Requirements, PEFC ST 1003:2010, 5.1 and 5.1.2</p>	<p><b>PEOLG:</b> _Part 1: Fulfilled PEOLG,1.1c <b>_Part 2: N.R.I.S.</b></p> <p><b>ATO/ITTO PC&amp;I:</b> Fulfilled ATO/ITTO PCI, 2.2.3, 3.1.4</p> <p><b>ITTO Guidelines:</b> _for plantations: Fulfilled ITTO Guidelines plantations, 4.1 and 5.1.1 <b>_for natural forest management: N.R.I.S.</b></p>
<p>k. Effective monitoring and assessment. The scheme/ system explicitly requires the use of monitoring systems appropriate to the scale and intensity of the operation to assess the condition of the forest, yields of forest products, chain of custody (where relevant), management activities, and social and environmental impacts.</p>	<p><b>Fulfilled</b> PEFC International Standard: Sustainable Forest Management – Requirements, PEFC ST 1003:2010, 5.1.2, 5.1.7</p>	<p><b>PEOLG: N.R.I.S.</b> The PEOLG describe monitoring in general without specifying the more detailed issues included in the FCAG requirement</p> <p><b>ATO/ITTO PC&amp;I:</b> Fulfilled ATO/ITTO PCI, 2.6.1.1, 3.1.2</p>
<p><b>Guidance</b></p>		
<p><b>Points c and d:</b> Standards should require the protection of the rights of indigenous people and local communities where use is made of their cultural knowledge or of the biological diversity on which they traditionally depend. Reference should be made in the standard to the rights of indigenous people and local communities with respect to tenure, customary use, and sites of cultural or religious significance.</p>		
<p><b>Point e:</b> Standards should, at a minimum, meet the core International Labour Organization (ILO) requirements outlined in the Declaration on Fundamental Principles and Rights at Work</p>		
<p><b>Point k:</b> Standards should include the requirement that results of monitoring be taken into account during review of plans</p>		

### Criterion 3 — Meaningful and equitable participation of all major stakeholder groups in governance and standard setting

Comment: The set of elements included in this section refers to standard setting procedures and governance of the PEFC system. Both aspects have an international and a national component. The assessment is therefore carried out separately for these different parts of the PEFC system. As the focus of this study is on the international PEFC system it is analyzed here which requirements are set for national schemes in the fields of standard setting and governance. This chapter therefore is structured in four parts a) to d) given below. The key documents of the PEFC international system used for analysis are indicated in brackets. The parts under a) and b) related to standard setting are in addition to the FCAG requirements also analyzed against the ISEAL Code of Good Practice as compliance with this reference document is not covered through a membership of PEFC in the ISEAL organization. Results of this analysis are given in annexes 2 and 3.

- a) Rules for the development of international standards (PEFC Council technical documents development procedures – requirements; PEFC GD 1003:2009, Issue 1')
- b) Rules for the development of national standards (PEFC International Standard - Requirements for certification schemes PEFC ST 1001:2010)
- c) Rules for the governance of the international system (PEFC Council Statutes)
- d) Rules of the international system for the governance of national systems

As for all aspects which do not exclusively relate to the international level the provisions set by the international system could be supplemented by those set by national systems. As the newly introduced international standards and system requirements are not yet transferred to national systems it is at this stage not possible to evaluate if national systems comply with FCAG requirements although the international system does not include relevant rules.

a) Rules for development of international standards

Requirements	Assessment Results 2010	<i>Note: In 2008 the international PEFC standards were not developed by the organization but were taken over from political processes for development of criteria and indicators</i>
Effective stakeholder involvement		
<p>a. Relevant stakeholder groups (see annex 2 checklist) have been officially invited to participate.</p>	<p><b>Not fulfilled</b>  <i>Section 4.5 describes the composition and the nomination process for working groups responsible for the development of international standards. The document does not mention specific stakeholder groups which are to be invited for participation in those working groups. However, the document requires balanced participation but does not further explain this term. Given the few requirements for defining composition of working groups it cannot be ensured by these procedures that the 'relevant stakeholder groups' are represented in working groups responsible for standard development at international level.</i></p>	
<p>b. Relevant stakeholder groups (see annex 2 checklist) participated meaningfully</p>	<p><b>N.A.</b>  <i>The expected involvement of stakeholders in standard development is not further specified in PEFC documents. However, the actual level of participation cannot be derived from publicly available documents alone but needed to be evaluated through meeting protocols or interviews what is outside the scope of this study.</i></p>	
<p>c. A procedure is in place to involve stakeholders in case of failure to achieve meaningful participation of relevant major stakeholder groups.</p>	<p><b>Not fulfilled</b></p>	
<p>d. Written documents are available on what efforts have been taken to include stakeholders as well as on how issues raised by stakeholders have been addressed.</p>	<p><b>Not fulfilled</b>  <i>The system documentation does not require that records are kept on those efforts. If such documents exist which are not available in the public domain cannot be evaluated in the scope of this study.</i></p>	

Balanced decision-making procedures		
<p>e. The decision-making process is striving for consensus among relevant stakeholder groups.</p>	<p><b>Not fulfilled</b>  <i>The PEFC guide 'PEFC Council technical documents development procedures – requirements; PEFC GD 1003:2009, Issue 1' broadly describes the procedures necessary for building consensus but does not define that the overall process has to encompass the interests of the 'relevant stakeholder groups' as minimum requirements for the composition of working groups for standard setting at international level are not laid out in relevant PEFC documents.</i></p>	
<p>f. Procedures are in place to achieve balanced decision making in the absence of consensus. These procedures do the following:</p>	<p>s. below</p>	
<p>o Ensure that no major interest group can dominate nor be dominated in the decision-making process.</p>	<p><b>Not Fulfilled</b>  PEFC Council technical documents development procedures – requirements; PEFC GD 1003:2009, Issue 1, 5.4.2  <i>Note: The document does not explicitly require participation of 'major interest groups' in the working groups established for standard development.</i></p>	
<p>o Specify a voting system that prevents major environmental, social, or economic interests from being overruled.</p>	<p><b>Not fulfilled</b>  PEFC Council technical documents development procedures – requirements; PEFC GD 1003:2009, Issue 1, 5.4.2  <i>Comments on assessment: s. above</i></p>	
<p>o Contain a mechanism that prevents decision making in the absence of any representative of one of the major interest groups</p>	<p><b>Not fulfilled</b></p>	

<b>Guidance</b>		
<p><b>Point a:</b> Definition of the two terms relevant stakeholder groups and major interest groups:</p>		
<p>The following relevant stakeholder groups should be represented in the standard-setting process and in the governance of the scheme/system:</p> <ul style="list-style-type: none"> <li>○ Forest owners, including governments, and/or representatives of their associations</li> <li>○ Product manufacturers, distributors, retailers</li> <li>○ Scientists/scientific bodies</li> <li>○ Environmental NGOs, Social NGOs/organizations (e.g., worker unions and consumer associations)</li> <li>○ Representatives of indigenous peoples</li> </ul>		
<p>Major interest groups are divided into economic, social, and ecological interests and are relevant for decision making in the absence of consensus</p>		
<p><b>Point b:</b> NGOs participating in standard setting and governance should</p> <ul style="list-style-type: none"> <li>○ Legitimately represent the respective interests</li> <li>○ Ensure that representatives are accountable to their constituencies</li> <li>○ Have a proven record in the subject matter</li> <li>○ Be interested and affected by the certification system</li> <li>○ Have a broad membership base</li> </ul>		
<p>Governance, standard setting</p>		

b) Rules for the development of national standards

Requirements	Assessment Results 2010	Assessment Results 2008
<b>Effective stakeholder involvement</b>		
a. Relevant stakeholder groups (see annex 2 checklist) have been officially invited to participate.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 4.4	Fulfilled PEFC Technical Document , Annex 2, 3.5.1
b. Relevant stakeholder groups (see annex 2 checklist) participated meaningfully	<b>N.A.</b> <i>The expected level of participation is not further specified in PEFC documentation. This also applies to national level implementation of international standards what is outside the scope of this study.</i>	<b>N.R.I.S</b>
c. A procedure is in place to involve stakeholders in case of failure to achieve meaningful participation of relevant major stakeholder groups.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010,5.1 and 5.2	<b>N.R.I.S.</b>
d. Written documents are available on what efforts have been taken to include stakeholders as well as on how issues raised by stakeholders have been addressed.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 4.1 b), 4.3	Fulfilled PEFC Technical document , annex 2, 3.5.1
<b>Balanced decision-making procedures</b>		
e. The decision-making process is striving for consensus among relevant stakeholder groups.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.8	<b>N.R.I.S.</b> PEFC Technical Document , Annex 2, 4.3.1 Consensus does not have to be achieved among the below mentioned stakeholder groups.
f. Procedures are in place to achieve balanced decision making in the absence of consensus. These procedures do the following:	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.8	N.A. PEFC only allows consensus based decisions. No voting mechanism is therefore defined.
o Ensure that no major interest group can dominate nor be dominated in the decision-making process.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.8	N.A. s. above

<ul style="list-style-type: none"> <li>Specify a voting system that prevents major environmental, social, or economic interests from being overruled.</li> </ul>	<p><b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.8</p>	<p>N.A. s. above</p>
<ul style="list-style-type: none"> <li>Contain a mechanism that prevents decision making in the absence of any representative of one of the major interest groups</li> </ul>	<p><b>Not fulfilled</b> <i>PEFC procedures do not include a mechanism for dealing with situations where 'key stakeholders' or 'major interest groups are absent from the decision making process.</i></p>	<p>N.A.</p>
<p><b>Guidance</b></p>		
<p><b>Point a:</b> Definition of the two terms relevant stakeholder groups and major interest groups:</p>		
<p>The following relevant stakeholder groups should be represented in the standard-setting process and in the governance of the scheme/system:</p> <ul style="list-style-type: none"> <li>Forest owners, including governments, and/or representatives of their associations</li> <li>Product manufacturers, distributors, retailers</li> <li>Scientists/scientific bodies</li> <li>Environmental NGOs, Social NGOs/organizations (e.g., worker unions and consumer associations)</li> <li>Representatives of indigenous peoples</li> </ul>		
<p>Major interest groups are divided into economic, social, and ecological interests and are relevant for decision making in the absence of consensus</p>		
<p><b>Point b:</b> NGOs participating in standard setting and governance should</p> <ul style="list-style-type: none"> <li>Legitimately represent the respective interests</li> <li>Ensure that representatives are accountable to their constituencies</li> <li>Have a proven record in the subject matter</li> <li>Be interested and affected by the certification system</li> <li>Have a broad membership base</li> </ul>		
<p>Governance, standard setting</p>		

c) Rules for the governance of the international system

Requirements	Assessment results 2010	Assessment Results 2008
<b>Effective stakeholder involvement</b>		
a. Relevant stakeholder groups (see annex 2 checklist) have been officially invited to participate.	<p><b>Fulfilled</b></p> <p><i>Note: in 2009 PEFC established the stakeholder forum to allow for a broader membership base. The stakeholder forum is open to international organizations. Although there is no formal invitation available in public documentation it can be assumed that relevant stakeholders have been made aware of this possibility and are informed about their opportunities for participation.</i></p>	<b>Not fulfilled</b>
b. Relevant stakeholder groups (see annex 2 checklist) participated meaningfully	<p><b>Not fulfilled</b></p> <p><i>Note: as of January 2011 two international companies and various associations are members of the stakeholder forum (<a href="http://www.pefc.org/about-pefc/membership/international-stakeholders">http://www.pefc.org/about-pefc/membership/international-stakeholders</a>). From the relevant stakeholder groups listed in the guidance note to this section, representatives of indigenous people and of social and environmental interests do not participate in this forum.</i></p>	<b>Not fulfilled</b>
c. A procedure is in place to involve stakeholders in case of failure to achieve meaningful participation of relevant major stakeholder groups.	<p><b>Not Fulfilled</b></p> <p><i>Note: There is no formal procedure available in PEFC documentation for proactively seeking involvement of stakeholders</i></p>	<b>Not fulfilled</b>
d. Written documents are available on what efforts have been taken to include stakeholders as well as on how issues raised by stakeholders have been addressed.	<p><b>Not fulfilled</b></p> <p><i>Note: the system documentation does not require that records are kept on those efforts. If such documents are available to the PEFC Secretariat which are not published is not considered in this study.</i></p>	<b>Not fulfilled</b>

<b>Balanced decision-making procedures</b>		
e. The decision-making process is striving for consensus among relevant stakeholder groups.	<b>Not fulfilled</b> <i>Note: The governance structures and procedures of the PEFC General Assembly are based on a voting system which does not foresee consensus.</i>	<b>Not fulfilled</b>
f. Procedures are in place to achieve balanced decision making in the absence of consensus. These procedures do the following:		
o Ensure that no major interest group can dominate nor be dominated in the decision-making process.	<b>Not fulfilled</b>	<b>Not fulfilled</b>
o Specify a voting system that prevents major environmental, social, or economic interests from being overruled.	<b>Not fulfilled</b>	<b>Not fulfilled</b>
o Contain a mechanism that prevents decision making in the absence of any representative of one of the major interest groups	<b>Not fulfilled</b>	<b>Not fulfilled</b>
<b>Guidance</b>		
<b>Point a:</b> Definition of the two terms relevant stakeholder groups and major interest groups:		
The following relevant stakeholder groups should be represented in the standard-setting process and in the governance of the scheme/system:  o Forest owners, including governments, and/or representatives of their associations o Product manufacturers, distributors, retailers o Scientists/scientific bodies o Environmental NGOs, Social NGOs/organizations (e.g., worker unions and consumer associations) o Representatives of indigenous peoples		

<p>Major interest groups are divided into economic, social, and ecological interests and are relevant for decision making in the absence of consensus</p>		
<p><b>Point b:</b> NGOs participating in standard setting and governance should</p> <ul style="list-style-type: none"> <li>○ Legitimately represent the respective interests</li> <li>○ Ensure that representatives are accountable to their constituencies</li> <li>○ Have a proven record in the subject matter</li> <li>○ Be interested and affected by the certification system</li> <li>○ Have a broad membership base</li> </ul>		
<p>Governance, standard setting</p>		

d) Rules of the international system for the governance of national systems

Requirements	Assessment Results 2010	Assessment Results 2008
<b>Effective stakeholder involvement</b>		
a. Relevant stakeholder groups (see annex 2 checklist) have been officially invited to participate.	<b>Fulfilled</b> PEFC Council Technical document, October 2007	<b>N.R.I.S.</b> PEFC only requires the participation of forest owners
b. Relevant stakeholder groups (see annex 2 checklist) participated meaningfully	<b>Not fulfilled</b> <i>The level of actual participation is not further specified in PEFC international procedures</i>	<b>N.R.I.S.</b>
c. A procedure is in place to involve stakeholders in case of failure to achieve meaningful participation of relevant major stakeholder groups.	<b>Not fulfilled</b>	<b>N.R.I.S.</b>
d. Written documents are available on what efforts have been taken to include stakeholders as well as on how issues raised by stakeholders have been addressed.	<b>Not fulfilled</b>	<b>N.R.I.S.</b>
<b>Balanced decision-making procedures</b>		
e. The decision-making process is striving for consensus among relevant stakeholder groups.	<b>Not fulfilled</b>	<b>N.R.I.S.</b>
f. Procedures are in place to achieve balanced decision making in the absence of consensus. These procedures do the following:		
o Ensure that no major interest group can dominate nor be dominated in the decision-making process.	<b>Not fulfilled</b>	<b>N.R.I.S.</b>
o Specify a voting system that prevents major environmental, social, or economic interests from being overruled.	<b>Not fulfilled</b>	<b>N.R.I.S.</b>

<ul style="list-style-type: none"> <li>○ Contain a mechanism that prevents decision making in the absence of any representative of one of the major interest groups</li> </ul>	<p><b>Not fulfilled</b></p>	<p><b>N.R.I.S.</b></p>
<p><b>Guidance</b></p>		
<p>Point a—Definition of the two terms relevant stakeholder groups and major interest groups:</p>		
<p>The following relevant stakeholder groups should be represented in the standard-setting process and in the governance of the scheme/system:</p> <ul style="list-style-type: none"> <li>○ Forest owners, including governments, and/or representatives of their associations</li> <li>○ Product manufacturers, distributors, retailers</li> <li>○ Scientists/scientific bodies</li> <li>○ Environmental NGOs, Social NGOs/organizations (e.g., worker unions and consumer associations)</li> <li>○ Representatives of indigenous peoples</li> </ul>		
<p>Major interest groups are divided into economic, social, and ecological interests and are relevant for decision making in the absence of consensus</p>		
<p><b>Point b:</b> NGOs participating in standard setting and governance should</p> <ul style="list-style-type: none"> <li>○ Legitimately represent the respective interests</li> <li>○ Ensure that representatives are accountable to their constituencies</li> <li>○ Have a proven record in the subject matter</li> <li>○ Be interested and affected by the certification system</li> <li>○ Have a broad membership base</li> </ul>		
<p>Governance, standard setting</p>		

## Criterion 4 — Avoidance of unnecessary obstacles to trade

No criteria specified

## Criterion 5 — Based on objective and measurable performance standards that are adapted to local conditions

Requirements	Assessment Results 2010	Assessment Results 2008
a. The standard contains explicit performance requirements, including chain of custody, if relevant.	<b>Fulfilled</b> PEFC International Standard: Sustainable Forest Management – Requirements, PEFC ST 1003:2010	Fulfilled PEOLG
b. The standard is written in measurable terms, with guidance on interpretation if flexibility is required.	<b>Fulfilled</b> PEFC International Standard: Sustainable Forest Management – Requirements, PEFC ST 1003:2010	N.A. at international level
c. International principles and criteria used as the basis for development of national standards include provisions for the operational level (forest management unit).	<b>Fulfilled</b> PEFC International Standard: Sustainable Forest Management – Requirements, PEFC ST 1003:2010	Fulfilled PEOLG
In case of internationally operating systems:		
d. Mechanisms and processes are in place to facilitate the harmonization/equivalence of national standards or national schemes within the international system.	<b>Fulfilled</b> PEFC Technical document, Annex 7, Endorsement and Mutual Recognition of National Schemes and their Revision, October 2007	Fulfilled
e. Processes exist by which consistency between national standards can be sought.	<b>Fulfilled</b> PEFC Technical document, Annex 7, Endorsement and Mutual Recognition of National Schemes and their Revision, October 2007	Fulfilled
f. National standards are endorsed by the	<b>Fulfilled</b>	Fulfilled

international system.	PEFC Technical document, Annex 7, Endorsement and Mutual Recognition of National Schemes and their Revision, October 20007	PEFC Technical document, annex 7
<b>Guidance</b>		
Although the national standard may include requirements for the management systems in place, the Global Forest Alliance requirements should be translated into performance indicators that are applicable at the national or sub-national level. Wording of the indicators should prevent ambiguities and potentially inconsistent interpretation by avoiding terms such as “where applicable” or “where appropriate” without explanations for interpretation.		N.A at international level
Governance, standard setting		

## PART 3

### Conformity Assessment, Certification, and Accreditation

#### Criterion 6 — Certification decisions free of conflicts of interest from parties with vested interests

Given the detailed provisions for these elements in the relevant ISO documents, evidence of a scheme's compliance with ISO rules (i.e., monitoring mechanisms are in place) ensures the independence of the assessment and the absence of conflicts of interest in a scheme's certification decision-making process. Therefore no additional guidance is needed for evaluating compliance of a scheme with criterion 6.

#### Criterion 7 — Transparency in decision making and public reporting

##### 7.1 Public availability of scheme requirements

Requirements	Assessment Results 2010	Assessment Results 2008
In addition to the above, the certification scheme/system makes its documents publicly available, specifying all its requirements related to accreditation, standardization, and certification, including chain of custody and control of claims, where applicable.	<b>Fulfilled</b> PEFC standards are in their entirety available from the PEFC website	Fulfilled PEFC Technical document with annexes
<b>Guidance</b>		
Certification schemes frequently specify regulations for certification and accreditation, normally requiring ISO compliance or exceeding ISO rules. All these scheme-specific rules have to be publicly available.		
Scheme governance		

## 7.2 Public availability of certification and accreditation reports

Requirements	Assessment Results 2010	Assessment Results 2008
a. Public reports on forest management evaluation and surveillance provide the rationale for the certification decision or the maintenance of certification, respectively.	<b>Fulfilled</b> PEFC Technical Document, Annex 6, Certification and Accreditation Procedures, October 2007, 4 <b>Not fulfilled for surveillance</b>	<b>N.R.I.S. for surveillance</b>
b. Public reports on forest management evaluation justify the certification decision by providing key findings with respect to compliance with the standard.	<b>Fulfilled</b> PEFC Technical Document, Annex 6, Certification and Accreditation Procedures, October 2007, 4	Fulfilled PEFC Technical document, annex 6, 4
c. Public reports on forest management evaluation and surveillance include the corrective action requests raised in regard to the performance of the operation being evaluated.	<b>Not fulfilled</b>	<b>N.R.I.S.</b>
d. Public reports on accreditation provide the rationale for the accreditation decision.	<b>Not fulfilled</b>	<b>N.R.I.S.</b>
e. Public reports on accreditation provide the corrective action requests raised in regard to the performance of the evaluated certification body.	<b>Not fulfilled</b>	<b>N.R.I.S.</b>
f. Public reports are readily available.	<b>Not fulfilled</b>	<b>N.R.I.S.</b>
<b>Guidance</b>		
<b>Point c:</b> The main strengths of the assessed operation should be summarized in the public report and provide the evidence for standard compliance.		
<b>Point f:</b> Public reports should be available from the Web sites of certification and accreditation bodies. Otherwise they should be sent to any interested party at no charge and without delay.		
Accreditation, certification		

## Criterion 8 — Reliable and independent assessment of forest management performance and chain of custody

### 8.1 Independence of assessments

No criteria specified

### 8.2 Field evaluation of forest management and certification body performance

Requirements	Assessment Results 2010	Assessment Results 2008
a. Accreditation procedures for the initial evaluation and surveillance of certification bodies foresee field visits to certified forest management units.	<b>Not fulfilled</b> <i>Note: Accreditation in the PEFC system has to be in compliance with ISO standard 17011. There is no explicit requirement in this standard that forest management units have to be part of the accreditation body's assessment and surveillance program.</i>	<b>N.R.I.S.</b>
b. Accreditation requirements specify evaluation and surveillance intensity to be applied by certification bodies.	<b>Fulfilled</b> PEFC Technical document, annex 6, 4	<b>N.R.I.S.</b>
c. Certification procedures require field visits to applicant forest management units before a certificate can be issued.	<b>Not fulfilled</b> <i>No related requirement could be found in PEFC documentation</i>	<b>N.R.I.S.</b>
<b>Guidance</b>		
According to ISO rules, accreditation and certification bodies have to make the applied assessment methodology and surveillance intensity publicly available. Information about the documented procedures can therefore be obtained from these bodies.		

Accreditation, certification		
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### 8.3 Chain-of-custody requirements

Requirements	Assessment Results 2010	Assessment Results 2008
a. The scheme has a standard for the control of chain of custody that covers production and trade from the forest of origin to the final product.	<b>Fulfilled</b> Chain of Custody of Forest Based Products - Requirements: PEFC ST 2002:2010	Fulfilled  PEFC Technical document, annex 4, 1.1
b. Standards and control mechanisms exist to prevent application of logos on uncertified timber.	<b>Fulfilled</b> Chain of Custody of Forest Based Products - Requirements: PEFC ST 2002:2010	Fulfilled PEFC Technical document, annex 4 and 5
c. Chain-of-custody certificate holders are required to exclude timber from illegal sources and from conversion of forests.	<b>Fulfilled</b> Chain of Custody of Forest Based Products - Requirements: PEFC ST 2002:2010, 5.6  <i>Note: The PEFC chain of custody standard only excludes conversion to forest plantations but allows conversion to other land use if legally conducted.</i>	<u>Part 1:</u> Fulfilled PEFC Technical document, annex 4, 1.3.4 and 3.6  <b>Part 2: N.R.I.S.</b>
d. Procedures for use of claims comply with ISO standards 14020 <sup>9</sup> and 14021 <sup>10</sup> .	<b>Fulfilled</b> Chain of Custody of Forest Based Products - Requirements: PEFC ST 2002:2010, 1	s. special section below
<b>Guidance</b>		
None		
Scheme governance		

<sup>9</sup> ISO/IEC 2000: ISO standard 14020 - Environmental labels and declarations — General principles

<sup>10</sup> ISO/IEC 1999: ISO standard 14021 - Environmental labels and declarations – Self-declared environmental claims (Type II environmental labelling)

#### 8.4 Stakeholder consultation in the certification and accreditation process

Requirements	Assessment Results 2010	Assessment Results 2008
a. Accreditation bodies undertake proactive and culturally appropriate external consultation as part of initial assessment and surveillance of certification bodies.	<b>Not fulfilled</b>	<b>N.R.I.S.</b>
b. Certification bodies undertake proactive and culturally appropriate external consultation as part of initial assessment and surveillance of certificate holders.	<b>Not fulfilled</b> <i>No related requirement could be found in PEFC documentation</i>	<b>N.R.I.S.</b>
c. Appropriate procedures exist to take stakeholders' comments into account in the decision-making process for certification and accreditation.	<b>For accreditation: Not fulfilled</b> <b>For certification fulfilled</b>  <i>Note: the rules set by the international system for involvement of stakeholder comments are comparably weak.</i>	<b>For accreditation: N.R.I.S.</b> PEFC Technical document, annex 6, 4  For certification: Fulfilled
<b>Guidance</b>		
<b>Points a and b:</b> Time and place of initial evaluation and surveillance audits should be made known to stakeholders, together with an invitation to provide comments about the assessed operation to the certification or accreditation body.		
<b>Point c:</b> The certification decision-making committee within the certification or accreditation body should be required to take note of stakeholder comments and to justify its decision accordingly in the public report. The groups to be consulted must correspond to the groups as outlined in criterion 6.		
Accreditation, certification		

## 8.5 Complaints and appeals mechanisms

Comment: The requirements in this section apply to three parts of certification systems, namely the standard setting, certification and accreditation procedures. Analysis is therefore done separately for each of these activities.

### a) Standard setting

Requirements	Assessment Results 2010	Assessment Results 2008
Complaints and appeals mechanisms of accreditation, certification, and standard-setting bodies are :		
a. accessible to any interested party,	<b>Fulfilled</b> PEFC Council technical documents development procedures - requirements PEFC GD 1003:2009, Issue 1	Fulfilled Technical documents, annex 2, 3.5.1
b. publicly available, and	<b>Fulfilled</b> PEFC Council technical documents development procedures - requirements PEFC GD 1003:2009, Issue 1	Fulfilled Technical documents, annex 2, 3.5.1
c. free of cost implications for the complainant	<b>Not fulfilled</b> <i>Note: the entry 'not fulfilled' was made because no rule could be found in the PEFC documentation. This does not necessarily mean that costs for dealing with complaints are in fact charged to the complainants.</i>	<b>N.R.I.S.</b>
<b>Guidance</b>		
This point implies that anybody who wishes to do so can raise a complaint against decisions taken by accreditation, certification, and standard-setting bodies. Relevant documentation can normally be found in the documents on complaints and appeals procedures of certification, accreditation, and standard-setting bodies, which have to be published under ISO and ISEAL rules.		
Standard setting, accreditation, certification		

b) Certification

Requirements	Assessment Results 2010	Assessment Results 2008
Complaints and appeals mechanisms of accreditation, certification, and standard-setting bodies are		
a. accessible to any interested party,	<b>Fulfilled</b> Required through ISO standards for certification	Required through ISO Guides, eg. ISO Guide 65, 7.1
b. publicly available, and	<b>Fulfilled</b> Required through ISO standards for certification	Fulfilled Required through ISO Guides, eg. ISO Guide 65, 7.1
c. free of cost implications for the complainant	<b>Not fulfilled</b> <i>Note: the entry 'not fulfilled' was made because no rule could be found in the PEFC documentation. This does not necessarily mean that costs for dealing with complaints are in fact charged to the complainants.</i>	<b>N.R.I.S.</b>
<b>Guidance</b>		
This point implies that anybody who wishes to do so can raise a complaint against decisions taken by accreditation, certification, and standard-setting bodies. Relevant documentation can normally be found in the documents on complaints and appeals procedures of certification, accreditation, and standard-setting bodies, which have to be published under ISO and ISEAL rules.		

c) Accreditation

Requirements	Assessment Results 2010	Assessment Results 2008
Complaints and appeals mechanisms of accreditation, certification, and standard-setting bodies are		
a. accessible to any interested party,	<b>Fulfilled</b> Required through ISO standards for accreditation	Fulfilled ISO 17011, 5.9
b. publicly available, and	<b>Fulfilled</b> Required through ISO standards for accreditation	Fulfilled ISO 17011, 5.9
c. free of cost implications for the complainant	<b>Not fulfilled</b> <i>Note: the entry 'not fulfilled' was made because no rule could be found in the PEFC documentation. This does not necessarily mean that costs for dealing with complaints are in fact charged to the complainants.</i>	<b>N.R.I.S.</b>
<b>Guidance</b>		
This point implies that anybody who wishes to do so can raise a complaint against decisions taken by accreditation, certification, and standard-setting bodies. Relevant documentation can normally be found in the documents on complaints and appeals procedures of certification, accreditation, and standard-setting bodies, which have to be published under ISO and ISEAL rules.		

## Criterion 9 — Delivers continual improvement in forest management

Requirements		Assessment Results
a. The scheme sets deadlines for full compliance if certificates are issued under the condition of fulfillment of outstanding non-compliances.	<p><b>Not fulfilled</b>  <i>No related requirement could be found in PEFC documentation.</i></p>	<p><b>N.R.I.S.</b></p>
b. Surveillance visits from certification bodies and accreditation bodies are carried out at least annually.	<p><b>_For certification: Fulfilled</b>            PEFC Technical document, annex 6, 4</p> <p><b>_For accreditation: Not fulfilled</b></p>	<p><b>_For certification: fulfilled</b>            PEFC Technical document, annex 6, 4</p> <p><b>_For accreditation: N.R.I.S.</b></p>
c. Clear deadlines exist for compliance, with corrective action requests issued as a result of surveillance.	<p><b>Not fulfilled</b></p>	<p><b>N.R.I.S.</b></p>
<b>Guidance</b>		
<p><b>Point a:</b>            Normally, deadlines specified for full compliance of certificate holders with all standard requirements should not exceed two years.</p>		
<p><b>Point b:</b>            The minimum requirement of most certification schemes is an annual visit by certification bodies to certificate holders and by accreditation organizations to certification bodies. In high-risk areas and in cases of complaints, a more frequent schedule of visits should be foreseen.</p>		
<p><b>Point c:</b>            Deadlines set for compliance with corrective action requests should not exceed six months.</p>		
Certification, accreditation		

## Criterion 10 — Accessible to and cost-effective for all parties

Requirements	Assessment results 2010	Assessment Results 2008
a. Mechanisms exist that allow equity of access to all participants, regardless of the size, location, or forest type under the operation's management.	<b>_For location: Not fulfilled</b> <i>The PEFC system is only applicable in countries with an approved system.</i>	<b>_For location: Not fulfilled</b>  _For size and forest type: Fulfilled PEFC Technical document, annex 3, 4.1 a, b
b. The above mechanisms provide access to forest certification at a cost that does not exclude small forest owners, communities, and other groups that may have limited access.	<b>Fulfilled</b>	Fulfilled
<b>Guidance</b>		
Provisions for better access to certification for owners of small forest areas can be made at two levels:		
a. On the level of accreditation, by reducing evaluation intensity, e.g., in the framework of group certification or multi-site certification.		
b. On the level of standards, by reducing performance levels or waiving compliance with certain standard requirements for this group.		
Compliance can normally be assumed when these forest owners participate in the scheme. Information may be obtained from the list of certificate holders published by the certification bodies according to ISO rules. However, the possibility that substantial subsidies are provided to these groups should be considered for the evaluation of the accessibility of the schemes for this forest owner group. The notion of the area that is considered as small may vary from region to region, depending on the traditional forest ownership structures. A definition should therefore be developed in the context of the national standard-setting process.		

## Criterion 11 — Voluntary participation

Requirements		Assessment Results
<p>a. In cases of group certification, a set of contractual arrangements exists between the owners or their designated intermediary and the entity that holds the group certificate for the requirements of certification.</p>	<p><b>Fulfilled</b> Group Forest Management Certification - Requirements Document title: PEFC ST 1002:2010, 4.2 e)</p>	<p><b>N.R.I.S.</b></p>
<p>b. A mechanism exists to ensure that each member of the group must meet the standard or will have to leave the group.</p>	<p><b>Not fulfilled</b> <i>The expulsion of participants in group scheme is not clearly specified in PEFC documentation</i></p>	<p><b>N.R.I.S.</b></p>
<p>c. Enforcement mechanisms exist in case of breach of the group's rules.</p>	<p><b>Not fulfilled</b> <i>Enforcement mechanisms are not clearly defined in PEFC documentation</i></p>	<p><b>N.R.I.S.</b></p>
<p>d. All participating forest owners have signed a commitment to adhere to the standards set by the scheme.</p>	<p><b>Fulfilled</b> Group Forest Management Certification - Requirements Document title: PEFC ST 1002:2010, 4.2 a)</p>	<p><b>N.R.I.S.</b></p>
<p><b>Guidance</b></p>		
<p><b>Point a:</b> The contractual relationship between the group member and the entity that holds the group certificate should foresee that members can be removed from the group in case of unresolved corrective action requests.</p>		
<p>Accreditation, certification</p>		

## Summary analysis of findings for the international PEFC system

### General aspects

In the PEFC system a number of functions are decentralized either to national schemes endorsed by PEFC or to national accreditation organizations which control the work of certification bodies. Responsibilities of the international PEFC council are mainly related to standard setting and to the provision of a framework which allows the endorsement of national schemes. In comparison to the rules and procedures applicable in 2008 when the first analysis of the PEFC system was carried out the revised system is closer to the expectations for certification systems as embedded in the FCAG principles and requirements. Still, implementation of the revised system requirements is under the auspices of the national schemes and it is not clearly identifiable in the documentation of the PEFC international system from what date onwards the revised PEFC rules will have to be implemented at national level. If implementation is due at the regular revision of national PEFC schemes which take place in five year intervals the last system will be in line with the updated requirements in 2016.

### Part 1: Compliance with International Norms and Standards

The PEFC system is closely linked to international norms set by different bodies. Adherence of accreditation and certification bodies to relevant ISO norms is required by the international system. The PEFC rules for standard setting bodies are based on ISO Guide 59. It is intended in the PEFC system that national standard setting bodies also adhere to the ISEAL Code of Good Practice for Setting Social and Environmental Standards although PEFC international is not a member of this organization. Analysis shows that PEFC requirements for international standards and the requirements set by the international system for standard setting at national level are for most issues in compliance with ISEAL guidance. There are some administrative rules in the ISEAL document which are not fully addressed in the PEFC system but in general terms it can be concluded that the standard setting procedures are coherent to the international framework standards and guides mentioned in the FCAG.

### Part 2: Standards and the Standard-Setting Process

The most fundamental changes in the PEFC system refer to the role of the organization for setting an international framework standard applicable at forest management unit level to which the national schemes are bound in their definition of appropriate and locally adapted requirements. Until 2010 the PEFC system was based on the outcome of political processes established for national government reporting in the aftermath of the UNCED in 1992 and did not on its own have the structures and the mandate from its constituencies to develop an international framework standard. In the new framework

the principles and foremost the different requirements for FMU level application are now developed by the PEFC itself. This certainly allows for better coherence and comparability between national schemes. It can also be concluded from the analysis that the international framework standard is now in line with all elements deemed essential for sustainable forest management in the FCAG.

In the assessment carried out in 2008 one key deficit of the PEFC system was related to the possibilities of stakeholders to influence the development and approval process for standards as well as the decision-making in the governance structures of the international system. The evaluation presented in this study looked at four elements of the PEFC system namely the procedures for development of international standards, the rules for development of national standards, possibilities of stakeholder involvement in the international system and the rules set internationally for stakeholder involvement in national schemes.

The procedures for setting international standards provide for a participation of stakeholders in working groups which report to the PEFC Board of Directors and finally to the PEFC General Assembly which is the body responsible for approving international standards. Participation in working groups is open to any interested party but at international level no detailed requirements exist which stakeholders need to participate in order to have all relevant interests included in the development process. Therefore, PEFC is still not fully compliant with the respective FCAG ideas on effective stakeholder involvement in the development process for international forest management standards.

The rules set by the international system for national level standard development are more rigid and provide for more clarity with regard to the necessary level of stakeholder participation. Moreover, the possibilities for participation and the different groups which need to be involved are more comprehensively described and defined. PEFC requires that key stakeholders are represented in the working groups at national level and relies for the definition to the stakeholder groups on the Agenda 21 of the United Nations Conference on Environment and Development (UNCED) in Rio de Janeiro in 1992. However, this definition does not for all groups coincide with the groups deemed essential for standard setting and listed in the FCAG. The main difference is the involvement of environmental NGOs required in the FCAG which is not explicitly foreseen in the Agenda 21 definition. Like for international standard setting there are no drop-out mechanisms identified in case 'major interest groups' as defined in the FCAG are absent from the process. Consequently, national standards could be developed and approved without involvement of some of the 'relevant interest groups' and be approved in the absence of 'major interest groups'. However, the procedures for standard setting at both levels, national and international, provide in the revised PEFC system for a more important role of working groups as the approval body cannot change the versions elaborated by these groups but only reject the versions if the development process lacks evidence of consensus.

No fundamental changes have been introduced in the PEFC system for the governance of the international system and for the rules set internationally for governance in national systems. At international level the 'stakeholder forum' was created with the aim to provide more ample opportunities for international organizations to participate in decision making. Still, the overall membership requirements and the rules for voting are not in line with the requirements for credible forest certification systems as defined in the FCAG. The requirements for governance in national PEFC systems remained unchanged and the limited possibilities of external stakeholder groups to influence decision making already identified in the 2008 analysis of the PEFC system have not been substantially improved since.

### Part 3: Conformity Assessment, Certification, and Accreditation

The FCAG criteria 7-11 are mainly conceived to supplement the respective ISO rules which govern the general organizational set-up and the procedures applied by bodies conducting conformity assessment, certification and accreditation. It can be concluded from the analysis that the internationally applicable rules for the certification and accreditation applied in the PEFC system do not substantially exceed the international framework set by ISO standards.

Additional rules included in the PEFC system refer to the transparency of certification reports and stakeholder consultation processes as part of the conformity assessment. Although the procedures require public reports, the provisions for content and availability are not compliant with FCAG requirements. The same applies to stakeholder consultation during assessment which is mentioned in a general way in the documentation but without procedures detailing target groups or methodology. Although provisions are included in the PEFC documentation for both aspects of credible certification systems, the rules do not provide the level of detail required by the more prescriptive wording in the FCAG. As the requirements for this field remained unchanged during the 2010 revision of the PEFC system the results of the assessment presented here are similar to the ones obtained in the 2008 assessment of the PEFC system.

In the PEFC system the accreditation function is carried out by national bodies which adhere to ISO rules. The FCAG requirements for this field which exceed the framework for accreditation set by ISO standard 17011 are therefore not implemented by these bodies. This relates mainly to stakeholder consultation processes and requirements for transparency which are not, to the extent necessary, part of the work of these bodies.

The rules and procedures for group certification were changed by PEFC in 2010 and a new standard supersedes the previously valid provisions for regional certification and group certification. In the past, these procedures allowed for a comparably easy access to certification for holders of small forest areas. While the necessary contractual relations between the different levels participating in group

certification are now more clearly defined in PEFC rules, the circumstances which finally lead to expulsion of members in such organizational set-ups are still unclear.

## Conclusions

The PEFC system was changed for key functions of an international certification system during the PEFC General Assembly in 2010. These changes resulted for a number of issues in a closer alignment of international PEFC standards with other international framework documents such as the FCAG. Progress was made with regard to the content of the international standard for forest management and the procedures for national level standard development. Still, deficits remain with regard to full participation of relevant stakeholders in decision making processes at national and international level as well as for the full transparency of certification and accreditation processes. As transition periods are not defined in PEFC documentation it remains unclear when all PEFC schemes need to be in compliance with revised international rules.

## References

*Unless otherwise indicated all documents are available from the website of the named institutions*

### Documents used for assessment

WWF/World Bank (2006): Forest Certification Assessment Guide; a framework for assessing credible certification systems/schemes; a publication of the WWF/World Bank Global Forest Alliance; July 2006; in press

ISEAL Alliance (2004): ISEAL Code of Good Practice for Setting Social and Environmental Standards, Bonn.

### PEFC Documents (International)

PEFC Technical Document, Annex 6: Certification and Accreditation Procedures (2007)

PEFC Technical Document, Annex 7: Endorsement and Mutual Recognition of National Schemes and their Revision (2007)

PEFC Council technical documents development procedures – requirements; PEFC GD 1003:2009, Issue 1

Administration of PEFC scheme; PEFC GD 1004:2009, Issue 1

Standard Setting – Requirements: PEFC ST 1001:2010

Group Forest Management Certification – Requirements; PEFC ST 1002:2010

Sustainable Forest Management – Requirements; PEFC ST 1003:2010

Chain of Custody of Forest Based Products – Requirements; PEFC ST 2002:2010

PEFCC Statutes (as adopted at the General Assembly 13th November 2009)

### Other references

Auld, Graeme, Gulbrandsen, L. H., and McDermott, C. L.: Certification Schemes and the Impacts on Forests and Forestry; *Annu. Rev. Environ. Resour.* 2008. 33:187–211

Walter, M. (2008): Comparative Analysis of the FSC and PEFC Systems for Forest Management Certification using the Forest Certification Assessment Guide (FCAG)

## Annex 1 - Comparison of PEFC requirements for international standard development and ISEAL Code of Good Practice for Setting Social and Environmental Standards

**Note: In 2008 the international PEFC standards were not developed by the organization but were taken over from political processes for development of criteria and indicators**

ISEAL Requirements	Assessment Results 2010
<p>5.1 Documented procedures for the process under which each standard is developed shall form the basis of the activities of a standard-setting organization.</p>	<p><b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures - requirements</p>
<p>These procedures shall be developed with the active involvement of a balance of interested parties.</p>	<p><b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 4.5</p>
<p>They shall contain a complaints resolution mechanism for the impartial handling of any procedural complaints.</p>	<p><b>Fulfilled</b> PEFC GD 1004:2009, Issue 1 Administration of PEFC scheme; 8</p>
<p>All interested parties shall have access to this complaints resolution mechanism</p>	<p><b>Fulfilled</b> PEFC GD 1004:2009, Issue 1 Administration of PEFC scheme; 8</p>
<p>5.2 Upon commencement of any new standard development activity, interested parties shall be given the opportunity to comment on terms of reference for the proposed standard.</p>	<p><b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 5.3.1</p>
<p>The terms of reference shall include a justification of the need for the standard and clear objectives that the standard seeks to achieve, in particular those objectives that focus on social and/or environmental aspects.</p>	<p><b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 5.3.1</p>
<p>Through a regular review process, interested parties shall also be provided opportunities to comment on the standard-setting process, which highlights the mechanisms by which they can participate.</p>	<p><b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 5.3.1</p>
<p>5.3 When the standard-setting organization is actively engaged in standard-setting activities, it shall publish a work program at least every six months, containing its name and address, a contact point, the standards it is currently preparing, amending or revising and the standards that it has adopted in the preceding period. For each standard listed in the work programme, a brief description shall be included of the scope of the standard, including the objectives and rationale for the</p>	<p><b>Not fulfilled</b> <i>No information could be found in PEFC documentation related to this requirement</i></p>

standard.	
5.4 The public review phase in the development of a new standard or revision of an existing standard shall include at least two rounds of comment submissions by interested parties, where necessary.	<b>Not fulfilled</b>
Each round shall include a period of at least 60 days for the submission of comments. However, this period may be shortened in exceptional circumstances where justified by a policy of the standard-setting organization. In such cases, the modifications and justification shall be documented, and the comment period shall still be no less than 30 days.	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 5.5.2
5.5 The standard-setting organization shall take into account, in the further processing of the standard, the comments received during the period for commenting.	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 5.5.2
The standard-setting organization shall compile comments received according to the issues raised and shall prepare a written synopsis of how each material issue has been addressed in the standard revision.	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 9
This synopsis shall be made publicly available.	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 5.4.1
5.6 The standard-setting process shall strive for consensus among a balance of interested parties.	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 5.5.2
The standard-setting organization shall establish and document procedures to guide decision-making in the absence of consensus.	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 5.5.2
These procedures shall ensure that no group of interested parties can dominate nor be dominated in the decision-making process.	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 5.5.2

Interested parties shall be made aware of these procedures at the outset of the standard-setting activity.	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 5.7
5.7 All approved standards shall be published promptly.	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 5.7
Final international standards shall be placed in the public domain and, with the exception of reasonable administrative costs, shall be made available for free in electronic format.	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 5.7
Other final standards shall be available at as low a cost as possible, and provisions should be made to assist parties with legitimate financial constraints to obtain the relevant documents.	<b>N.A.</b>
On the request of an interested party, the standard-setting organization shall freely provide an electronic copy of its standard-setting procedures, most recent work program or draft standard.	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 5.5.2
Procedures shall be in place to enable hard copies of notices, standards and other related materials to be made available upon request at as low a cost as possible, and covering only reasonable administrative costs.	<b>Not fulfilled</b> <i>No information could be found in PEFC documentation related to this requirement</i>
Where requested, organizations that have set international standards shall, within their means, provide translations of draft and final versions of these standards when relevant.	<b>Not fulfilled</b> <i>No information could be found in PEFC documentation related to this requirement</i>
5.8 Proper records of standard development activities shall be prepared and maintained by the standard-setting organization	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 9
5.9 Standards shall be reviewed on a periodic basis for continued relevance and effectiveness in meeting their stated objectives and, if necessary, revised in a timely manner.	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 7
A review process shall occur at least every five years.	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development

	procedures – requirements, 7
The date of any revisions or reaffirmations of a standard shall be noted in the standard.	<b>Not fulfilled</b> <i>No information could be found in PEFC documentation related to this requirement</i>
A process to receive comments and requests for clarification shall be established and maintained upon publication of the initial standard.	<b>Not fulfilled</b> <i>No information could be found in PEFC documentation related to this requirement</i>
Proposals for revisions can be submitted by any interested party and shall be considered by the standard-setting organization through a consistent and transparent process.	<b>Not fulfilled</b> <i>No information could be found in PEFC documentation related to this requirement</i>
5. 10 The standard-setting organization shall identify at least one focal point for standard-related enquiries and for submission of comments. Contact information for this focal point shall be made easily available	<b>Not fulfilled</b> <i>No information could be found in PEFC documentation related to this requirement</i>
5.11 Administrative requirements relating to conformity assessment and marks of conformity shall be presented separately from technical, process or management requirements	<b>Fulfilled</b> In the PEFC system the standards related to different fields are clearly separated.
6.1 The social, environmental and/or economic objectives of a standard shall be clearly and explicitly specified in the standard.	<b>Not fulfilled</b> <i>No information could be found in PEFC documentation related to this requirement</i>
Standards shall be no more trade-restrictive than necessary to fulfill the legitimate objectives of the standard.	No auditable requirement
6.2 The standard-setting organization shall take account of relevant regulatory and market needs, as well as scientific and technological developments in the standard development process.	<b>Not fulfilled</b> <i>No information could be found in PEFC documentation related to this requirement</i>
6.3 International standards shall be used as the basis for corresponding national or regional standards, except where they would be ineffective or inappropriate.	<b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, all
Where international standards are designed as the basis for national or regional standards, they shall be accompanied by clear guidance or related policies and procedures for taking into account local economic, social, environmental and regulatory conditions where the standard is applied.	<b>Fulfilled</b> Sustainable Forest Management – Requirements PEFC ST 1003:2010, 4 and PEFC Technical Document, annex 7 Endorsement and Mutual Recognition of National Schemes and their Revision, October 2007, all

<p>This guidance shall include criteria to judge the acceptability of proposed local variations in the standard.</p>	<p><b>Not fulfilled</b></p>
<p>6.4 International standards that are to be interpreted at the local level and/or by certification bodies shall avoid language or structure that may create ambiguities in the interpretation of the standard.</p>	<p><b>Not fulfilled</b> <i>No information could be found in PEFC documentation related to this requirement</i></p>
<p>Standards that are intended for direct implementation shall include objective and verifiable criteria, indicators and benchmarks, while being flexible enough to be applied by enterprises of all scales, and to account for local variations.</p>	<p><b>NA</b> <i>This can only be evaluated for national PEFC standards as the international standard is not directly implemented but adapted to local conditions</i></p>
<p>6.5 Standards shall be expressed in terms of a combination of process, management and performance criteria, rather than design or descriptive characteristics.</p>	<p><b>Fulfilled</b> <i>The international forest management standards includes different types of criteria</i></p>
<p>Standards shall only include criteria that contribute to the achievement of the stated objectives.</p>	<p>Fulfilled <i>The international forest management standards includes different types of criteria</i></p>
<p>Standards shall not favor a particular technology or patented item.</p>	<p>Fulfilled <i>The international forest management does not favor specific technologies</i></p>
<p>6.6 With a view to harmonization of standards, a standard-setting organization shall participate within its means in the preparation of relevant international standards that are in line with the vision and objectives of the standard-setting organization.</p>	<p><b>NA</b> <i>This requirement cannot be evaluated on the basis of publicly available documentation</i></p>
<p>6.7 In order for standards to be mutually consistent and free from contradiction for the largest number of user communities, standard-setting organizations shall actively pursue harmonization of standards and/or technical equivalence agreements between standards, where there is a possibility to do so without compromising the rigor of the standard.</p>	<p><b>NA</b> <i>This requirement cannot be evaluated on the basis of publicly available documentation</i></p>
<p>The conformity assessment procedures linked with the standard are to be taken into account when pursuing technical equivalence agreements.</p>	<p><b>NA</b> <i>This requirement cannot be evaluated on the basis of publicly available documentation</i></p>
<p>7.1 Standard-setting organizations shall ensure that participation reflects a balance of interests among interested parties in the subject matter and in the geographic scope to which the standard applies.</p>	<p><b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 4.5</p>

<p>Participants in the standard-setting process should have expertise relevant to the subject matter of the standard and/or be materially affected by the standard.</p>	<p><b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 4.5</p>
<p>7.2 Interested parties shall be provided with meaningful opportunities to contribute to the elaboration of a standard.</p>	<p><b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 4.5, 5</p>
<p>Standard-setting organizations shall identify parties that will be directly affected by the standard and proactively seek their contributions.</p>	<p><b>Not fulfilled</b> <i>No information could be found in PEFC documentation related to this requirement</i></p>
<p>Impartiality shall be accorded throughout the standard development process, so that no single interest predominates.</p>	<p><b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 4.5, 5</p>
<p>Standard-setting organizations shall include a balance of interests in the structures that are responsible for developing and approving social and environmental standards.</p>	<p><b>Fulfilled</b> PEFC GD 1003:2009; PEFC Council technical documents development procedures – requirements, 4.5, 5</p> <p><b>Not fulfilled for approval bodies (s. evaluation of governance in part 2 c)</b></p>
<p>7.3 Where a standard-setting organization has members, membership criteria and application procedures shall be transparent and non-discriminatory.</p>	<p><b>Fulfilled for transparency</b> PEFC Statutes, Article 3</p> <p><i>It cannot be decided in this evaluation if the membership procedures are 'non-discriminatory'. Members in the stakeholder forum have voting rights but these are limited to one third of the total votes. No overall conclusion is therefore possible for this requirement.</i></p>
<p>7.4 Constraints on disadvantaged groups to participate effectively in standard development shall be addressed in the standard development process.</p>	<p><b>Not fulfilled</b> <i>No information could be found in PEFC documentation related to this requirement</i></p>
<p>Standard-setting organizations should consider how the influence of these groups can be increased, even if their participation rates cannot.</p>	<p><b>Not fulfilled</b> <i>No information could be found in PEFC documentation related to this requirement</i></p>
<p>Particular attention should be paid to the needs of developing countries and small and medium-sized enterprises.</p>	<p><b>Not fulfilled</b> <i>No information could be found in PEFC documentation related to this requirement</i></p>

Annex 2 - Comparison of PEFC requirements for national standard development and ISEAL Code of Good Practice for Setting Social and Environmental Standards

ISEAL Requirements	Assessment Results 2010	Assessment Results 2008
5.1 Documented procedures for the process under which each standard is developed shall form the basis of the activities of a standard-setting organization.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 4.1	
These procedures shall be developed with the active involvement of a balance of interested parties.	<b>NA</b> <i>The procedures are developed by the international system</i>	<b>N.R.I.S.</b>
They shall contain a complaints resolution mechanism for the impartial handling of any procedural complaints.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 4.5	Fulfilled PEFC Technical document, Annex 2, 3.5.1
All interested parties shall have access to this complaints resolution mechanism	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.8	Fulfilled PEFC Technical document, Annex 2, 3.5.1
5.2 Upon commencement of any new standard development activity, interested parties shall be given the opportunity to comment on terms of reference for the proposed standard.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.3 d)	<b>N.R.I.S.</b>
The terms of reference shall include a justification of the need for the standard and clear objectives that the standard seeks to achieve, in particular those objectives that focus on social and/or environmental aspects.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.3 a)	<b>N.R.I.S.</b>
Through a regular review process, interested parties shall also be provided opportunities to comment on the standard-setting process, which highlights the mechanisms by which they can participate.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.4	Fulfilled PEFC Technical document, Annex 2, 3.5.1

<p>5.3 When the standard-setting organization is actively engaged in standard-setting activities, it shall publish a work program at least every six months, containing its name and address, a contact point, the standards it is currently preparing, amending or revising and the standards that it has adopted in the preceding period. For each standard listed in the work programme, a brief description shall be included of the scope of the standard, including the objectives and rationale for the standard.</p>	<p><b>N.A.</b></p>	<p>N.A.</p>
<p>5.4 The public review phase in the development of a new standard or revision of an existing standard shall include at least two rounds of comment submissions by interested parties, where necessary.</p>	<p><b>Not fulfilled</b> <i>PEFC documentation requires one round of public consultation</i></p>	<p><b>N.R.I.S.</b></p>
<p>Each round shall include a period of at least 60 days for the submission of comments. However, this period may be shortened in exceptional circumstances where justified by a policy of the standard-setting organization. In such cases, the modifications and justification shall be documented, and the comment period shall still be no less than 30 days.</p>	<p><b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.6</p>	<p>Fulfilled PEFC Technical document, Annex 2, 3.5.2</p>
<p>5.5 The standard-setting organization shall take into account, in the further processing of the standard, the comments received during the period for commenting.</p>	<p><b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.6</p>	<p>Fulfilled PEFC Technical document, Annex 2, 3.5.2</p>
<p>The standard-setting organization shall compile comments received according to the issues raised and shall prepare a written synopsis of how each material issue has been addressed in the standard revision.</p>	<p><b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.6</p>	<p>Fulfilled PEFC Technical document, Annex 2, 3.5.2</p>
<p>This synopsis shall be made publicly available.</p>	<p><b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.6</p>	<p>Fulfilled</p>

5.6 The standard-setting process shall strive for consensus among a balance of interested parties.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.8	<b>N.R.I.S.</b>
The standard-setting organization shall establish and document procedures to guide decision-making in the absence of consensus.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.8	The international system requires consensus
These procedures shall ensure that no group of interested parties can dominate nor be dominated in the decision-making process.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.8	Fulfilled PEFC Technical document, Annex 2, 3.5.2
Interested parties shall be made aware of these procedures at the outset of the standard-setting activity.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.3 e)	Fulfilled PEFC Technical document, Annex 2, 3.5.2
5.7 All approved standards shall be published promptly.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.12	<b>N.R.I.S.</b>
Final international standards shall be placed in the public domain and, with the exception of reasonable administrative costs, shall be made available for free in electronic format.	<b>N.A.</b>	Fulfilled
Other final standards shall be available at as low a cost as possible, and provisions should be made to assist parties with legitimate financial constraints to obtain the relevant documents.	<b>N.A.</b>	<b>N.R.I.S.</b>
On the request of an interested party, the standard-setting organization shall freely provide an electronic copy of its standard-setting procedures, most recent work program or draft standard.	<b>Not fulfilled</b>	<b>N.R.I.S.</b>
Procedures shall be in place to enable hard copies of notices, standards and other related materials to be made available upon request at as low a cost as possible, and covering only reasonable administrative costs.	<b>Not fulfilled</b>	<b>N.R.I.S.</b>

Where requested, organizations that have set international standards shall, within their means, provide translations of draft and final versions of these standards when relevant.	<b>N.A.</b>	N.A
5.8 Proper records of standard development activities shall be prepared and maintained by the standard-setting organization	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 4.3	<b>N.R.I.S.</b>
5.9 Standards shall be reviewed on a periodic basis for continued relevance and effectiveness in meeting their stated objectives and, if necessary, revised in a timely manner.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 6.1	Fulfilled PEFC Technical document, Annex 2, 6
A review process shall occur at least every five years.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 6.1	Fulfilled PEFC Technical document, Annex 2, 6.1
The date of any revisions or reaffirmations of a standard shall be noted in the standard.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 6.2	<b>N.R.I.S.</b>
A process to receive comments and requests for clarification shall be established and maintained upon publication of the initial standard.	<b>Not fulfilled</b>	<b>N.R.I.S.</b>
Proposals for revisions can be submitted by any interested party and shall be considered by the standard-setting organization through a consistent and transparent process.	<b>Not fulfilled</b>	Fulfilled PEFC Technical document, Annex 2, 3.5.3
5. 10 The standard-setting organization shall identify at least one focal point for standard-related enquiries and for submission of comments. Contact information for this focal point shall be made easily available	<b>Not fulfilled</b>	<b>N.R.I.S.</b>
5.11 Administrative requirements relating to conformity assessment and marks of conformity shall be presented separately from technical, process or management requirements	<b>Fulfilled</b> PEFC standards are clearly separated between administrative requirements (conformity assessment, Logo use) and technical requirements	<b>N.R.I.S.</b>

6.1 The social, environmental and/or economic objectives of a standard shall be clearly and explicitly specified in the standard.	<b>Not fulfilled</b>	<b>N.R.I.S.</b>
Standards shall be no more trade-restrictive than necessary to fulfill the legitimate objectives of the standard.	No auditable requirement	No auditable requirement
6.2 The standard-setting organization shall take account of relevant regulatory and market needs, as well as scientific and technological developments in the standard development process.	<b>Not fulfilled</b> <i>This is not explicitly required by PEFC rules for standard setting</i>	<b>N.R.I.S.</b>
6.3 International standards shall be used as the basis for corresponding national or regional standards, except where they would be ineffective or inappropriate.	<b>N.A.</b> <i>(s. evaluation of international standard setting procedures)</i>	Fulfilled PEOLG, ATO/ITTO PCI, ITTO Guidelines
Where international standards are designed as the basis for national or regional standards, they shall be accompanied by clear guidance or related policies and procedures for taking into account local economic, social, environmental and regulatory conditions where the standard is applied.	<b>N.A.</b> <i>(s. evaluation of international standard setting procedures)</i>	Fulfilled Technical document, annex 2
This guidance shall include criteria to judge the acceptability of proposed local variations in the standard.	<b>N.A.</b> <i>(s. evaluation of international standard setting procedures)</i>	<b>Not fulfilled</b>
6.4 International standards that are to be interpreted at the local level and/or by certification bodies shall avoid language or structure that may create ambiguities in the interpretation of the standard.	<b>N.A.</b> <i>(s. evaluation of international standard setting procedures)</i>	Fulfilled
Standards that are intended for direct implementation shall include objective and verifiable criteria, indicators and benchmarks, while being flexible enough to be applied by enterprises of all scales, and to account for local variations.	<b>Not fulfilled</b> <i>No related requirement could be found in PEFC documentation</i>	<b>N.R.I.S.</b>

6.5 Standards shall be expressed in terms of a combination of process, management and performance criteria, rather than design or descriptive characteristics.	<b>Not fulfilled</b> <i>No related requirement could be found in PEFC documentation</i>	<b>N.R.I.S.</b>
Standards shall only include criteria that contribute to the achievement of the stated objectives.	<b>Not fulfilled</b> <i>No related requirement could be found in PEFC documentation</i>	<b>N.R.I.S.</b>
Standards shall not favor a particular technology or patented item.	<b>Fulfilled</b>	<b>N.R.I.S.</b>
6.6 <i>With a view to harmonization of standards, a standard-setting organization shall participate within its means in the preparation of relevant international standards that are in line with the vision and objectives of the standard-setting organization.</i>	<b>Fulfilled</b> National PEFC schemes are also members of the international organization and its decision making committees	N.A. The development of the international frameworks (PEOLG and ATO PCI) is outside the scope of national standard setting bodies
6.7 In order for standards to be mutually consistent and free from contradiction for the largest number of user communities, standard-setting organizations shall actively pursue harmonization of standards and/or technical equivalence agreements between standards, where there is a possibility to do so without compromising the rigor of the standard.	<b>Not fulfilled</b> <i>No related requirement could be found in PEFC documentation</i>	<b>N.R.I.S.</b>
The conformity assessment procedures linked with the standard are to be taken into account when pursuing technical equivalence agreements.	<b>Not fulfilled</b> <i>No related requirement could be found in PEFC documentation</i>	N.A.
7.1 Standard-setting organizations shall ensure that participation reflects a balance of interests among interested parties in the subject matter and in the geographic scope to which the standard applies.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 4.4	<b>N.R.I.S.</b> Participation of interested parties is not mandatory in the PEFC system
Participants in the standard-setting process should have expertise relevant to the subject matter of the standard and/or be materially affected by the standard.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 4.4	<b>N.R.I.S.</b>

7.2 Interested parties shall be provided with meaningful opportunities to contribute to the elaboration of a standard.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.5	Fulfilled PEFC Technical document, annex 2, 3.5.1
Standard-setting organizations shall identify parties that will be directly affected by the standard and proactively seek their contributions.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 4.4 c)	<b>N.R.I.S.</b>
Impartiality shall be accorded throughout the standard development process, so that no single interest predominates.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5	<b>N.R.I.S.</b>
Standard-setting organizations shall include a balance of interests in the structures that are responsible for developing and approving social and environmental standards.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 4.4  <b>Not fulfilled for approval</b>	<b>N.R.I.S.</b>
7.3 Where a standard-setting organization has members, membership criteria and application procedures shall be transparent and non-discriminatory.	<b>Not fulfilled</b> <i>No related requirement could be found in PEFC documentation</i>	<b>N.R.I.S.</b>
7.4 Constraints on disadvantaged groups to participate effectively in standard development shall be addressed in the standard development process.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.2	<b>N.R.I.S.</b>
Standard-setting organizations should consider how the influence of these groups can be increased, even if their participation rates cannot.	<b>Fulfilled</b> Standard Setting – Requirements PEFC ST 1001:2010, 5.2	<b>N.R.I.S.</b>
Particular attention should be paid to the needs of developing countries and small and medium-sized enterprises.	<b>Not fulfilled</b> <i>No related requirement could be found in PEFC documentation;</i>	Fulfilled for SME