



Assessment of the SAFAS (South African Forest Assurance Scheme) against the requirements of the PEFC Council

Final report, 20 July 2018



Woodmotion

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Abbreviations

DAFF	Department of Agriculture, Forestry and Fisheries of the South Africa
EA	European co-operation for Accreditation
E-NGO	Environmental non-governmental organisation
FMP	Forest Management Plan
IAF	International Accreditation Forum
ICFR	Institute for Commercial Forestry Research
ISO	International Standardisation Organisation
PCIS	Principles, Criteria, Indicators and Standards
PEFC	Programme for the Endorsement of Forest Certification
PEFCC	PEFC Council
SANBI	South African National Biodiversity Institute
SFM	Sustainable Forest Management
TPCP	Tree Protection Co-operative Programme (under Forestry and Agricultural Biotechnology Institute)
WG	Working group
WHO	World Health Organisation

1 Background

The SAFAS Council (here-in-after “the applicant”) has submitted its forest certification scheme (here-in-after “the scheme”) (see chapter 6) for mutual recognition and endorsement by the PEFC Council. Following the PEFC Council’s procedures identified in PEFC GD 1007:2017, the PEFC Council selected TJConsulting to carry out an independent and impartial assessment of the scheme documentation against the PEFC Council requirements.

2 Objective

The objective of this assessment is to:

- a) Identify conformities and non-conformities of the scheme’s documentation with the PEFC Council requirements;
- b) Provide the PEFC Council Board of Directors with a recommendation on the endorsement of the submitted scheme’s documentation.

3 Impartiality claim

As the consultant for this assessment, neither TJConsulting nor Mr Jaroslav Tymrak (Principal of TJConsulting) has a vested interest in the development or the management of the scheme; was not involved by consulting or any other means in the development of the scheme and has not provided any other consultancy services to the applicant.

TJConsulting was committed to undertake its assessment of the scheme based solely on submitted information and factual evidence in a professional and impartial manner.

4 Recommendation

Following the evaluation of the SAFAS scheme against the PEFC Council's requirements, TJConsulting **recommends to the Board of Directors to endorse** the SAFAS scheme without further conditions¹.

¹ TJConsulting does not recommend to resolve the minor non-conformities (1) and (2) relating to the standard setting process as this would require the applicant to repeat a significant part of the standard setting process. Therefore, the minor non-conformities should be taken into consideration and resolved during the next regular revision of the scheme.

5 Executive Summary

The assessment of the scheme, including evaluation of the scheme documentation and records; reviewing stakeholders' survey, interviewing key stakeholders and managers of the scheme resulted in the following conclusions that are organised according to the main parts of the PEFC Council requirements.

5.1 Standard setting procedures

The standard setting is governed by SAFAS 2 (*Standard setting procedures*) that is largely based on PEFC ST 1001 and by SAFAS 9 (*Dispute resolution procedures*).

The scheme's standard setting procedures **comply with** PEFC ST 1001.

Details about the assessment and the scheme compliance can be found in chapter 8.2.2 and Annex A of this report.

5.2 Standard setting process

The standard setting process lasted 5 month during July to October 2017 and included key stakeholders in an open and transparent process that resulted in consensus amongst the participating stakeholders.

The **standard setting process** complies with the PEFC requirements except the following two (2) **minor non-conformities**:

- (1) Balance representation of the Working Group (PEFC ST 1001, 4.4a): Trade unions were not participated in the Working Group. No sufficient effort was made to invite this stakeholder group;
- (2) Identification of key and disadvantaged stakeholders (PEFC ST 1001, 5.2)

TJConsulting does not recommend that the minor non-conformities (1) and (2) relating to the standard setting process be resolved before the PEFC endorsement as this would require the applicant to repeat a significant part of the standard setting process. The minor non-conformities should be considered by the applicant and resolved during the next regular revision process.

Details about the assessment and the scheme compliance can be found in chapter 8.2.3, 8.2.4 and Annex A of this report.

5.2 Group forest management certification

The scheme allows group certification as a certification model that is suitable to the small forest owners in South Africa. The requirements for group certification are defined in SAFAS 4 (*Group certification procedures*).

The scheme documentation for the group certification **complies** with the PEFC requirements (PEFC ST 1002).

Details about the assessment and the scheme compliance can be found in chapter 8.3 and Annex B of this report.

5.3 Sustainable forest management standard

The requirements for sustainable forest management are defined in SAFAS 4 (Forest Management Standard).

SAFAS 4 is logically structured and the standard's concept is used consistently throughout the document. The document includes sufficiently detailed management system as well as performance based requirements that allows the standard to be used for conformity assessment activities.

SAFAS 4 **complies** with the requirements of PEFC ST 1003.

Details about the assessment and the scheme compliance can be found in chapter 8.4 and Annex C of this report.

5.4 Chain of custody requirements

The applicant has formally adopted the PEFC International chain of custody standard (PEFC ST 2002) as a part of the scheme and as such **complies** with the PEFC requirements.

Details about the assessment and the scheme compliance can be found in chapter 8.5 of this report.

5.5 Requirements for chain of custody certification bodies

The applicant has formally adopted the PEFC International requirements for chain of custody certification bodies (PEFC ST 2003) as a part of the scheme and as such **complies** with the PEFC requirements.

Details about the assessment and the scheme compliance can be found in chapter 8.6.1 of this report.

5.6 Requirements for forest management certification bodies

The requirements for certification bodies for forest management certification are covered by SAFAS 6 (Certification and Accreditation Procedures).

The scheme's requirements for certification bodies, their accreditation and notification **comply** with Annex 6 of the PEFC Technical Document.

Details about the assessment and the scheme compliance can be found in chapter 8.6.2 and Annex D of this report.

6 Referenced documentation

The following documents have been used for the assessment and are referenced in this report:

PEFC Council requirements:

PEFC ST 1001:2010: Standard setting-Requirements

PEFC ST 1002:2010: Group forest management certification – Requirements

PEFC ST 1003:2010: Sustainable forest management – Requirements

PEFC ST 2001:2008 (second edition): PEFC Logo Usage Rules - Requirements

PEFC ST 2002:2013: Chain of custody of forest based products – Requirements

PEFC ST 2003:2012 (second edition): Requirements for certification bodies operating chain of custody certification against the PEFC Council international chain of custody standard

Annex 6 of the PEFC Technical Document: Certification and Accreditation Procedures

PEFC GD 1004:2009: Administration of PEFC scheme

PEFC GD 1005:2012: Issuance of the PEFC Logo Usage Licenses by the PEFC Council

PEFC GD 1007:2017 Endorsement and Mutual Recognition of National Systems and their Revision

Tender dossier Call for proposals for the assessment of the SAFAS scheme certification scheme against PEFC Council Requirements

The scheme's documentation

The assessment of the scheme was based on the following documentation provided by the PEFC Council on 17 January 2017 and its amended versions provided by the applicant and/or the PEFC Council during the assessment. The latest documentation of the SAFAS scheme were submitted in May 2018.

Submitted scheme documentation

SAFAS 1:2018	SAFAS Council Statutes
SAFAS 2:2018	Standard Setting Procedure
SAFAS 3:2018	Standard Development Report
SAFAS 4:2018	Forest Management Standard
SAFAS 5:2018	Group Certification Procedures
SAFAS 6:2018	Certification and Accreditation Procedures
SAFAS7:2018	Notification of Certification Bodies for Chain of Custody and Forest Management Certification in South Africa against the requirements of the South African Forestry Assurance Scheme.
SAFAS 8:2018	Issuance of PEFC Logo use licenses by SAFAS
SAFAS 9:2018	Dispute resolution procedures
PEFC ST 2001:2008, v2 ²	PEFC Logo usage rules – Requirements
PEFC ST 2002:2013	Chain of custody of forest based products – Requirements
PEFC ST 2003:2012	Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard

Additional submitted documentation

- Application letter for the PEFC endorsement
- SAFAS Statutes
- Checklist of the PEFC Council
- Records relating to the standard setting - submitted as a part of the application
- Records relating to the standard setting - submitted in April 2018

² The PEFC international documents PEFC ST 2001, PEFC ST 2002 and PEFC ST 2003 were adopted by the applicant on 5 September 2017 without modification.

Records on the standard setting process referenced in the assessment

(The references to the following records and evidences are made throughout the report)

- [1] Announcement of the start of the standard setting process at the SAFAS/FSA website, 14/07/2017 (www.forestry.co.za/opportunity-to-participate-in-the-development-of-the-south-african-forestry-assurance-scheme-safas/).
- [2] Website of Forestry South Africa, section on SAFAS (<http://www.forestry.co.za/safas/>)
- [3] SA Forestry Online (17 July 2017): Invitation to participate in the development of the South African Forestry Assurance Scheme, 17/07/2017 (<http://saforestryonline.co.za/certification/invitation-participate-development-south-african-forestry-assurance-scheme/>)
- [4] SAFAS response to the TJConsulting request for additional information (9 April 2018)
- [5] E-mail to Forestry South Africa Environmental Management Committee (13/7/2017)
- [6] E-mail to stakeholders (14/7/2017), invitation to nominate representative to the Working Group
- [7] Stakeholders list (an Excel file) submitted on 9 April 2018
- [8] Stakeholders mapping report, submitted on 9 April 2018
- [9] Text of the announcement of the start of the SAFAS standard setting process: "OPPORTUNITY TO PARTICIPATE IN THE DEVELOPMENT OF THE SOUTH AFRICAN FORESTRY ASSURANCE SCHEME (SAFAS)" (14 July 2017)
- [10] Email communication between the SAFAS Council and WG members between 14 and 28 July 2017 relating to the establishment of the WG.
- [11] Email communication between the SAFAS Council and WG members relating to the formal approval of the standard (6-9 October 2017).
- [12] Announcement of the public consultation at the SAFAS/FSA website (28 July 2017)
- [13] Invitation to public consultation by e-mail (31 July 2017), also identified in the application as D12
- [14] Announcement of the end of public consultation (28 September 2017), also identified in the application as D15
- [15] Summary of consultation and testing – comments and their consideration by the WG (also identified in the application as D 22)
- [16] Announcement of stakeholders consultation of the PCIS process (6 November 2015 to 6 January 2016) at the FSA website (also referred as D2 in the endorsement application)
- [17] Announcement of stakeholders consultation of the PCIS process (6 November 2015 to 6 January 2016) at the Government Gazette of 6 November 2015 (also referred as D2 in the endorsement application)
- [18] Invitation to three stakeholders meetings as a part of the PCIS review process (also referred as D3 in the endorsement application)
- [19] CV of Mr Andries Badenhorst (also identified as D20 in the endorsement application)

- [20] Record on the formal approval of the SAFAS documentation by the SAFAS Council's members (6 October 2017), (also identified in the endorsement application as D24)
- [21] A screenshot of the South Africa Forestry facebook (15 July 2017), (also identified in the endorsement application as D27)
- [22] A screenshot of the Sawmilling South Africa Facebook (15 July 2017), (also identified in the endorsement application as D28)
- [23] An e-mail from Fevertree media (PTY) LTD confirming publication of articles and news relating to the announcement of the start of the process in various media
- [24] E-mail communication between the WG members (July 2017) confirming that the standard can be submitted for public consultation (also identified in the endorsement application as D10).
- [25] Minutes of the WG meeting of 2 October 2017 (also identified in the endorsement application as D21).
- [26] The case of including Indigenous People in Forestry Certification in South Africa, Catherine Sutherland and Jeanette Clark, School of Built Environment and Development Studies, University of KwaZulu-Natal, Durban
- [27] An announcement of the public consultation at the SA Forestry Magazine on 8 August 2017

7 Methodology and timetable

7.1 Scope of the assessment

The assessment was carried out based on PEFC GD 1007:2017, the tender dossier of 4 December 2017 and the TJConsulting's tender proposal of 9 January 2018.

The assessment that resulted in the report was carried out as a desk-top exercise based on the documentation that was provided by the applicant as a part of its application for the PEFC endorsement and during the assessment process (see chapter 6). The standard setting process as well non-conformities identified in the draft report were verified during the country visit.

7.2 Assessment process

Table 1 describes the assessment process that is based on and fully conforms to PEFC GD 1007, the tender dossier of 4 December 2017 and the tender proposal of 9 January 2018.

Table 1: Stages of the assessment process

Stage	Description	Output	Time period
Start of the assessment	PEFC Council announced the start of the assessment process on 16 March 2018. Following the contractual documentation, TJConsulting provided the PEFC Council and the applicant with specific assessment deadlines.	The PEFC announcement on the commencement of the assessment	16 March 2018
Stage 1 assessment	The stage 1 assessment was based on the documentation referred to in the tender dossier and other documentation submitted before the start of the assessment. In addition, TJConsulting asked for and received from the applicant additional documentation and evidence (See chapter 6). Stage 1 assessment also included distribution of the stakeholders questionnaire and its analysis	Draft interim report	20 April 2018
Comment period	The draft interim report was made available to the applicant and the PEFC Council for comments	Responses to the Interim report	20 April 2018 – 25 May 2018
Visit to South Africa	Stakeholders' interview and clarification of non-conformities	Country visit report	12 – 15 May 2018
Stage 2 assessment	Evaluation of responses to the draft interim report and changes to the documentation	Draft final report	10 June 2018

Public consultation	The PEFC Council invited stakeholders to comment on the scheme	Stakeholders comments	10 Nov 2017 - 9 Jan 2018
PEFC Council internal review	The PEFC Council reviewed the final draft report and provided comments to the report	Comments from the PEFC Council	10 May – 18 July 2018
Consideration of the PEFC Council's comments	Consideration of the PEFC Council comments and amendments to the report	Final report	18 July – 25 July 2018

7.3 Classification of non-conformities

The assessment provides for three types of decision relating to the scheme conformity with the PEFC Council's requirements as indicated in chapter 6.2.2 of PEFC GD 1007:

Major nonconformity: The nonconformity against a specific PEFC requirement has a high impact on achieving the intended outcome of the PEFC Sustainability Benchmark.

Minor nonconformity: The nonconformity against a specific PEFC requirement has a low impact on achieving the intended outcome of the PEFC Sustainability Benchmark.

Conformity: A procedure described by the system documentation fully meets the particular requirement of the PEFC Sustainability Benchmark.

In addition to the conformity statements above, the report also includes "observations" that are, however, not causing non-conformities with the PEFC requirements.

8 Assessment

8.1 General analysis of the structure of the scheme

The scheme documentation

The scheme documentation contains 9 SAFAS documents that have been developed by the SAFAS Council and three international PEFC Council standards that have been adopted by the SAFAS Council.

SAFAS 1:2018	SAFAS Council Statutes
SAFAS 2:2018	Standard Setting Procedure
SAFAS 3:2018	Standard Development Report
SAFAS 4:2018	Forest Management Standard
SAFAS 5:2018	Group Certification Procedures
SAFAS 6:2018	Certification and Accreditation Procedures
SAFAS7:2018	Notification of Certification Bodies for Chain of Custody and Forest Management Certification in South Africa against the requirements of the South African Forestry Assurance Scheme.
SAFAS 8:2018	Issuance of PEFC Logo use licenses by SAFAS
SAFAS 9:2018	Dispute resolution procedures
PEFC ST 2001:2008, v2 ³	PEFC Logo usage rules – Requirements
PEFC ST 2002:2013	Chain of custody of forest based products – Requirements
PEFC ST 2003:2012	Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard

The scheme is logically structured following the requirements of the PEFC Council documentation. Each of the following processes are covered by a separate and distinct documentation:

- Standard setting (SAFAS 2),
- Forest management (SAFAS 4)
- Implementation of forest management certification, including group certification (SAFAS 5)
- Certification and accreditation (SAFAS 6)
- Notification of certification bodies (SAFAS 7)
- Issuance of PEFC Logo licenses (SAFAS 8)
- Dispute resolution (SAFAS 9)

³ The PEFC international documents PEFC ST 2001, PEFC ST 2002 and PEFC ST 2003 were adopted by the applicant on 5 September 2017 without modification.

However, the Standard development report (SAFAS 3) provides description of the standard setting process and has no impact on certification process, certified entity or any other body involved in the SAFAS certification. As such the document should be treated as “records” rather than a normative part of the scheme.

Observation:

Each of the SAFAS documents (1-9) include in the second page “Issue date”, “Application date” and “Transition date”. However, those dates, especially the “Issue date”, “Application date” that are essential for the implementation of the documents remain empty. It is therefore unclear when the documents enter into force and can be used.

Organisational arrangement

The following bodies are involved in the development and implementation of the SAFAS scheme. The scheme keeps strict separation of organisations involved in the scheme development and operations.

<p>The SAFAS Council</p>	<p>The Standard setting body/the scheme owner</p> <ul style="list-style-type: none"> - Develops and manages the SAFAS scheme; - Notifies (formally recognises) the certification bodies; - Issues the PEFC Logo licenses in South Africa. <p>For the purposes of the development of the forest management standard, the SAFAS Council forms a Working Group.</p>
<p>Certification body</p>	<p>Certification bodies are responsible for auditing of forest management and chain of custody and issuance of the certificates.</p> <p>The certification is an independent third party that shall be accredited by an accreditation body that is a member of the IAF.</p>
<p>Accreditation body</p>	<p>The accreditation body evaluates competencies and impartiality of the involved certification bodies and makes surveillance of their activities.</p> <p>SAFAS requires the accreditation body to be a member of IAF.</p> <p>The SAFAS Council has been approaching SANAS, the South African accreditation body. However, the scheme also allows other accreditation bodies that are IAF members to provide accreditation activities.</p>
<p>Forest owner / management company / group of forest owners</p>	<p>Forest owners / managers are responsible to implement the forest management standard (SAFAS 4) and comply with it.</p> <p>They are clients to the certification body and recipients of the forest management certificate.</p>
<p>Processing / trading companies</p>	<p>The companies are responsible to implement the chain of custody standard (PEFC ST 2002) and comply with it.</p> <p>They are clients to the certification body and recipients of the chain of custody certificate.</p>

8.2 Assessment of requirements for standard setting

8.2.1 Introduction and summary

History and objectives of the SAFAS forest management standard

The SAFAS forest management standard (SAFAS 4) has been developed based on the PCIS, a governmental document for sustainable forest management developed according to the requirements the National Forest Act (Act 84 of 1998).

The following steps describe the whole process starting from the development of the DAFF (Department of Agriculture, Forestry and Fisheries of the South Africa) Principles Criteria Indicators and Standards (PCIS) to the completion of the SAFAS system:

- a) Development of DAFF PCIs 2002
- b) Revision of DAFF PCI&S 2007 – 2008
- c) Revision of DAFF PCI&S 2016
- d) Evaluation of the PCIS against the PEFC requirements and FSC National Standard.
- e) Conversion of PCIS to a auditable SAFAS Standard
- f) Submission to SAFAS Standard to international Certification system

The SAFAS Standard was developed by analyzing the PCIS requirements, the PEFC Standard setting requirements and the FSC National Standard indicators. These were arranged in categories which corresponded largely to the 7 PCIS' principles for sustainable forest management:

- I. Conserve biological diversity, ecosystems and habitats;
- II. Sustain the potential yield of their economic, social and environmental benefits;
- III. Promote the fair distribution of their economic, social health and environmental benefits;
- IV. Promote their health & vitality;
- V. Conserve natural resources, especially soil and water;
- VI. Conserve heritage resources and promote aesthetic, cultural and spiritual values;
- VII. Advance persons, or categories of persons, disadvantaged by unfair discrimination.

The last revision of the PCIS took place during 2015 and 2016 as a process governed by DAFF. The main aim of the review was to address the impracticality of the past versions of the PCIS, evidenced by the limited level of application by the state and private sector. The emphasis of this revision was developing practical and effective indicators and measures that could be applied to forests at all scales and developed into an auditable checklist. After insights from forestry experts and stakeholders the revision removed a number of redundant requirements and rendered the current version far more suitable for adaptation to a certification standard.

As a part of the 2015/2016 review process the Department of Agriculture, Forestry and Fisheries (DAFF) conducted stakeholders' consultation^[16, 17] as well as three seminars for disadvantaged communities^[18].

8.2.2 Assessment of the standard setting procedures

The SAFAS standard setting and revision process is primarily governed by SAFAS 2 (*Standard setting procedures*) that is largely based on PEFC ST 1001. The document refers to the development and revision of the “SAFAS Standard”, i.e. the SAFAS forest management standard and does not seem to apply to the development of other SAFAS documentation⁴.

It describes the SAFAS Council as the standardisation body but also allows recognition of another body to become the SAFAS standardisation body.

Procedures for the standard setting process

The standard setting procedures follow the process approach defined in PEFC ST 1001 and largely uses the structure and wording of it. SAFAS 2 includes procedural requirements for:

- Identification of stakeholders, including key and disadvantaged stakeholders, their constraints and means of resolving them;
- Announcement of the standard setting in media as well as by direct communication with stakeholders, providing information about the planned process and inviting stakeholders to submit their nominations to the Working Group;
- Establishment of the Working Group;
- Development of the standard by the Working Group;
- Two months public consultation announced in media as well as by direct communication to stakeholders, consideration of their comments and making summary of the comments and their consideration publicly available;
- Pilot testing;
- Decision making of the Working Group and building consensus;
- Formal approval of the standard by the SAFAS Council and their publication;
- Revision of the standard.

Working group for the development of SFM standard

SAFAS 2 requires that the WG is established by the SAFAS Council based on nominations of relevant stakeholders and defines six (6) interest groups that ensure balanced representation of stakeholders:

- (a) Forest owners and forest managers at all scales
- (b) Supply chain from harvest to end user,
- (c) Environmental organizations,
- (d) Government,
- (e) Research,
- (f) Community and labour interests

The decision making is based on consensus. It requires to identify whether or not there is a sustained opposition of the Working Group members by voting and resolving any

⁴ Although a number of provisions of SAFAS 2 (e.g. 6.11) refer to the term “standard/technical documentation” as the text was copied from PEFC ST 1001.

apparent oppositions.

Dispute settlement procedures

SAFAS 2 makes reference to the SAFAS Council's complaints and appeal procedures that are defined in SAFAS 9. Those provide comprehensive procedures for all complaints and appeals relating to the activities of the SAFAS Council, including standard setting.

SAFAS 9 includes procedures for

- Receipt of the complaint/appeal;
- Resolution of the complaint/appeal;
- Communication on the results of the complaint/appeal.

Results of the assessment

SAFAS 2 **complies** with the PEFC ST 1001.

Observations

SAFAS 2, chapter 7.1 includes requirements for the revision of the standard and states that the revision shall follow procedures set out in chapter 7. However, chapter 7 of SAFAS 2 does not include procedures for the development / revision of the standard and it is expected that the reference should have been made to chapter 6 instead.

For more information and detailed assessment, please refer to Annex A of the report.

8.2.3 Assessment of the standard setting process

Scope of the assessment

The scope of this assessment is focused on the SAFAS standard setting process that started in July 2017 and ended in October 2017.

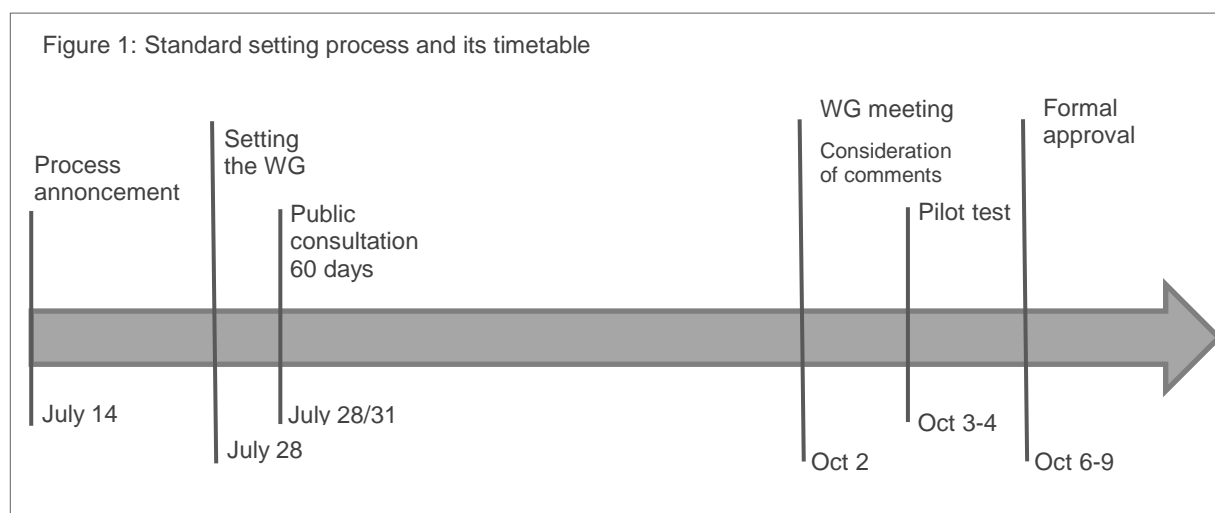
The previous review of the governmental PCIS is only taken into consideration as additional information to understand the context the SAFAS Standard development. In some cases, the PCIS process is also used to mitigate the weak elements of the SAFAS process, i.e. limited number of comments received during the stakeholder's consultation or a limited time provided to the work of the Working Group on the negotiation of the SAFAS Standard.

Following PEFC ST 1001, the assessment is only focused on the development of the forest management standard (SAFAS 4). Development of other SAFAS documentation and standards is out of the scope of this assessment.

Standard setting process

The SAFAS standard setting process formally started in July 2017 by the announcement of the start of the process and invitation to stakeholders to participate in it. The process was completed by formal approval of the SAFAS Standard by the SAFAS Council.

The stages of the process and its timetable is shown in figure 1 (2017):



The process itself is extremely short and did not provide the Working Group with sufficient time to discuss and negotiate the content of the Standard. However, this arrangement is justified by the fact that the SAFAS process followed the PCIS process and that a significant part of the Working Group actively participated in the PCIS process.

Stakeholders mapping

The applicant submitted two documents relevant to the stakeholders mapping:

- a) Stakeholders mapping report^[8] (developed for the purposes of the PEFC endorsement) outlining that the stakeholders mapping was carried out originally by

the Government as a part of the PCIS development process and then was updated by the SAFAS development process. The report also outlines key stakeholders categories, their prevailing interests and key organisations within each category. The document was further improved in May 2018 as a response to this evaluation and its draft interim report.

- b) Stakeholders list^[7] that includes 138 records of stakeholders (individuals and organisations with their contact details and stakeholder category. The list includes stakeholders of the following categories: certification bodies, accreditation bodies, contractors, government (including local and provincial bodies), E-NGOs, trade unions, trade unions, research organisations, etc.

It is evident that the SAFAS Council carried out stakeholders mapping. However, the stakeholders list^[7] that was available at the time of the SAFAS process does not identify the key and disadvantaged stakeholders and constraints of their participation. This was identified as a **minor non-conformity**.

Announcement of the standard setting process

The announcement of the start of the SAFAS standard setting was made at the SAFAS, respectively at the Forestry South Africa's website^[1] on 14 July 2017. The announcement also included invitation to stakeholders to nominate representatives to the Working Group by 24 July 2017. The announcement includes detailed description of the SAFAS standard setting process, information about stakeholders' opportunities to participate in the process, including the Working Group membership and to submit comments on the proposed process. The announcement also made reference to the publicly available standard setting procedures (SAFAS 2).

The announcement was also published in the SA Forestry Online on 17 July 2017^[3], in addition, the invitation was published at the Forestry South Africa's (FSA) Facebook and at the Sawmilling South Africa Journal.

The announcement and the invitation to nominate representative to the Working Group was also distributed by e-mail^[5,6] to a broad range of stakeholders, including a certification body, contractors' association, government, E-NGOs, consultants, forest owners, forest industry, labour unions and research.

The very short time for making the nominations to the Working Group also resulted in the fact that the SAFAS Council received only one nomination and the rest of the Working Group was appointed based on their participation in the PCIS process.

The announcement was made only 10 days before the deadline for the submission of stakeholders nominations. This period does not seem to satisfy the requirement for "timely" manner as 10 days is very limited time for stakeholders, especially those not involved in the preparatory stages of the SAFAS process, to make decision on submission of their nomination. This short notice can partially be explained by the fact that the SAFAS process was preceded by the PCIS process and a large number of stakeholders have either been participated in the process or knew about it.

Working group for the development of SFM standard

The SAFAS Council has established a temporary Working Group for the development of SAFAS forest management standard (SAFAS 4). The Working Group consisted of 7 people that covered the following interests: forest owners / managers (2), Government (2), community and small holders (2), environmental consultant (1).

	Person - representative in the process	Organization/Institution/stakeholder group
1	David Everard	Sappi Forests) - Industry Large Scale forestry
2	Craig Norris	NCT Forestry Cooperative - Industry Smallholders and farmers
3	Makwena Meleka	Department of Agriculture, Forestry and Fisheries, Government
4	Oscar Mokotedi	Department Environmental Affairs - Government Environment
5	Vusi Dladla	(NCT) - Communities and Smallholders
6	Steven Germishuizen	African Environmental Services - Environment
7	Sanele Khuzwayo	(LIMA) - Rural development and communities

The following weaknesses have been identified concerning the composition of the Working Group:

- a) The composition of the Working Group does not include representatives of the “research interest group”;
- b) The composition of the Working Group does not include labour (trade unions) representative as an important concerned interest;
- c) The composition of the Working Group does not include environmental NGO.

Although the Working Group does not include a representative of the research community, their interests and knowledge has nevertheless been represented in the process (verified through interview as a part of the in-country’s visit) as:

- Forest industry has a close working relationship with the key research organisations (ICFR, TCPC) and through its industry’s FSA research advisory committee;
- Mr Norris and Mr Nel (both WG members) are sitting on the steering committees of ICFR and TCPC and in the FSA research advisory committee;
- Dr Everard has research experience.

Although the Working Group does not include a representative of an E-NGO, the process was open to their participation and the environmental interest was represented in the process:

- the representatives of the key E-NGOs (WWF, KZN Wildlife, Wildlife and Environment Society - WESSA, the KZN Crane Foundation, The Oribi Working Group) have all been invited to the process;
- WWF provided comments during the public consultation. The WWF has been interviewed as a part of the assessor’s in-country visit during which they confirmed that they did not participated due to lack of resources and the organisation’s policy towards forest certification.
- Representatives of the Government, especially its environmental branch, represent the environmental interest,
- Mr Germishuizen (an independent consultant and a member of the working group) is working closely with SAMBI E-NGO and has extensive working relationship with the E-NGOs.

A minor non-conformity has been assigned based on the lack of participation of labour unions that neither participated in the working group nor they have been directly invited to nominate their representative. However, it should also be noted that the previous PCIS process was led by the Government that was aware of and supported the labour issues.

Open and transparent work of WG

The Working Group worked from 28 July 2017 until 9 October 2017 when it made its final decision on approval of the SAFAS Standard. During this period:

- The WG had one face-to-face meeting (2 October 2017);
- The WG had an email exchange concerning the decision on sending the document for public consultation (26-31 July 2017),
- The WG had an e-mail exchange concerning the recommendation on the formal approval of the standard.

The work of the Working Group was extremely limited as it included only one meeting and two e-mail requests for decision making. The first decision to circulate the draft document for public consultation was even made before the Working Group was formally established. The time provided to the Working Group phase of the process provided only limited opportunities for the Working Group members to discuss and negotiate its content.

However, taking into account the fact that the SAFAS standard setting process followed the PCIS process (2015/2016) and that a vast majority of the WG members were also participating in the PCIS process, the time provided to the Working Group is considered as justifiable and adequate.

Public consultation

The SAFAS Council organised a public consultation on the draft SAFAS Standard:

- The stakeholders consultation was announced at the SAFAS/FSA website on 31 July 2017 and lasted for 60 days, the website also included the draft Standard^[12],
- The invitation to comment was sent out by email on 31 July 2017^[13],
- An announcement of the public consultation was made at the SA Forestry Magazine on 8 August 2017^[27]
- An announcement was made on 28 September 2017 when the public consultation ended^[14].

During the public consultation, nine (9) comments were received; six (6) of them expressed general support to the standard and three (3) provided specific comments to the requirements. The comments from the public consultation were considered by the Working Group at its meeting held on 2 October 2017. Both the comments as well as result of their consideration are recorded in a single document^[12] and have been made publicly available.

Only a very limited number of comments were received during the public consultation. Although the SAFAS Council made public announcement of the public consultation as required by the PEFC ST 1001, no additional events (such as seminars) were organised.

It should also be noted that comments received shortly after the end of the public consultation has not been considered due to the very tight schedule of the whole process and the fact that the Working Group considered the comments immediately after its end.

On the other hand, it should be also noted that the SAFAS standard setting process followed the PCIS review process that took place during 2015 and 2016. This process also included stakeholders' consultation^[16, 17] (60 days) as well as three seminars for disadvantaged communities, tree farmers and other stakeholders^[18].

Pilot testing

As a part of the SAFAS standard setting process, the SAFAS Council commissioned a pilot testing that was carried out on 3-4 October 2017 and led by Mr Andries Badenhorst, an experienced lead auditor for ISO 9001, ISO 14001 as well as FSC^[18].

The comments from the testing were incorporated into a single document with comments from the public consultation^[15], provided to the WG and incorporated into the next (final) version of the standard. The document^[15] was also made available at the SAFAS/FSA website.

Approval of the standards by consensus (at the WG level)

The voting on the recommendation to formally approve the SAFAS Standard was done by a postal (email) ballot organised on 6th October 2017. All members (7) of the Working Group agreed with the final version of the Standard^[15].

Formal approval of the SFM standard and its publication

The final draft document were formally and unanimously approved by members of the SAFAS Council and shortly published at the SAFAS/FSA website. The SAFAS/FSA website (<http://www.forestry.co.za/safas/>) includes a complete documentation of the SAFAS scheme, including the SAFAS forest management standard (SAFAS 4).

It should be noted that the SAFAS Council amended the submitted SAFAS documents during the PEFC assessment process and formally re-approved them in May 2018.

Results of the assessment

The standard setting process complies with the PEFC requirements except the following two minor non-conformities:

PEFC requirement	4.4b Balanced representation of the Working Group
Type	Minor non-conformity
Description	<p>The working group consisted of 7 people that covered the following interests: forest owners / managers (2), Government (2), community and small holders (2), environmental consultant (1). Membership of the Working Group is presented in Annex E.</p> <p>The minor non-conformity has been assigned based on the lack of participation of labour unions that neither participated in the working group nor they have been directly invited to nominate their representative. However, it should also be noted that the previous PCIS process was led by government that has sufficient knowledge on and supported the labour issues.</p>

PEFC requirement	5.2 Identification of key and disadvantaged stakeholders
Type	Minor non-conformity
Description	<p>The applicant submitted the stakeholder mapping report and stakeholders list. The minor non-conformity has been assigned based on the following arguments:</p> <ul style="list-style-type: none"> a) The stakeholder list^[7] does neither identify the key and disadvantaged stakeholders nor their constraints; d) The stakeholders mapping report^[8] lists some stakeholders per each category and ways of communication towards them. This could be considered as an approach to identify “key” stakeholders. The document also identifies communities as “disadvantaged”. However, the document seems to be developed for the purposes of PEFC endorsement rather than being available in the beginning of the SAFAS standard setting process. <p>However, it should also be noted that the previous PCIS process that the SAFAS process based identified and worked with a large number of stakeholders.</p> <p>In addition, the SAFAS Council amended its procedures (SAFAS 2, ch. 5.1) and included specific clauses relating to the identification of the key stakeholders prior the commencement of the standard setting process.</p>

Observations to the standard setting process (not causing non-conformity with the PEFC requirements)

Limited time of the standard setting process

The SAFAS standard setting process formally lasted only two and half (2.5) months. This can be partially justified and adequate taking into account that the process follows the governmental PCIS process and can use its results. On the other hand this provided very little time for the Working Group to properly discuss the standard and consider stakeholders comments (see for example Annex F which shows that comments received 2 days after the public consultation deadline were not considered).

The announcement was made only 10 days before the deadline for the submission of stakeholder’s nominations. This period is considered as very limited to make decision on submission of their nomination. This is partially justifiable when considering the PCIS process that preceded the SAFAS standard setting process as the relevant stakeholders were already aware of the scope of the standard setting work.

Pilot testing

The document^[15] (comments and responses from the public consultation and testing) suggests that the findings of the testing were considered by the Working Group. However, the testing (3-4/10/2017) was carried out after the only WG meeting (2/10/2017). The results of the pilot testing were only considered by the members of the Working Group as a part of their email postal ballot recommending the standard for formal approval.

8.2.4 Stakeholders interview

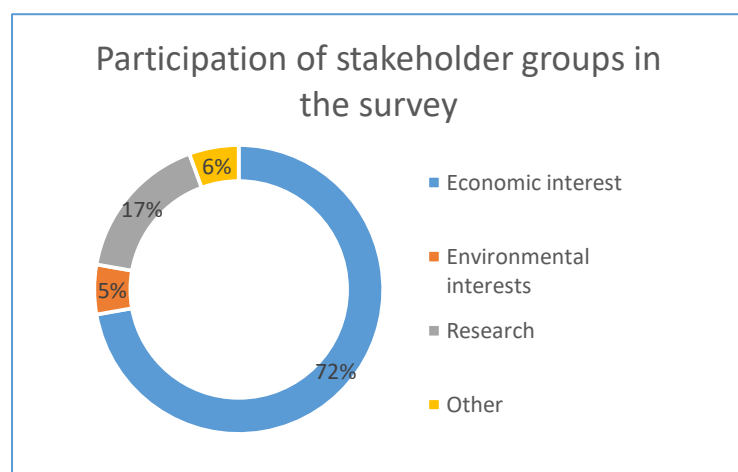
TJConsulting distributed a questionnaire to more than 50 stakeholders in South Africa that covered all stakeholder groups relevant to sustainable forest management with a request to provide feedback on the standard setting/revision process of the SAFAS scheme.

TJConsulting provided stakeholders with a four (4) weeks response period between 23 March 2018 and 22 April 2018 but also responses submitted after the deadline were considered. The results of the survey were taken into consideration in the scheme assessment. However, it should be noted that any interpretation of the survey results should take into consideration the limited number of received responses and the fact that the responses are not balanced according to stakeholders categories.

The questionnaire used in the survey is shown in Annex G to this report.

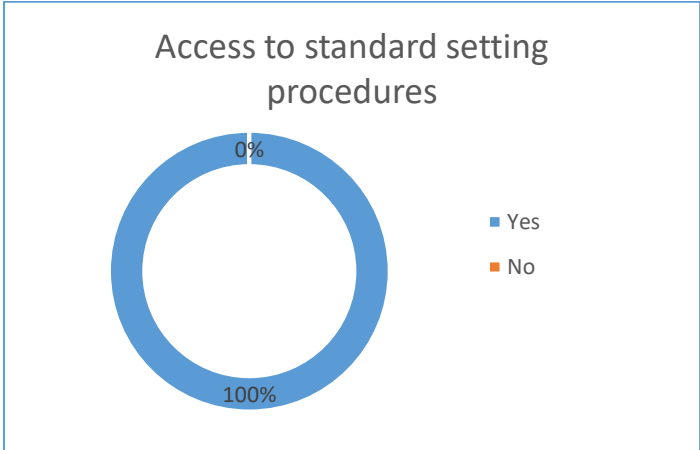
Participation in the stakeholders' survey

18 respondents submitted their responses representing the main stakeholder groups. In some cases more people of a single organization submitted the questionnaire and all were considered as individual respondents.



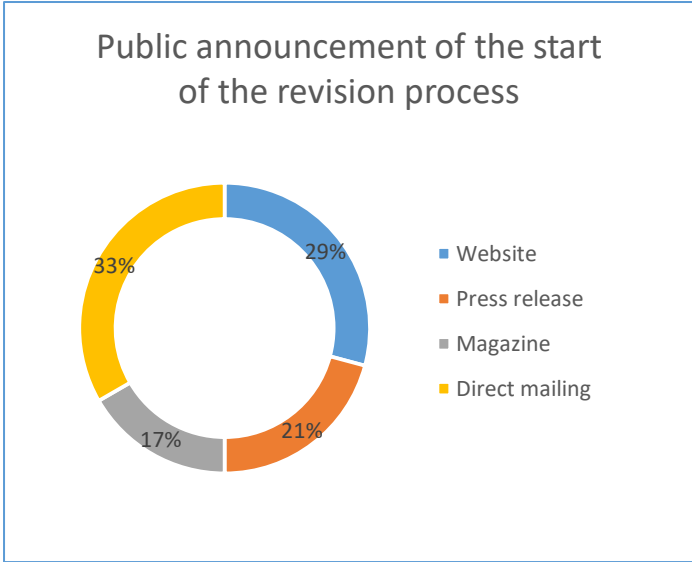
Access to standard setting procedures

All respondents (18) indicated that they had had an access to the SAFAS standard setting procedures.



Public announcement of the start of the revision process

All respondents (18) responded that they have had noticed the public announcement of the start of the revision process. The website announcement and direct mailing were the most efficient means of communication (the respondents could make multiple choices).



Invitation to nominate representatives to the Working Group

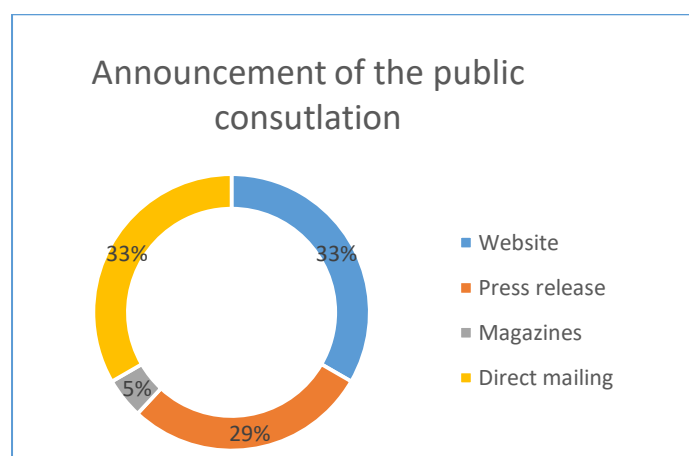
The majority responses (15) indicated in the questionnaire that they have had received an invitation to participate in the Working Group responsible for the development of the SAFAS Standard. Three (3) respondents stated that they have received no invitation. Their response have been further checked by an e-mail or during the in-country visit as the invitation was a part of the announcement of the start of the process and all three respondents indicated that they have received the announcement. They also confirmed that they have misunderstood the question as whether or not they have nominated their representative.

Eight (8) respondents indicated that they have submitted their nomination; seven (7) indicated that their nomination was accepted, one (1) indicated that it was rejected. This respondent was interviewed during the in-country visit and it was explained that the question was misunderstood and that he wanted to indicate that he rejected the invitation.



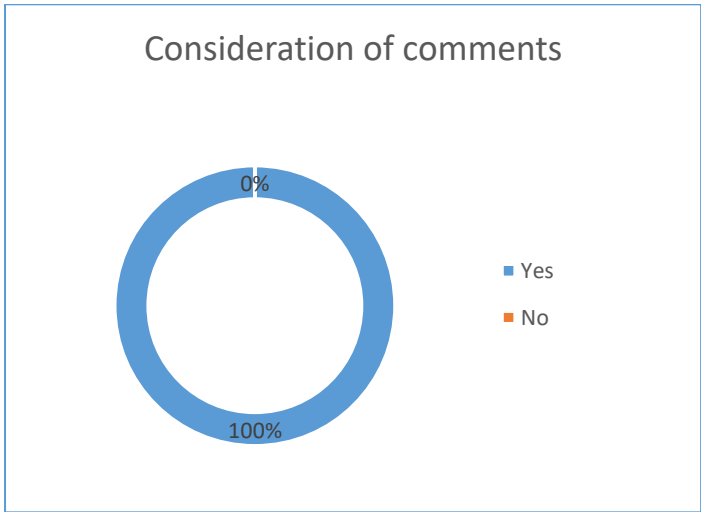
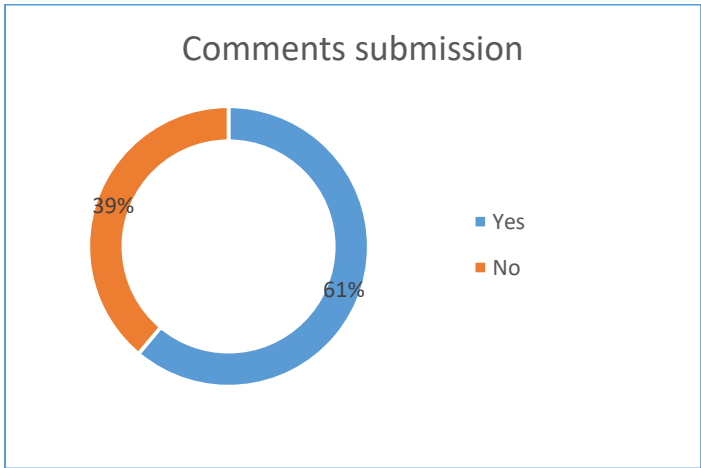
Announcement of the public consultation

All respondents (18) indicated that they had had noticed an announcement of the public consultation; website, press release and direct mailing were quoted as the main communication channel.



Consideration of comments from public consultation

Eleven (11) respondents indicated that they had submitted comments during the public consultation. Ten (10) indicated that their comments have been considered, one responded that he did not know.



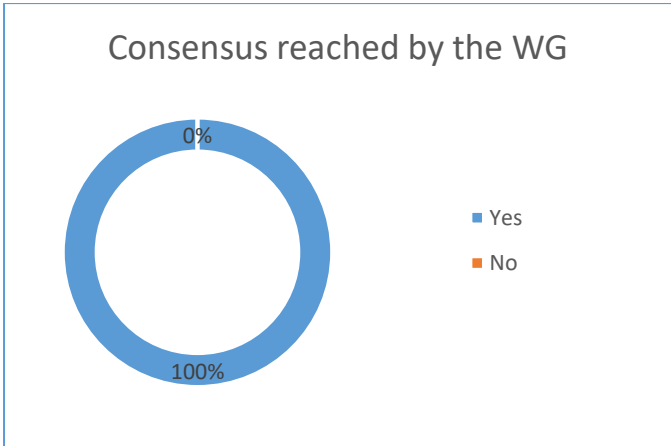
Submission of complaints

All eighteen respondents (18) indicated that they had not submitted to the SAFAS Council a complaint relating to the standard setting process.



Open and transparent work of the Working Group and consensus reached by the Working Group

Eight respondents (8) that have had participated in the Working Group (respectively their organization, responded that the Working Group had been open and transparent and that the Working Group had reached consensus.



8.3 Requirements for group forest management certification

8.3.1 Introduction

The SAFAS scheme allows group certification as a certification model that is mainly suitable to the small forest ownership.

The requirements for the group certification are defined in SAFAS 5 “*Group forest certification*”.

The group certification model is based on a group of participants (forest owners) that is managed and controlled by a “group entity”. Concerning the requirements for the group entity and the participants, SAFAS 5 is identical with PEFC ST 1002.

In addition to requirements that are identical with PEFC ST 1002, SAFAS 5 has a separate chapter for an internal auditing (monitoring) system (chapter 10).

The document (SAFAS 5) also includes general requirements for implementation of forest certification, including individual certification. From this point of view the title of the document does not fully reflect its content.

8.3.2 Group certification model

The approach, content as well as language of SAFAS 5 concerning the group certification model is identical with PEFC ST 1002.

The requirements for the **group entity** contain:

- a) Representation of the group organisation;
- b) Commitment on behalf of the group entity;
- c) Developing written procedures;
- d) Keeping records;
- e) Written agreement with group participants;
- f) Providing participants with confirmation on their participation;
- g) Providing participants with guidance and information;
- h) Operating an annual monitoring programme;
- i) Review of the group’s conformity, implementation of corrective and preventive measures.

The requirements for **participants** contain:

- a) Written commitment to comply with certification requirements;
- b) Compliance with SFM and other scheme requirements;
- c) Co-operation and assistance in the certification process;
- d) Implementation of corrective and preventive measures.

The document provides a separate chapter on the internal monitoring programme that includes annual audits of a sample of participants. The sample is to be defined as a square root of participants and also allows consideration of other risk factors.

Result of the assessment

SAFAS 5 complies with PEFC ST 1002.

Observation

Concerning consideration of non-conformities in case of “multiple certification”, the scheme requires to consider non-conformities from another certifications and provides a mechanism for collection and publication of such non-conformities. However, the implementation of chapter 8.10 (requirement to consider non-conformities from another certification) would be clearer if it is linked to chapter 5.4.4 (mechanism for collection of information on non-conformities by the SAFAS Council).

8.4 Detailed assessment of the forest management standard

8.4.1 Introduction and summary

History of the Standard

Requirements for SFM of the SAFAS scheme are included in SAFAS 4 (Forest Management Standard) that includes mandatory requirements for forest owners/managers applying for forest certification at individual or group level.

The SAFAS standard is based on the South African Principles, Criteria, Indicators and Standards Framework (PCIS). The PCIS are based on national legislation (The National Forests Act - Act No. 84 of 1998) (and have been developed and revised as a result of stakeholder consultation. The first edition was commissioned in 2001. This version was reviewed and revised in 2007/2008, and again in 2015/2016.

In 2016 a steering committee was established to manage the process of using the PCIS to develop an auditable standard to submit to the PEFC for endorsement and to ensure the procedure followed adhered to the PEFC standard development requirements.

Scope of the Standard

Types of forests: SAFAS 4, chapter 5 (Background to South African Forestry) includes an explicit statement that it has been developed for certification of management of forest plantations and that it does not include requirements for management of native (indigenous) forests⁵.

However, this fundamental information on the scope of the standard and its application should be better placed in more visible part of the Standard, in its title or in an alone standing chapter on the Standard's scope. It is expected that the chapter "Background to South African Forestry" has more informative nature and is thus not appropriate for such fundamental scoping provision. This issue is reported as an "Observation" rather than non-conformity and should be considered at the time of the Standard's next revision.

Type of forest ownership/operators: SAFAS 4 has been developed for a broad range of ownership types, including governmental as well as private, large scale as well as small scale operations⁶.

The Standard's indicators are applicable and require compliance of all ownership or forest size categories. However, the Standard's verifiers in some cases differ and provide for different assessment approach for the different ownership categories (Chapter 7 Scope). The ownership

⁵ SAFAS 4, chapter 5: "*The South African forest management standard is focussed on plantation forestry of all commercially grown species present in South Africa. It is applicable to all scales and ownership categories of plantation forestry. Indigenous forests are not covered in this version of the standard*".

⁶ SAFAS 4, chapter "Introduction": *The standard is also specifically designed to accommodate the smaller-scales of forestry (smallholders), the owner managers and communally owned plantations which have up to now found certification prohibitively costly and complicated*".

categories cover: CO – Corporate (large) plantations, OM / owner manager, FF - family forestry (operations carried out by family members) and TA - Traditional Authority (management given to people of the local community by the “Traditional Authorities”).

Structure of the Standard

The requirements of the SAFAS Standard are arranged into 7 Principles. These are as follows:

1. Planning, Legal Compliance and Chain of Custody
2. Engagement with Stakeholders and the Protection of Cultural Heritage
3. Protection of Worker's and Human rights
4. Protection of Soil, Carbon and Water
5. Conservation of Biodiversity and Ecological Integrity
6. Forest Health and Protection
7. Economic Sustainability

Under each principle are a number of Criteria and Indicators which are used to measure compliance with the criteria and include requirements for forest owners/managers. Each Indicator then includes multiple Verifiers which guide the auditor to the information sources that provide evidence of compliance. Where additional guidance would aid managers and auditors it is provided under the verifiers. In addition, the Indicators are also supported by Guidances that are not mandatory but provide useful information on the context of the requirements or their implementation.

No.	Chapter	Criteria	No. of indicators
1.	Planning, Legal Compliance and Chain of Custody	Legal compliance	4
		Management planning and monitoring	4
		Chain of Custody	
2.	Engagement with Stakeholders and the Protection of Cultural Heritage	Tenure, access and use rights	2
		Stakeholders engagement, grievances and disputes	4
		socio-economic development	4
		Cultural, ecological, recreational, historical, aesthetic and spiritual sites and services	1
3.	Protection of Worker's and Human rights	Compliance with National Labour legislation	7
		Health and safety	6
		Worker accommodation and associated services	1
		Skills development in the work force	2
4.	Protection of Soil, Carbon and Water	Productivity and carbon storage potential of soils	4
		Negative impacts to water resources	3
		carbon sequestration and storage	4
5.	Conservation of Biodiversity and Ecological Integrity	Adverse off-site impacts from forestry operations	1
		Prevention or mitigating forestry impacts	6
		Natural habitats and biodiversity	9
6.	Forest Health and Protection	Protection from illegal activities	1
		Responsible use of chemicals and biocontrol agents	8
		Negative impacts of fire	6
		Monitoring, identification and control of pests and diseases	3
7.	Economic Sustainability	Sustainable use of non-timber forest products	2
		Economic sustainability	8

8.4.2 Assessment of the forest management standard

The SAFAS forest management standard has been assessed against the PEFC Council requirements that are defined in PEFC ST 1003. The following “summary” description of the compliance includes description of the SAFAS 4 requirements in relation with key areas of sustainable forest management defined by PEFC ST 1003.

The detailed assessment of individual PEFC requirements, including assessment conclusion and justifications are included in Annex C to this report.

General requirements

General requirements

PEFC ST 1003 requires that SFM requirements shall include management system and performance requirements (4.1a); be clear, objective based and auditable (4.1.b); apply to activities of all operators (4.1.c). It also requires records keeping (4.1d) and definition of responsibilities (5.1.8).

SAFAS 4 includes both management system (e.g. planning, monitoring, etc.) and performance requirements (specific thresholds and verifiers); the requirements are clear and auditable.

The Standard applies to forest managers/owners and their contractors (Scope) be clear, objective based and auditable (4.1.b); apply to activities of all operators (4.1.c); requires records keeping (chapter 1); and responsibilities to be defined (7.2.8).

Maintenance and appropriate enhancement of forest resources

Inventory, planning and mapping of forest resources

PEFC ST 1003 requires inventory, planning, monitoring and evaluation cycle; evaluation of social, environmental and economic impacts and their avoidance (5.1.2, 5.1.3). It requires forest management plans, their content and public availability (5.1.4, 5.1.5, 5.1.6).

SAFAS 4 does not explicitly require the continuous improvement cycle as required by the PEFC requirement. However, its requirements for regular review of forest management plans, taking into account the monitoring results and other aspects (1.2.2) satisfies the objective of the requirement. Indicators 1.1.4 and 5.1.1 requires to prevent adverse environmental and social impacts.

SAFAS 4 clear identification of the FMU, forest management plan and maps. Content of the plans (1.2.1) includes description of the FMU that is consistent with the objective of the term “inventory”.

SAFAS 4 requires forest management plans and their annual review (1.2.1, 1.2.2); defines in very detail their content (1.2.1) and public availability of its summary (1.2.3).

Monitoring of forest resources

PEFC ST 1003 requires periodic monitoring of forest resources (5.1.7)

SAFAS 4 includes references to monitoring in connection with review of the forest management plan (1.2.2) and additional requirements. The standard does not define periodicity of the monitoring activities. However, the fact that monitoring feeds into the annual review of the management plan (1.2.2) implicitly also define the annual monitoring activities. Specific monitoring activities are defined under indicators 2.2.4, 4.1.2, 4.1.4, 5.2.3, 5.3.4, 5.3.5, 5.3.6, 5.3.7, 6.4, 7.2.3, 7.2.5.

Conversion of forests

PEFC ST 1003 prohibits forest conversion to other use and conversion of primary forests to forest plantations, except in justified circumstances (5.1.11)

SAFAS 4 uses similar text as PEFC ST 1003. The extent of “justifiable conversion” (bullet point b) is defined as 10 % of the landscape. Taking into account the fact that all plantations in South Africa have been established on agriculture land rather than by converting native forests, this requirement is justifiable.

Maintenance of forest ecosystem health and vitality

Monitoring of forest health

PEFC ST 1003 requires monitoring of forest health and vitality and key biotic and abiotic factors (5.2.1, 5.2.2)

SAFAS 4 includes comprehensive requirements for integrated pests management programme (6.2.4), for monitoring of forest fires (6.3.1) and other pests and diseases (6.4.1, 6.4.2). The periodicity of the monitoring activities is to be determined for each pests and environmental factor.

Forest lighting

PEFC ST 1003 prohibits forest lightning (5.2.6)

SAFAS 4 requires a comprehensive risk management strategy (6.3.2) and includes a number of requirements relating to control of fires (6.3)

Damages to forest resources

PEFC ST 1003 requires minimization of damages to forest resources, trees and soil (5.2.7, 5.4.10, 5.5.3), avoidance of forest degradation (5.2.4); spillage of oil, disposal of waste in forests (5.2.7)

SAFAS 4 includes requirements for waste management (6.2.2) protection against chemical/hydrocarbon pollution (6.2.3). SAFAS 4 requires minimisation of damages to conservation zones (5.2.6), soil (4.1.1) and water resources (4.2.3).

The standard does not include requirements relating to minimisation of tree damages during harvesting and transportation. However, this is justifiable as the plantation forestry is based on clear-felling of whole compartments and the risk of damages to remaining trees (other compartments) is negligible.

SAFAS 4 includes numerous requirements relating to mitigation of risk of forest ecosystems degradation, including control of invasive species (5.2, 5.3.6), control of fires (5.3.5, 6.3), control of grazing (5.3.7), control of pests and diseases (6.2.4, 6.4) and protection on native ecosystems (5.3.1 and 5.3.2).

Pesticides and fertilizers use

PEFC ST 1003 requires minimization of pesticides use (5.2.8); prohibits the use of WHO Type 1A and 1B, chlorinated hydrocarbons and other pesticides prohibited by the Stockholm Convention (5.2.9, 5.2.10); and their proper use. The use of fertilizers shall be minimized.

SAFAS 4 does not explicitly require minimisation of the usage of pesticides. However, the conformity has been assigned based on the fact that the standard requires the integrated pest management as a mean to the efficient use of chemicals and thus minimisation of their usage (6.2.4). SAFAS 4 prohibits the use of the WHO 1A, 1B pesticides and other toxic pesticides; chlorinated hydrocarbons and pesticides banned by international agreement (the Stockholm Convention), (6.2.5, 6.2.6); and requires controlled use of pesticides (6.2.6).

SAFAS 4 includes requirements for controlled use of fertilisers (6.2.8)

Maintenance and encouragement of productive of forests

Sustainable production of forest products

PEFC ST 1003 requires sustainable production of wood and non-wood products (5.3.1), balance between harvest and increment (5.3.6, 5.1.9) and level of growing stock (5.1.10).

SAFAS 4 includes requirements ensuring sustainable harvest (7.1.1, 7.1.2, 7.1.3 and 7.2.1) and requires to maintain sustainable growing stock (4.3.2) as well as protection of economic (7.2), ecological (4.x) and social interests (6.x).

Sound economic performance

PEFC ST 1003 includes requirements for sound economic performance, possibilities of new markets and diversification of forest products (5.3.2, 5.3.3).

SAFAS 4 includes requirements relating to the economic performance (7.2) and to diversification of production (7.1.3).

Non-timber forest products

PEFC ST 1003 requires sustainable production of non-timber forest products (5.3.7).

SAFAS 4 includes requirements for control of commercial use and sustainable harvest level of non-wood forest products.

Forest infrastructure

PEFC ST 1003 requires adequate forest infrastructure (5.3.8) and minimization of its impact on environment (5.3.3), ecosystems (5.4.11) and water resources (5.5.5).

SAFAS 4 requires minimisation of impacts during the development, maintenance and use of the infrastructure on ecosystems and water resources (4.1.3, 4.2.3).

Maintenance, conservation and appropriate enhancement of biological diversity

Ecologically important forest areas

PEFC ST 1003 requires identification and protection of ecologically important forest areas (5.4.2)

SAFAS 4 requires identification and protection on native ecosystems (5.3.1, 5.3.2) and priority species, threatened and endangered species and their habitats (5.3.3, 5.3.4), wetlands and riparian areas (4.2.1, 4.2.2, and 4.2.3). At least 10 % of the FMU areas shall be set aside for conservation purposes.

Native ecosystems (5.3.1) make reference to the native vegetation types and would cover protected, rare and representative ecosystems as well as wetlands (PEFC requirement, bullet point a) as well as significant landscape areas (PEFC requirement, bullet point d).

Threatened or protected, species and their habitats cover nationally, or globally threatened, possibly endemic and require conservation effort and would satisfy PEFC requirement, bullet point c and d.

Wetlands and riparian areas would satisfy PEFC requirement, bullet point a.

Protected and endangered species

PEFC ST 1003 requires protection of protected and endangered species (5.4.3)

SAFAS 4 requires protection of threatened or protected, species (5.3.2) and priority species (5.3.3) that are defined as “they are usually nationally, or globally threatened, possibly endemic and require conservation effort” (see SAFAS 4, definitions) and broadly cover the protected and endangered species.

Forest regeneration

PEFC ST 1003 requires successful regeneration with preference for natural regeneration (5.4.4); usage of suitable species (5.2.5, 5.2.7, 5.4.5) and controlled use of introduced species (5.4.5).

SAFAS 4 requires successful regeneration (7.2.1) with suitable species (7.2.2). As the Standard applies to plantation forestry, the use of natural regeneration is limited to set-aside or conservation areas for other than production purposes.

The South African plantation forestry is based on the use of exotic tree species. The chosen species shall be suitable for the climate, geology and soils at the planting sites (7.2.2) and the standard has comprehensive requirements to control invasiveness (5.2.1-5.2.3).

Genetically modified organisms (GMOs)

PEFC ST 1003 prohibits the use of GMOs (5.4.7)

SAFAS 4 satisfies the requirement as it explicitly prohibits the use of genetically modified tree species.

Forest structure

PEFC ST 1003 includes requirements for natural diversified structures and processes (5.2.5, 5.4.8), restoration of ecological connectivity (5.4.6).

SAFAS 4 has been established for the purposes of management of forest plantations where the PEFC requirement for horizontal and vertical diversity and diversity of species is not applicable.

PEFC ST 1003 recognises in Appendix 1 that the use of natural structures and processes, and genetic, species and structural diversity cannot be achieved in plantation forestry and that those functions are to be ensured by “set-aside” areas. This approach is satisfied by SAFAS 4 as it requires protection of certain habitats (wetlands, natural forests, etc.) and requires to set aside at least 10 % of the certified area (5.3.2).

SAFAS 4 requires management of wetlands and riparian habitats for the purposes of forest health and connectivity.

Although SAFAS 4 does not explicitly refer to reforestation and afforestation, the “management” of those areas satisfies the purpose of the PEFC requirement, i.e. ecological connectivity.

Balance of animal populations

PEFC ST 1003 includes requirements for balance of pressure of animal populations and grazing (5.4.12).

SAFAS 4 requires protection of forests from both grazing as well as wildlife populations (5.3.7, 6.4.3).

Dead wood

PEFC ST 1003 includes requirements for dead wood, hollow trees, old groves, etc. (5.4.13)

SAFAS 4 has been established for the purposes of management of forest plantations where the PEFC requirement for dead wood is not applicable.

PEFC ST 1003 recognises in Appendix 1 that the use of natural structures and processes, and genetic, species and structural diversity cannot be achieved in plantation forestry and that those functions are to be ensured by “set-aside” areas. This approach is satisfied by SAFAS 4 as it requires protection of certain habitats (wetlands, natural forests, etc.) and requires to set aside at least 10 % of the certified area (5.3.2).

Maintenance and appropriate enhancement of protective functions (water, soil)

Identification and protection of soil sensitive areas

PEFC ST 1003 includes requirements for soil protective functions of forests for society (5.5.1), identification of those areas (5.5.2) and their protection (5.5.3).

SAFAS 4 includes requirements for protection of soil from erosion (4.1.1, 4.1.2, 5.3.7).

Forest plantations in South Africa are not established on sites that have special protective functions to society, e.g. protecting infrastructure from soil erosion, etc.

Identification and protection of water resources

PEFC ST 1003 includes requirements for water protective functions of forests for society (5.5.1), identification of those areas (5.5.2) and their protection (5.5.4).

SAFAS 4 includes requirements for identification and protection of water resources, including wetlands and riparian areas (4.1.1, 4.1.2, 5.3.7).

Maintenance of other socio-economic functions

Contribution to local economy and rural development

PEFC ST 1003 includes requirements for contribution to local economy, rural development, employment opportunities (5.6.1) and long-term health and well-being of communities.

SAFAS 4 includes requirements for socio-economic functions, including rural development, employment, environmental services, etc (2.3, 2.3.1-2.3.4, 7.1.2, 7.1.3).

Property and tenure rights

PEFC ST 1003 includes requirements for identification, recognition and respect of property, tenure, traditional and customary rights (5.6.3).

SAFAS 4 requires identification and respect towards property, land tenure, customary and traditional rights (2.1.2, 2.1.3), including (i) legal tenure rights, servitudes and other legal access rights, (iii) legal and customary rights and (iv) land claims lodged to the FMU (2.1.2).

Indigenous peoples rights

PEFC ST 1003 includes requirements for recognition of indigenous people's rights (5.6.4).

SAFAS 4 (Chapter 9) includes introduction to indigenous peoples in South Africa and concludes that:

- majority of indigenous peoples in South Africa (known as Khoe-San, cca 100.000 people) live in areas that are not suitable for forest plantations;
- the only surviving indigenous people within forest plantations regions are very small in numbers (30-100 people) and are difficult to identify within the local communities and their interest cannot be separated from the interest of local communities.

For these reasons, the standard does not include specific requirements for indigenous people but covers their interest under the requirements for disadvantaged people in local communities.

This approach is considered as justifiable taking into account the specifics of indigenous people in South Africa. The applicant's approach is also consistent with the report of an independent indigenous people's experts^[26] that was primarily prepared for the South African FSC process and that was reviewed by the assessor.

Public access to forests

PEFC ST 1003 includes requirements for an adequate public access to forests (5.6.5)

SAFAS 4 includes requirements that recognise the range of resources and ecosystem services and benefits to local communities (7.1.2), access and use by legitimate rights holders (2.1.2), community needs (2.2.3) and access to cultural, ecological and recreational sites for interested and affected parties (2.4.1).

Although the standard does not provide full public access to forest resources, taking into account the intensive plantation management, safety as well as fire risks, the approach of providing access to selective sites (2.4.1) and co-operation with local communities in use and access to adjacent forest (2.1.2, 2.2.3) satisfies the objective of the "adequate" access.

Historical, cultural and spiritual sites

PEFC ST 1003 includes requirements for protection of special historical, cultural and spiritual sites (5.6.6)

SAFAS 4 requires access to sites of cultural, ecological, recreational historical and spiritual significance (2.4.1). The standard also requires active approach of communication and cooperation with local communities in using forest resources (2.2.3, and its Guidance). This approach satisfies the objective of managing sites important for needs of local communities.

Recreational and aesthetic functions

PEFC ST 1003 includes requirements for recreational and aesthetic functions of forests (5.6.7)

SAFAS 4 requires to protect native ecosystems (representative sample areas, 5.3.2), wetlands and riparian areas and it is expected that those areas are set-aside from intensive plantation management.

PEFC ST 1003 recognises in Appendix 1 that the use of natural structures and processes, and genetic, species and structural diversity cannot be achieved in plantation forestry and that those functions are to be ensured by “set-aside” areas. This approach is satisfied by SAFAS 4 as it requires protection of certain habitats (wetlands, natural forests, etc.) and requires to set aside at least 10 % of the certified area (5.3.2).

Employees training on SFM

PEFC ST 1003 includes requirements for employees training on SFM (5.6.8)

SAFAS 4 requires training for workers and requires appropriate skills certificates (3.4.1)

Local communities, consultation, dispute settlement

PEFC ST 1003 includes requirements for communication, consultation, dispute settlement (5.6.10) and usage of knowledge (5.6.9) of local communities.

SAFAS 4 include comprehensive requirements (2.2) for engagement with local communities, including resolution of grievances (2.2.2) and understanding of local communities needs (including consultation and communication outlined in verifiers) and consideration of any community disharmony (2.2.3).

SAFAS 4 requires identification of native ecosystems and priority species following the “Best Available Information” approach. The definition of the approach includes usage of local knowledge and consultation with stakeholders and satisfies the objective of the requirement.

Occupational health and safety

PEFC ST 1003 includes requirements for occupational health and safety and management of associated risks (5.6.11, 5.6.12)

SAFAS 4 has comprehensive requirement for occupational health and safety (3.2) including identification of risks (3.2.1), measures described in procedures (3.2.2) and information /training to be provided to workers (3.2.3), safe work procedures (3.2.4), personal protective equipment (3.2.5) and records keeping (3.2.6).

Labour rights

PEFC ST 1003 requires compliance with the fundamental ILO Conventions (5.6.13).

SAFAS 4 includes explicit requirements for compliance with applicable labour legislation.

SAFAS 4 satisfies the requirement as South Africa ratified all Fundamental ILO Conventions and there is sufficient level of confidence that those conventions were incorporated into the national legislation.

(http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:102888)

Forest related research

PEFC ST 1003 includes requirements for research based forestry and support to research activities (5.6.14)

SAFAS 4 requires management to be based on the results of research (1.2.4)

Compliance with legal requirements**Forest owner/manager's compliance with legal requirements**

PEFC ST 1003 includes requirements compliance with legal requirements (5.7.1).

SAFAS 4 requires compliance with legislation (1.1.1, 1.1.3). The areas of laws and specific Acts listed in Appendix 1 satisfy the scope of legal compliance of the PEFC requirement.

Protection against illegal activities

PEFC ST 1003 requires protection of forests against illegal activities of third parties (5.7.2).

SAFAS 4 includes requirement for protection of forests against illegal activities of third parties, including timber theft, illegal hunting, fishing, trapping, collecting, settlement and other unauthorized activities (6.1.1)

Results of the assessment

SAFAS 4 complies with PEFC ST 1003 except for the following non-conformities:

8.5 Assessment of the chain of custody requirements

The applicant has not submitted for the assessment and PEFC endorsement its own scheme specific chain of custody standard and its own, scheme specific requirements for chain of custody certification bodies. The PEFC endorsement application included the PEFC Council's international standards PEFC ST 2002 and PEFC ST 2003.

Based on this fact, it can be assumed that the applicant intends to use the PEFC International Chain of Custody Standard, PEFC ST 2002 for the purposes of chain of custody certification.

Therefore, the assessment of the chain of custody requirements is only focused on whether or not the applicant formally adopted PEFC ST 2002 as a part of its scheme and PEFC ST 2002 is mandatorily required to be used for the purposes of chain of custody certification.

- The applicant has not submitted evidence that the SAFAS Council would formally adopt PEFC ST 2002 as a part of the SAFAS scheme;
- PEFC ST 2002 is referenced in all SAFAS standards amongst the Normative References.
- PEFC ST 2002 is referenced in the notification procedures (SAFAS 7). It requires the notified certification body to carry out the chain of custody certification against the PEFC international chain of custody standard (PEFC ST 2002)⁷.

Conclusion

The SAFAS Council adopted the PEFC international standards indirectly through mandatory references in notification procedures and through Normative References chapter in all SAFAS standards/documents.

The scheme satisfies the PEFC requirements for chain of custody.

⁷ It should be noted that assessment of notification procedures against PEFC GD 1004 is not covered by the scope of this assessment.

8.6 Requirements for certification bodies

8.6.1 Requirements for chain of custody certification bodies

The applicant's scheme has adopted the PEFC international chain of custody standard for the purposes of chain of custody certification (See chapter 8.4).

Therefore, the applicant is expected to also formally adopt the PEFC international requirements for chain of custody certification bodies (PEFC ST 2003) without any modifications. The applicant is not allowed to develop any scheme specific requirements for chain of custody certification bodies.

Therefore, the assessment is focused on:

- a) Formal adoption of PEFC ST 2003 by the applicant as a part of the scheme and a sole document with requirements for chain of custody certification bodies;
- b) Whether or not the applicant developed scheme specific requirements for chain of custody certification bodies.

Formal adoption of PEFC ST 2003

- The applicant has not submitted evidence that the SAFAS Council would formally adopt PEFC ST 2003 as a part of the SAFAS scheme;
- PEFC ST 2003 is referenced in all SAFAS standards amongst the Normative References.
- PEFC ST 2003 is referenced in the notification procedures (SAFAS 7). It requires the notified certification body to meet the requirements of PEFC ST 2003.
- SAFAS 4 (Certification and Accreditation Requirements) only includes requirements for forest management certification bodies and includes a statement that the requirements for certification bodies are included in PEFC ST 2003.

Conclusion

The SAFAS Council adopted the PEFC international standard PEFC ST 2003 indirectly through mandatory references in notification procedures and through Normative References chapter in all SAFAS standards/documents. The SAFAS scheme has not developed any scheme specific requirements for chain of custody certification bodies.

The scheme satisfies the PEFC requirements for certification bodies operating chain of custody certification.

8.6.2 Assessment of requirements for forest management certification bodies

8.6.2.1 Introduction and summary

Coverage and scope of requirements

The requirements for certification bodies for forest management certification are described in SAFAS 6 (*Certification and Accreditation Procedures*). The referenced document includes only requirements for certification bodies operating forest management certification and makes a reference to PEFC ST 2003 concerning the applicable requirements for certification bodies operating chain of custody certification.

Detail of the requirements (SAFAS 6)

The requirements for certification bodies of SAFAS 6 are written in a very general way and in a vast majority of cases the text is identical or does not exceed the level of detail of Annex 6 of the PEFC Council Technical Document. Although this approach has not been classified as non-conformity, it is not in line with the spirit of the PEFC Council meta-standards and the general expectation that the requirements of national schemes/standards will be written in more detailed way.

In many cases, the document describes requirements that are already covered by ISO 17021 or ISO 19011.

Certification and accreditation framework

SAFAS 6 makes reference to ISO 17021-1:2015 and as such considers the forest management certification as management system certification.

SAFAS 6 makes reference to an accredited certification where the accreditation is issued by a national accreditation body that is a member of IAF.

Chapter 6.7 of SAFAS 6 provides possibility for an exemption from the accreditation requirements to be made by the PEFC Council General Assembly. Although the PEFC Council General Assembly is the highest decision making body within the PEFC scheme, the current PEFC documentation does not include procedures for making such exemptions and the SAFAS Council is not in a position to define which exemptions can and cannot be made by the PEFC Council General Assembly. However, this issue has not been considered as a non-conformity as it has no impact on the scheme performance without an active PEFC Council's decision.

It should be noted that while SAFAS 6 makes the reference to the latest ISO 17021-1 standard (2015), SAFAS 7 (notification of certification bodies) makes reference to the previous version of the standard (2011).

Competencies of the certification body and auditors

SAFAS 6 includes requirements for competencies of certification body and auditors that are largely identical with Annex 6 (with reference to ISO 19011), except for education of the auditors where it defines specific requirements.

Stakeholders' consultation

SAFAS 6 requires to consider as audit findings also information from third parties and for this purpose to carry out a stakeholders consultation.

Public availability of the certification report summary

SAFAS 6 requires that the certification report is available from the SAFAS Council no later than 3 months after an audit.

Notification of certification bodies

SAFAS 6 requires that certification bodies shall be notified by the SAFAS Council. SAFAS 7 (notification of certification bodies) includes procedural requirements for the notification, including a specimen notification contract.

Neither SAFAS 6 nor SAFAS 7 include requirements that could be deemed as discriminatory.

Assessment conclusion

The scheme's requirements for forest management certification bodies, their accreditation and notification **comply** with the Annex 6 of the PEFC Technical Document.

Detailed assessment of SAFAS requirements for forest management certification bodies is included in Annex D to this report.

Annex A: Detailed assessment of the standard setting procedures and the standard setting process⁸

PEFC ST 1001, 4.1		
4.1 The standardising body shall have written procedures for standard-setting activities describing:		
a) its status and structure, including a body responsible for consensus building (see 4.4) and for formal adoption of the standard (see 5.11),	Procedures	<p>According to Article 2 of the SAFAS Statutes, the SAFAS Council will act as the Standardising Body for the development of the SAFAS standard and for the periodic, 5-yearly revision of this standard. The Council may also establish a separate Standardising Body in the future.</p> <p>Formal adoption of the standard:</p> <p>SAFAS 2, ch. 4 states that the SAFAS Council shall establish a Working Group for the development and revision of the standard.</p> <p>Body responsible for consensus building</p> <p>SAFAS 2, ch. 6.11 requires that the standard is formally approved by the SAFAS Council.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 defines both, a body for the consensus building as well as the body for the formal approval of standards.</p>
b) the record-keeping procedures	Procedures	<p>SAFAS 2, chapter 7.1 includes requirements for records keeping and their public availability.</p> <p>Compliance: Conformity</p> <p>Justification: SAFAS 2 requires the keeping of records relating to the standard setting process.</p>
c) the procedures for balanced representation of stakeholders,	Procedures	<p>SAFAS 2, chapter 5 defines composition of the SAFAS Working Group, chapters 6.8 and 6.9 define decision making of the Working Group.</p> <p>Compliance: Conformity</p> <p>Justification: SAFAS 2 includes procedures for balanced representation of stakeholders.</p> <p>It should be noted that this statement only reflects presence of procedures, not whether those procedures are appropriate or not.</p>
d) the standard-setting process,	Procedures	<p>SAFAS 2 chapter 6 includes procedures for the standard setting/revision process.</p> <p>Compliance: Conformity</p>

⁸ The numbers in brackets [] identify referenced documentation as listed in chapter 6

		Justification: SAFAS 2 includes procedures for the standard-setting process.
e) the mechanism for reaching consensus, and	Procedures	SAFAS 2, chapter 6.8 and 6.9 include procedures for consensus building within the Working Group. Compliance: Conformity Justification: SAFAS 2 includes procedures for reaching consensus. It should be noted that this statement only reflects presence of procedures, not whether those procedures are appropriate or not.
f) revision of standards/normative documents.	Procedures	SAFAS 2, chapter 7 includes procedures for the revision of standards. Compliance: Conformity Justification: SAFAS 2, chapter 8 defines procedures for the revision of standards. It should be noted that this statement only reflects presence of procedures, not whether those procedures are appropriate or not.

PEFC ST 1001, 4.2	
4.2 The standardising body shall make its standard-setting procedures publicly available and shall regularly review its standard-setting procedures including consideration of comments from stakeholders.	
Procedures	<p>SAFAS 2, chapter 6.3 requires that the public announcement shall make references to the publicly available standard setting procedures.</p> <p>SAFAS 2, chapter 4.1 requires that the Standardisation Body shall make its standard setting procedures publicly available.</p> <p>Compliance: Conformity</p> <p>Justification: SAFAS 2 satisfies the requirement.</p>
Process	<p>SAFAS 2 is made publicly available at the website of Forestry South Africa (http://www.forestry.co.za/safas/)^[2].</p> <p>Reference was made to the draft standard setting procedures in the announcement of the standard setting process^[1] (14/07/2017).</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is publicly available.</p>

PEFC ST 1001, 4.3	
4.3 The standardising body shall keep records relating to the standard-setting process providing evidence of compliance with the requirements of this document and the standardising body's own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request.	
Procedures	<p>SAFAS 2, chapter 8.1 requires that "This includes all relevant records and information providing evidence of compliance with this document and all SAFAS procedures such as minutes, announcements on the progress of the standard-setting or revision process, responses from stakeholders and any disputes or recommendations lodged with the SAFAS Council. These records will be kept for at least 5 years and be made public on the website of SAFAS or by request".</p> <p>Compliance: Conformity</p> <p>Justification: SAFAS 2 requires records keeping relevant to the standard setting process and requires the records to be kept for a minimum of five years.</p>
Process	<p>As a part of the application for the PEFC endorsement and during the course of this assessment, a whole range of documents and records (see chapter 6) relating to the standard setting / revision process has been submitted by the applicant and assessed by the assessor.</p> <p>Compliance: Conformity</p> <p>Justification: The presentation of records as a part of the endorsement application as well as during this assessment provides sufficient evidence that the relevant records have been kept.</p>

PEFC ST 1001, 4.4	
4.4 The standardising body shall establish a permanent or temporary working group/committee responsible for standard-setting activities.	
Procedures	<p>SAFAS 2, chapter 4 includes procedures for establishment of the Working Group that is responsible for the development of the SAFAS standard(s).</p> <p>As the Working Group shall be assembled at the start of the revision process (SAFAS 2, chapter 4.3), it is expected that the SAFAS Working Group is a temporary body.</p> <p>Compliance: Conformity</p> <p>Justification: SAFAS 2 defines and establishes a body (the Working Group) responsible for the standard setting activities.</p>
Process	<p>The WG was established in July 2017 and consisted 7 people. Their composition is described under the following requirements (4.4a – 4.4.c) and presented in Annex E.</p> <p>Compliance: Conformity</p>

PEFC ST 1001, 4.4 a	
4.4 a [The working group/committee shall]: be accessible to materially and directly affected stakeholders,	
Procedures	<p>SAFAS 2, chapter 4.2 states that the Working Group shall “be accessible to materially and directly affected stakeholders”.</p> <p>SAFAS 2, chapter 4.3 states that “The SAFAS Standardising Body shall invite all relevant interested organizations to participate in the SAFAS Working Group”.</p> <p>SAFAS 2, chapter 4.4 states that “Any organization, complying with clause 3.2 that has not been invited can apply to the SAFAS Council, should they wish to participate in the SAFAS Working Group. The council will decide on their participation”.</p> <p>SAFAS 2, chapter 6.3 states that “an invitation to stakeholders to nominate their representative(s) to the Working Group / committee. The invitation to disadvantaged and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is understandable”.</p> <p>SAFAS 2, chapter 6.4 states that “The standardising body shall ... and establish a working group/committee or adjust the composition of an already existing working group/committee based on received nominations. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the working group/committee and resources available for the standard-setting”.</p> <p>Conclusion: Conformity</p> <p>Justification: The term “accessible to all stakeholders” is interpreted as that a stakeholder organisation within or outside the membership of the standardisation organisation can (i) make nomination to the committee/body responsible for building consensus, (ii) these nominations are considered and (iii) any appointment/refusal of the nomination is justifiable. SAFAS 2 satisfies all three conditions.</p>

Process	<p>The invitation to nominate a representative to the Working Group was made as a part of the announcement of the start of the standard setting process at the SAFAS, respectively at the Forestry South Africa's website^[1] (14/7/2017). The deadline for submitting the nominations was set up on 24 July 2017.</p> <p>The invitation was also published at the following media:</p> <ul style="list-style-type: none"> - SA Forestry Online (17 July 2017) ^[3] - Forestry South Africa's (FSA) Facebook (15 July 2017) ^[21] - Sawmilling South Africa facebook (15 July 2017) ^[22] - Sawmilling South Africa website (17 July 2017) ^[23] <p>Invitation to nominate representative was also distributed by e-mail to:</p> <ul style="list-style-type: none"> - Forestry South Africa Environment Management Committee (mainly forestry industry representatives) ^[5]; - A range of stakeholders^[6], including certification body, contractors, government, E-NGOs, consultants, forest owners, forest industry, labour unions, research. <p>Information and e-mail communication with members of the Working Group indicates that the SAFAS Council accepted all received nominations.</p> <p>Compliance: Conformity</p> <p>Justification: SAFAS made public announcement of the start of the standard setting process which also included open invitation to nominate representatives to the Working Group. The invitation was made publicly available through various media and was also sent directly by e-mail to a broad range of stakeholders and as such reached all of the concerned stakeholder groups. The received information indicates that the SAFAS Council accepted all received nominations.</p>
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PEFC ST 1001, 4.4 b	
4.4 b [The working group/committee shall]: have balanced representation and decision-making by stakeholder categories relevant to the subject matter and geographical scope of the standard where single concerned interests shall not dominate nor be dominated in the process	
Procedures	<p>SAFAS 2, chapter 5.1 states that:</p> <p>“The SAFAS Working Group shall have a balanced representation of interest groups and will be set up in such a way that no single interest group can dominate the decision making process...The interest groups invited to be part of the SAFAS Working Group are:</p> <ul style="list-style-type: none"> a) Forest owners and forest managers at all scales b) Supply chain from harvest to end user, c) Environmental organizations, d) Government, e) Research, f) Community interests and labour”. <p>Chapter 6.8 and 6.9 define decision making and consensus building of the working group outlining formal voting procedures (6.8) and resolution of sustained opposition (6.9).</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 defines 6 interest groups with equal decision making rights. The decision making requires consensus and resolution of sustained opposition.</p>

Process	<p>The working group consists of 7 people that covered the following interests: forest owners / managers (2), Government (2), community and small holders (2), environmental consultant (1). Membership of the Working Group is presented in Annex E.</p> <p>Compliance: Minor non-conformity</p> <p>Justification: The representation includes key stakeholders relating to sustainable forest management in South Africa.</p> <p>Although the working group does not include a representative of the research community, their interests and knowledge has been represented in the process (verified through interview as a part of the in-country's visit) as:</p> <ul style="list-style-type: none"> - Forest industry has a close working relationship with the key research organisations (ICFR, TCPC) and through its industry's FSA research advisory committee; - Mr Norris and Mr Nel (both WG members) are sitting on the steering committees of ICFR and TCPC and in the FSA research advisory committee; - Dr Everard has research experience. <p>Although the working group does not include a representative of an E-NGO, the process was open to their participation and the environmental interest was represented in the process:</p> <ul style="list-style-type: none"> - the representatives of the key E-NGOs (WWF, KZN Wildlife, The Wildlife and Environment Society - WESSA, the KZN Crane Foundation, The Oribi Working Group) have been invited to the process^[6]; - WWF provided comments during the public consultation^[15]. The WWF has been interviewed as a part of the assessor's in-country visit during which they confirmed that they did not participated due to lack of resources and the organisation's policy towards forest certification. - Representatives of the Government, especially its environmental branch, represent the environmental interest, - Mr Germishuizen (an independent consultant and a member of the working group) is working closely with SAMBI E-NGO and has extensive working relationship with the E-NGOs. <p>The minor non-conformity has been assigned based on the lack of participation of labour unions that neither participated in the working group nor they have been directly invited to nominate their representative. However, it should also be noted that the previous PCIS process was led by the government that was aware of and supported the labour issues.</p>
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PEFC ST 1001, 4.4 c	
4.4c [The working group/committee shall]: include stakeholders with expertise relevant to the subject matter of the standard, those that are materially affected by the standard, and those that can influence the implementation of the standard. The materially affected stakeholders shall represent a meaningful segment of the participants.	
Procedures	<p>SAFAS 2, chapter 5.1 states that:</p> <p>“The SAFAS Working Group shall have a balanced representation of interest groups and will be set up in such a way that no single interest group can dominate the decision making process. The interest groups invited to be part of the SAFAS Working Group are:</p> <ul style="list-style-type: none"> (a) Forest owners and forest managers at all scales, (b) Supply chain from harvest to end user, (c) Environmental organizations, (d) Government, (e) Research, (f) Community interests and labour”. <p>Compliance: Conformity</p> <p>Justification: The composition of the Working Group provides for sufficient expertise in forest management and affected stakeholders, especially forest owners are well represented.</p>
Process	<p>The working group consists of 7 people that covered the following interests: forest owners / managers (2), Government (2), community and small holders (2), environmental consultant (1). Membership of the Working Group is presented in Annex E.</p> <p>Compliance: Conformity</p> <p>Justification: The composition of the Working Group provides for sufficient expertise in forest management and affected stakeholders are well represented.</p>

PEFC ST 1001, 4.5	
4.5 The standardising body shall establish procedures for dealing with any substantive and procedural complaints relating to the standardising activities which are accessible to stakeholders.	
Procedures	<p>SAFAS 2, chapter 9 makes a reference to SAFAS 9.</p> <p>SAFAS 9 is an alone standing document that provides for complaints and appeals procedures and its chapter scope explicitly states that the document also covers complaints/appeals relating to standard setting.</p> <p>Compliance: Conformity</p> <p>Justification: SAFAS 2 and SAFAS 9 satisfy the requirement.</p>
Process	<p>The applicant claims that no formal complaint has been received during standard setting process and that the standardisation body only responded to received questions relating to the standard setting process.</p> <p>Compliance: Conformity</p>

	<p>Justification: The applicant claim was verified based on feedback from the stakeholders' questionnaire and from the stakeholders' interviews during the in-country visit.</p>
<p>PEFC ST 1001, 4.5</p>	
<p>4.5a [Upon receipt of the complaint, the standard-setting body shall]: a) acknowledge receipt of the complaint to the complainant,</p>	
Procedures	<p>SAFAS 9, chapter 4.3 states that “the SAFAS Chairman shall without delay:</p> <ul style="list-style-type: none"> a) acknowledge to the complainant/ appellant (in writing) the receipt and acceptance/rejection of the complaint/ appeal, including its justification; b) provide the complainant/appellant with details of the SAFAS complaints and appeals procedures to ensure that they are clearly understood; c) refer the complainant/ appellant to other parties responsible for resolving the matter where the matter does not satisfy clause 1.1”. <p>Compliance: Conformity</p> <p>Justification: The referenced document satisfy the requirement.</p>
Process	<p>The applicant claims that no formal complaint has been received during standard setting process and that the standardisation body only responded to received questions relating to the standard setting process.</p> <p>Compliance: Conformity</p> <p>Justification: The applicant claim was verified based on feedback from the stakeholders' questionnaire and from the stakeholders interviews during the in-country visit.</p>
<p>4.5b [Upon receipt of the complaint, the standard-setting body shall]: b) gather and verify all necessary information to validate the complaint, impartially and objectively evaluate the subject matter of the complaint, and make a decision upon the complaint.</p>	
Procedures	<p>SAFAS 9, chapter 5.1 and 5.2 state that:</p> <p>“5.1 The SAFAS Chairperson shall assign an ad-hoc Complaints and Dispute Committee (the CDC), comprising one or more persons, to investigate the accepted complaint or appeal. The members of the CDC shall have no vested or conflict of interest in the complaint or appeal. Alternatively, in justified circumstances, the CDC may have balanced representation of concerned parties.</p> <p>5.2 The CDC shall undertake a thorough investigation and seek a resolution. The CDC shall submit in a timely matter, a detailed written report, to the SAFAS Chairperson to be presented to the Board of Directors. The report shall include a statement indicating whether, or not, the complaint or appeal has been substantiated and recommendations on resolving the complaint/ appeal”.</p> <p>Conclusion: Conformity</p> <p>Justification: The referenced document satisfy the requirement.</p>
Process	<p>The applicant claims that no formal complaint has been received during standard setting process and that the standardisation body only responded to received questions relating to the standard setting process.</p> <p>Compliance: Conformity</p>

	Justification: The applicant claim was verified based on feedback from the stakeholders' questionnaire and from the stakeholders interviews during the in-country visit.
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4.5 [Upon receipt of the complaint, the standard-setting body shall]: c) formally communicate the decision on the complaint and of the complaint handling process to the complainant.	
Procedures	<p>SAFAS 9, chapter 5.4 states that: "The Chairperson of SAFAS shall, without delay, inform the complainant/ appellant and other interested parties about the outcomes of the complaint/ appeal resolution process, in writing".</p> <p>Compliance: Conformity</p> <p>Justification: The referenced documents satisfy the requirement.</p>
Process	<p>The applicant claims that no formal complaint has been received during standard setting process and that the standardisation body only responded to received questions relating to the standard setting process.</p> <p>Compliance: Conformity</p> <p>Justification: The applicant claim was verified based on feedback from the stakeholders' questionnaire and from the stakeholders' interviews during the in-country visit.</p>

PEFC ST 1001, 4.6	
4.6 The standardising body shall establish at least one contact point for enquiries and complaints relating to its standard-setting activities. The contact point shall be made easily available.	
Procedures	<p>SAFAS 9, chapter 4.1 state that: "All complaints and appeals shall be addressed in writing to the SAFAS Council".</p> <p>Compliance: Conformity</p> <p>Justification: The referenced documents satisfy the requirement.</p>

PEFC ST 1001, 5.1	
5.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting work.	
Procedures	<p>SAFAS 2, chapter 6.1 states that: “The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting work.</p> <p>Note: A stakeholder mapping exercise that includes defining which interest sectors are relevant and why, and for each sector what are likely to be the key issues, who the key stakeholders are, and what means of communication will best reach them, is a recognised means of meeting the requirement”.</p> <p>Compliance: Conformity</p> <p>Justification: The document requires identification of stakeholders relevant to the standard setting.</p>
Process	<p>The applicant submitted two documents relevant to the stakeholders mapping:</p> <ol style="list-style-type: none"> Stakeholders mapping report^[8] outlining that the stakeholders mapping was carried out originally by the Government as a part of the PCIS development process and then updated by the SAFAS development process. The report also outlines key stakeholders categories, their prevailing interests, and key organisations for each category. Stakeholders list^[7] that includes 138 records of stakeholders (individuals and organisations) with their contact details and stakeholder category. The list includes stakeholders of the following categories: certification bodies, accreditation bodies, contractors, government (including local and provincial bodies), E-NGOs, trade unions, research organisations, etc. <p>Compliance: Conformity</p> <p>Justification: Stakeholders mapping report^[8] has been developed for the purposes of the PEFC endorsement. However, the stakeholders list^[7] satisfies the PEFC requirement for stakeholders mapping.</p>

PEFC ST 1001, 5.2	
5.2 The standardising body shall identify disadvantaged and key stakeholders. The standardising body shall address the constraints of their participation and proactively seek their participation and contribution in the standard-setting activities.	
Procedures	<p>SAFAS 2, chapter 6.2 states that: “The standardising body shall identify disadvantaged and key stakeholders. The standardising body shall address the constraints of their participation and proactively seek their participation and contribution in the standard-setting activities”.</p> <p>Compliance: Conformity</p> <p>Justification: SAFAS 2 includes the identical text as the PEFC requirement.</p>
Process	<p>The applicant submitted two documents relevant to the stakeholders mapping:</p> <ol style="list-style-type: none"> Stakeholders mapping report^[8] outlining that the stakeholders mapping was carried out originally by the Government as a part of the PCIS development process and then updated by the SAFAS development process. The report also outlines key stakeholders categories, their prevailing interests, and key organisations for each category.

	<p>b) Stakeholders list^[7] that includes 138 records of stakeholders (individuals and organisations with their contact details and stakeholder category. The list includes stakeholders of the following categories: certification bodies, accreditation bodies, contractors, government (including local and provincial bodies), E-NGOs, trade unions, trade unions, research organisations, etc.</p> <p>Compliance: Minor non-conformity</p> <p>Justification: The minor non-conformity has been assigned based on the following arguments:</p> <p>a) The stakeholders list^[7] does neither identify the key and disadvantaged stakeholders nor their constraints;</p> <p>b) The stakeholders mapping report^[8] list some stakeholders per each category and ways of communication towards them. This could be considered as an approach to identify “key” stakeholders. The document also identifies communities as “disadvantaged”. However, the document was developed after the completion of the standard setting process for the purposes of the PEFC endorsement rather than being available in the beginning of the SAFAS standard setting process.</p> <p>However, it should also be noted that the previous PCIS process identified and worked with a large number of stakeholders and those stakeholders were known to the SAFAS Council at the beginning of the process.</p> <p>In addition, the SAFAS Council amended its procedures (SAFAS 2, ch. 5.1) and included specific clauses relating to the identification of the key stakeholders prior the commencement of the standard setting process.</p>
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PEFC ST 1001, 5.3	
5.3 The standardising body shall make a public announcement of the start of the standard-setting process and include an invitation for participation in a timely manner on its website and in suitable media as appropriate to afford stakeholders an opportunity for meaningful contributions.	
Procedures	<p>SAFAS 2, chapter 6.3 states that: “The standardising body shall make a public announcement of the start of the standard-setting process and include an invitation for participation in a timely manner on its website and in suitable media as appropriate to afford stakeholders an opportunity for meaningful contributions”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>The announcement of the start of the SAFAS standard setting was made at the SAFAS, respectively at the Forestry South Africa’s website^[1] (14/7/2017). The deadline for submitting the nominations was set up on 24 July 2017.</p> <p>The invitation was also published at the following media:</p> <ul style="list-style-type: none"> - SA Forestry Online (17 July 2017) ^[3] - Forestry South Africa’s (FSA) Facebook (15 July 2017) ^[21] - Sawmilling South Africa Facebook (15 July 2017) ^[22] - Sawmilling South Africa website (17 July 2017) ^[23] <p>Invitation to nominate representative was also distributed by e-mail to:</p> <ul style="list-style-type: none"> - Forestry South Africa Environment Management Committee (mainly forestry industry representatives) ^[5];

	<ul style="list-style-type: none"> - A range of stakeholders^[6], including certification body, contractors, government, E-NGOs, consultants, forest owners, forest industry, labour unions, research. <p>Conclusion: Conformity</p> <p>Justification: SAFAS made public announcement of the start of the standard setting process and the announcement was also sent directly by e-mail to a broad range of stakeholders and as such reached all of the concerned stakeholder groups.</p> <p>Observation: The announcement was made only 10 days before the deadline for the submission of stakeholders' nominations. This period is considered as very limited to make decision on submission of their nomination. This is partially justifiable when considering the PCIS process that preceded the SAFAS standard setting process as the relevant stakeholders were already aware of the scope of the standard setting work.</p>
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PEFC ST 1001, 5.3	
5.3 [The announcement and invitation shall include:] a) information about the objectives, scope and the steps of the standard-setting process and its timetable	
Procedures	<p>SAFAS 2, chapter 6.3 states that: "The announcement and invitation shall include: (a) information about the objectives, scope and the steps of the standard-setting process and its timetable".</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>The text of the announcement^[9] published at the SAFAS / FSA website and distributed to stakeholders includes clear and comprehensive description of the objective, scope, steps and timetable of the announced process.</p> <p>Compliance: Conformity</p> <p>Justification: The announcement satisfies the requirement.</p>
5.3 [The announcement and invitation shall include:] b) information about opportunities for stakeholders to participate in the process	
Procedures	<p>SAFAS 2, chapter 6.3 states that: "The announcement and invitation shall include: (b) information about opportunities for stakeholders to participate in the process".</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>The text of the announcement^[9] published at the SAFAS / FSA website and distributed to stakeholders includes information on (i) where can stakeholders access the draft standard; (ii) planned consultation and (iii) invitation to join the Working Group.</p> <p>Compliance: Conformity</p> <p>Justification: The announcement satisfies the requirement.</p>

5.3 [The announcement and invitation shall include:] c) an invitation to stakeholders to nominate their representative(s) to the working group/committee. The invitation to disadvantaged and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is understandable,	
Procedures	<p>SAFAS 2, chapter 6.3 states that: "The announcement and invitation shall include: (c) an invitation to stakeholders to nominate their representative(s) to the Working Group / committee. The invitation to disadvantaged and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is understandable".</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>The text of the announcement^[9] published at the SAFAS / FSA website and distributed to stakeholders includes an invitation to join the Working Group.</p> <p>Invitation to nominate representative was distributed by e-mail to:</p> <ul style="list-style-type: none"> - Forestry South Africa Environment Management Committee (mainly forestry industry representatives) ^[5]; - A range of stakeholders^[6], including certification body, contractors, government, E-NGOs, consultants, forest owners, forest industry, labour unions, research. <p>Compliance: Conformity</p> <p>Justification: The text of the announcement satisfies the requirement.</p> <p>Although the SAFAS Council did not identified the key and disadvantaged stakeholders in the beginning of the process, the scale of the broad distribution of the emails^[5, 6] exceeds the PEFC requirement and ensures that most of identified stakeholders were covered by the direct communication.</p>
5.3 [The announcement and invitation shall include:] d) an invitation to comment on the scope and the standard-setting process	
Procedures	<p>SAFAS 2, chapter 6.3 states that: "The announcement and invitation shall include: d) an invitation to comment on the scope and the standard-setting process".</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>The text of the announcement^[9] published at the SAFAS / FSA website and distributed to stakeholders includes an invitation to comment on the presented standard setting process.</p> <p>Compliance: Conformity</p> <p>Justification: The text of the announcement satisfies the requirement.</p>

5.3 [The announcement and invitation shall include:] e) reference to publicly available standard-setting procedures.	
Procedures	<p>SAFAS 2, chapter 6.3 states that: "The announcement and invitation shall include: e) reference to publicly available standard-setting procedures."</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>The text of the announcement^[9] published at the SAFAS / FSA website and distributed to stakeholders includes a statement that "The complete standard setting process is outlined in the draft Standard Setting Procedures which will be available on the SAFAS web page from the 30th of July 2017".</p> <p>Compliance: Conformity</p> <p>Justification: The SAFAS website^[1, 2] includes the SAFAS standard setting procedures (SAFAS 2) and the announcement made reference to it.</p> <p>Observation: It should be noted that the purpose of the availability of the standard setting procedures is to help stakeholders in their decision on joining the standard setting process. As the deadline for the nominations was set up on 24 July 2017 they could not access the procedures at the website before their expected decision.</p> <p>On the other hand, the announcement made an explicit reference to the standard setting procedures and although they were not published at the time of the announcement, any interested party could ask for a copy directly to the SAFAS Council.</p>

PEFC ST 1001, 5.4	
5.4 The standardising body shall review the standard-setting process based on comments received from the public announcement and establish a working group/committee or adjust the composition of an already existing working group/committee based on received nominations. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the working group/committee and resources available for the standard-setting.	
Procedures	<p>SAFAS 2, chapter 6.4 states that: "The standardising body shall review the standard-setting process based on comments received from the public announcement and establish a working group/committee or adjust the composition of an already existing working group/committee based on received nominations. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the working group/committee and resources available for the standard-setting".</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>Review of the standard setting process</p> <p>The applicant provided a statement^[4] that after the announcement of the standard setting process it has received no comments to the presented standard setting process.</p> <p>Conclusion: Conformity</p> <p>Justification: The applicant's claim was verified based on feedback from the stakeholders' questionnaire and from the stakeholders' interviews during the in-country visit.</p>

	<p>Appointment of members of the Working Group</p> <p>The applicant provided a statement^[4] that it has accepted all nominations received (1). All other members of the Working Group continued from their previous work on the PCIS process. The applicant provided communication with the WG members at the time of the WG establishment^[10].</p> <p>Conclusion: Conformity</p> <p>Justification: The applicant's claim was verified based on feedback from the stakeholders' questionnaire and from the stakeholders' interviews during the in-country visit.</p> <p>It should be noted that one respondent in the stakeholders questionnaire indicated that his nomination to the WG has been rejected. Further communication with the respondent showed that he wanted to indicate that he was prepared to co-operate in the process even though he had not provided a formal nomination to the working group.</p>
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PEFC ST 1001, 5.5	
5.5 The work of the working group/committee shall be organised in an open and transparent manner where: a) working drafts shall be available to all members of the working group/committee,	
Procedures	<p>SAFAS 2, chapter 6.5 states that "the work of the working group/committee shall be organised in an open and transparent manner where: (a) working drafts shall be available to all members of the working group/committee".</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>Following the SAFAS 3, the WG worked from 28 July 2017 until 9 October 2017 when it made its final decision on recommendation for approval of the standard. During this period:</p> <ul style="list-style-type: none"> - The WG had one face-to-face meeting (2 October 2017); - The WG had an email exchange concerning the decision on sending the document for public consultation (26-31 July 2017)^[24] with references to the standard. - The WG had an e-mail exchange concerning the recommendation on the formal approval of the standard^[10], including references to the standard. <p>Conclusion: Conformity</p> <p>Justification: The e-mail communication^[10, 24] confirms that the WG members had access to the working drafts.</p>

5.5 The work of the working group/committee shall be organised in an open and transparent manner where: b) all members of the working group shall be provided with meaningful opportunities to contribute to the development or revision of the standard and submit comments to the working drafts	
Procedures	<p>SAFAS 2, chapter 6.5 states that “The work of the working group/committee shall be organised in an open and transparent manner where: b) all members of the working group shall be provided with meaningful opportunities to contribute to the development or revision of the standard and submit comments to the working drafts”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>Following the SAFAS 3, the WG worked from 28 July 2017 until 9 October 2017 when it made its final decision on approval of the standard. During this period:</p> <ul style="list-style-type: none"> - The WG had one face-to-face meeting (2 October 2017); - The WG had an email exchange concerning the decision on sending the document for public consultation (26-31 July 2017) ^[24] with references to the standard. - The WG had an e-mail exchange concerning the recommendation on the formal approval of the standard^[10], including references to the standard. <p>Conclusion: Conformity</p> <p>Justification: The work of the Working Group was extremely limited as it included only one meeting and two e-mail requests for decision making. The first decision to circulate the draft document for public consultation was even made before the Working Group was formally established.</p> <p>However, the conformity has been assigned based on the fact that the SAFAS standard setting process followed the PCIS process (2015/2016) and that a vast majority of the WG members were participating in the PCIS process.</p>

5.5 The work of the working group/committee shall be organised in an open and transparent manner where: c) comments and views submitted by any member of the working group/committee shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded.	
Procedures	<p>SAFAS 2, chapter 6.5 states that: “The work of the working group/committee shall be organised in an open and transparent manner where: c) comments and views submitted by any member of the working group/committee shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>Following the SAFAS 3, the WG worked from 28 July 2017 until 9 October 2017 when it made its final decision on approval of the standard. During this period:</p> <ul style="list-style-type: none"> - The WG had one face-to-face meeting (2 October 2017); - The WG had an email exchange concerning the decision on sending the document for public consultation (26-31 July 2017) ^[24], the meeting was recorded in minutes) ^[25].

	<ul style="list-style-type: none"> - The WG had an e-mail exchange concerning the recommendation on the formal approval of the standard^[10]. <p>Conclusion: Conformity</p> <p>Justification: The only meeting of the WG was recorded in the minutes.</p>
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PEFC ST 1001, 5.6	
5.6a [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] the start and the end of the public consultation is announced in a timely manner in suitable media	
Procedures	<p>SAFAS 2, chapter 6.6. states that: "[The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] the start and the end of the public consultation is announced in a timely manner in suitable media".</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>SAFAS 3 includes information that:</p> <ul style="list-style-type: none"> - The stakeholders consultation was announced on 31 July 2017 and lasted for 60 days, the announcement of the stakeholders consultation at the SAFAS / FSA website^[12] (28 July 2017) does not include information that the public consultation would last for 60 days. However, the end date of the public consultation is included in the announcement of the whole process that was published a few days earlier^[1] - The invitation to comment was sent out by email on 31 July 2017^[13], - An announcement of the public consultation was made at the SA Forestry Magazine on 8 August 2017, - The announcement was made on 28 September 2017 when the public consultation ended^[14]. <p>Compliance: Conformity</p> <p>Justification: The SAFAS Council announced the start of the public consultation in several media identified above.</p>

5.6b [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] the invitation of disadvantaged and key stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable	
Procedures	<p>SAFAS 2, chapter 6.6 states that: "[The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] the invitation of disadvantaged and key stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable".</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>The invitation to comment was sent out by email on 31 July 2017^[13]. The stakeholder mapping table^[7] includes information to whom was sent the invitation e-mail^[13].</p> <p>Compliance: Conformity</p> <p>Justification: The e-mail announcing the public communication was sent to a broad range of stakeholders, exceeding the requirement for key and disadvantaged stakeholders only. The e-mail communication to specific stakeholders ensures that the information reaches the targeted recipients. The e-mail communication was clear and understandable.</p>

5.6c [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] the enquiry draft is publicly available and accessible	
Procedures	<p>SAFAS 2, chapter 6.6 states that: [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] (c) the enquiry draft is publicly available and accessible".</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>The announcement of the stakeholders consultation at the SAFAS / FSA website^[12] (28 July 2017) and the invitation sent by email^[13] on 31 July 2017 include reference to the standard being available at the SAFAS/FSA website (http://www.forestry.co.za/safas/).</p> <p>Compliance: Conformity</p> <p>Justification: The draft standard was available at the applicant's website and was referenced in the announcement.</p>

5.6d [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] the public consultation is for at least 60 days	
Procedures	<p>SAFAS 2, chapter 6.6 states that: “[The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] (d) the public consultation is for at least 60 days”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>SAFAS 3 includes information that on 28 September 2017 the SAFAS Council made an announcement of the end of the public consultation.</p> <p>Compliance: Conformity</p> <p>Justification: Although the announcement of the start of the public consultation made at the SAFAS/FSA website^[12] and sent by email^[13] does not include an end date of the public consultation, the announcement on 28 September 2017^[15] provides evidence that the SAFAS Council ended the public consultation on 28 September 2017 and that the consultation lasted 60 days. In addition, the end date of the public consultation is included in the announcement of the whole process that was published a few days earlier^[1].</p>
5.6e [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] all comments received are considered by the working group/committee in an objective manner	
Procedures	<p>SAFAS 2, chapter 6.6 states that: “[The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] (e) all comments received are considered by the working group/committee in an objective manner”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>During the public consultation, nine (9) comments were received; six (6) of them expressed general support to the standard and three (3) provided specific comments to the requirements. The comments from the public consultation were considered by the Working Group at its meeting held on 2 October 2017.</p> <p>Both the comments as well as result of their consideration are recorded in a single document^[12].</p> <p>Compliance: Conformity</p> <p>Justification: The Working Group considered all received comments.</p> <p>Observation: Only very limited number of comments were received during the public consultation. Although the SAFAS Council made public announcement of the public consultation as required by the PEFC ST 1001, no additional events (such as seminars) were organised.</p> <p>On the other hand, it should be also noted that the SAFAS standard setting process followed the PCIS review process that took place during 2015 and 2016. This process also included stakeholders’ consultation^[16, 17] as well as three seminars for disadvantaged communities^[18].</p>

5.6f [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] a synopsis of received comments compiled from material issues, including the results of their consideration, is publicly available, for example on a website.	
Procedures	<p>SAFAS 2, chapter 6.6 states that: “[The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] (f) a synopsis of received comments compiled from material issues, including the results of their consideration, is publicly available, for example on a website”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>The document with comments from public consultation and with results of their consideration by the Working Group^[18] was published at the SAFAS/FSA website (http://www.forestry.co.za/safas/).</p> <p>Compliance: Conformity</p> <p>Justification: Received comments and their consideration were published.</p>

PEFC ST 1001, 5.7	
5.7 The standardising body shall organise pilot testing of the new standards and the results of the pilot testing shall be considered by the working group/committee.	
Procedures	<p>SAFAS 2, chapter 6.6 states that: “The standardising body shall organise pilot testing of the new standards and the results of the pilot testing shall be considered by the working group/committee”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>Based on SAFAS 3, the SAFAS Council commissioned a pilot testing that was carried out on 3-4 October 2017 and led by Mr Andries Badenhorst, an experienced lead auditor for ISO 9001, ISO 14001 as well FSC^[18].</p> <p>SAFAS 3 claims that the results of the testing were reported in a document called “TESTING SAFAS 2 2017” (also identified as D22). However, this document was not delivered for assessment.</p> <p>The comments from the testing were incorporated into a single document with comments from the public consultation^[15], provided to the WG and incorporated into the next version of the standard. The document^[15] was also made available at the SAFAS/FSA website.</p> <p>Conclusion: Conformity</p> <p>Justification: The members of the WG had access to the comments and suggestions from the pilot testing and accepted those by recommending the final draft for a formal approval.</p> <p>Observation: The document^[15] suggest that the findings of the testing were considered by the Working Group. However, the testing (3-4/10/2017) was carried out after the only WG meeting (2/10/2017). Therefore, it is not clear what procedures have been used by the WG to consider the findings before the document^[15] was published at the SAFAS/FSA website. Also the document combines comments from public consultation and the pilot testing. It would be more appropriate to develop a specific and comprehensive report on the pilot testing.</p>

PEFC ST 1001, 5.8	
<p>5.8 The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of a consensus.</p> <p>a) a face-to-face meeting where there is a verbal yes/no vote, show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc.,</p> <p>b) a telephone conference meeting where there is a verbal yes/no vote,</p> <p>c) an e-mail meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or</p> <p>d) combinations thereof.</p>	
Procedures	<p>SAFAS 2, chapter 6.8 states that “The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of a consensus. In order to reach a consensus, the working group/committee can utilise the following alternative processes to establish whether there is opposition:</p> <p>(a) a face-to-face meeting where there is a verbal yes/no vote, or show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc.,</p> <p>(b) a telephone conference meeting where there is a verbal yes/no vote,</p> <p>(c) an email meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or combinations thereof”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>The voting on the recommendation to formally approve the SAFAS Standard was done by a postal (email) ballot organised on 6th October 2017. All members (7) of the Working Group agreed with the final version of the Standard^[15].</p> <p>Conclusion: Conformity</p> <p>Justification: The Working Group reached consensus on the final draft of the Standard.</p>

PEFC ST 1001, 5.9	
<p>5.9 In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s):</p> <p>a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,</p> <p>b) direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise,</p> <p>c) dispute resolution process.</p>	
Procedures	<p>SAFAS 2, chapter 6.9 states that:</p> <p>“In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s):</p> <p>(a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,</p> <p>(b) direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise,</p> <p>(c) dispute resolution process”.</p> <p>Compliance: Conformity</p> <p>Justification: The wording satisfies the requirement.</p>
Process	<p>Conclusion: Conformity</p> <p>The WG was using a vote by e-mail with no negative vote, opposition or comments.</p>

PEFC ST 1001, 5.10	
<p>5.10 Documentation on the implementation of the standard-setting process shall be made publicly available.</p>	
Procedures	<p>SAFAS 2, chapter 6.10 states that “Documentation on the implementation of the standard-setting process shall be made publicly available”.</p> <p>Compliance: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>The standard setting process, including the PCIS review (2015/2016) and the SAFAS process itself is described in SAFAS 3 that was made publicly available at the SAFAS/FSA website (http://www.forestry.co.za/safas/).</p> <p>Compliance: Conformity</p> <p>Justification: Publication of SAFAS 3 satisfies the PEFC requirement.</p>

PEFC ST 1001, 5.11	
5.11 The standardising body shall formally approve the standards/normative documents based on evidence of consensus reached by the working group/committee.	
Procedures	<p>SAFAS 2, chapter 6.11 states that “The SAFAS Council shall formally approve the standards/normative documents based on evidence of consensus reached by the working group/committee”.</p> <p>Compliance: Conformity</p> <p>Justification: The wording satisfies the requirement.</p>
Process	<p>The SAFAS Standard was approved by members of the SAFAS Council on 6 October 2017^[20].</p> <p>Compliance: Conformity</p> <p>Justification: The SFM standard was formally approved by the Council for SFM.</p>

PEFC ST 1001, 5.12	
5.12 The formally approved standards/normative documents shall be published in a timely manner and made publicly available.	
Procedures	<p>SAFAS 2, chapter 6.12 states that “The formally approved standards/normative documents shall be published in a timely manner and made publicly available”.</p> <p>Compliance: Conformity</p> <p>Justification: SAFAS 2 is identical to the PEFC requirement.</p>
Process	<p>The SAFAS/FSA website (http://www.forestry.co.za/safas/) includes a complete documentation of the SAFAS scheme, including the SAFAS forest management standard (version 2018).</p> <p>Compliance: Conformity</p> <p>Justification: The SAFAS Council published the formally approved forest management standard.</p>

PEFC ST 1001, 6.1	
6.1 The standards/normative documents shall be reviewed and revised at intervals that do not exceed a five-year period. The procedures for the revision of the standards/normative documents shall follow those set out in chapter 5.	
Procedures	<p>SAFAS 2, chapter 7.1 states that “The standards/normative documents shall be reviewed and revised at intervals that do not exceed a 5-year period. The procedures for the revision of the standards/normative documents shall follow those set out in chapter 7. Pilot testing is not required for a revision where application of the standard can be seen as a substitute for testing”.</p> <p>Compliance: Conformity</p> <p>Justification: SAFAS 2 requires regular revision of the standard(s).</p>

	Observation: There is an error in references as the correct reference should be made to chapter 6. However, this error is clearly visible and recognisable and should not have effect on the correct application of the document.
Process	Not applicable. The assessment concerns the first edition of the SAFAS Standard.

PEFC ST 1001, 6.2	
6.2 The revision shall define the application date and transition date of the revised standards/normative documents.	
Procedures	SAFAS 2, chapter 7.2 states that “The revision shall define the application date and transition date of the revised standards/normative documents”. Compliance: Conformity Justification: SAFAS 2 is identical to the PEFC requirement.
Process	Not applicable. The assessment concerns the first edition of the SAFAS Standard.

PEFC ST 1001, 6.3	
6.3 The application date shall not exceed a period of one year from the publication of the standard. This is needed for the endorsement of the revised standards/normative documents, introducing the changes, information dissemination and training.	
Procedures	SAFAS 2, chapter 7.3 states that “The application date shall not exceed a period of one year from the publication of the standard. This is needed for the endorsement of the revised standards/normative documents, introducing the changes, information dissemination and training”. Compliance: Conformity Justification: SAFAS 2 is identical to the PEFC requirement.
Process	Not applicable. The assessment concerns the first edition of the SAFAS Standard.

PEFC ST 1001, 6.4	
6.4 The transition date shall not exceed a period of one year except in justified exceptional circumstances where the implementation of the revised standards/normative documents requires a longer period.	
Procedures	SAFAS 2, chapter 7.4 states that “The transition date shall not exceed a period of one year except in justified exceptional circumstances where the implementation of the revised standards/normative documents requires a longer period”. Compliance: Conformity Justification: SAFAS 2 is identical to the PEFC requirement.
Process	Not applicable. The assessment concerns the first edition of the SAFAS Standard.

Annex B: Detailed assessment of the group certification model

PEFC ST 1002, 4.1	
4.1 Does the forest certification scheme provide clear definitions for the following terms in conformity with the definitions of those terms presented in chapter 3 of PEFC ST 1002:2010:	
a) the group organisation,	<p>SAFAS 5, chapter 4.7:</p> <p>“Group Organization: A group of participants represented by the group entity for the purposes of implementation of the sustainable forest management standard and its certification. A contractual relationship needs to be established between a participant and the group entity”.</p> <p>Conclusion: Conformity</p> <p>Justification: The definition is identical to PEFC ST 1002.</p>
b) the group entity,	<p>SAFAS 5, chapter 4.3:</p> <p>“Group entity: An entity that represents the participants, with overall responsibility for ensuring the conformity of forest management in the certified area to the sustainable forest management standard and other applicable requirements of the forest certification scheme. The group entity may also be referred to as the applicant”.</p> <p>Conclusion: Conformity</p> <p>Justification: The definition complies with PEFC ST 1002.</p>
c) the participant,	<p>SAFAS 5, chapter 4.11:</p> <p>“The participant: A forest owner participating in group certification, another body possessing a right for making decisions on the forest management or any other entity belonging to a certification group, which complies with the standard requirements and implied by the certification system”.</p> <p>Conclusion: Conformity</p> <p>Justification: The definition is consistent with PEFC ST 1002.</p>
d) the certified area,	<p>SAFAS 5, chapter 4.1:</p> <p>“A total area of the certified forests. In the case of a group forest certificate it is the sum of forest areas of the participants”.</p> <p>Conclusion: Conformity</p> <p>Justification: The definition is identical to PEFC ST 1002.</p>

e) the group forest certificate	<p>SAFAS 5, chapter 4.4:</p> <p>“Group forest certificate: A document confirming that the group organisation complies with the requirements of the sustainable forest management standard and other applicable requirements of the forest certification scheme.”</p> <p>Conclusion: Conformity</p> <p>Justification: The definition is identical to PEFC ST 1002.</p>
f) the document confirming participation in group forest certification.	<p>SAFAS 5, chapter 4.4:</p> <p>“Document confirming participation in group forest certification: document issued to an individual participant that refers to the group forest certificate and that confirms the participant as being covered by the scope of the group forest certification.”.</p> <p>Conclusion: Conformity</p> <p>Justification: The definition is identical to PEFC ST 1002.</p>

PEFC ST 1002, 4.1.2	SAFAS 5, 8.10, 5.4.4
<p>4.1.2 In cases where a forest certification scheme allows an individual forest owner to be covered by additional group or individual forest management certifications, the scheme shall ensure that non-conformity by the forest owner identified under one forest management certification is addressed in any other forest management certification that covers the forest owner.</p>	<p>5.4.4 “[The certificate holder shall promptly submit the following information to the SAFAS Council for publishing]: Report annually on the results of an external audit including any documented non-conformities due to activities not complying with the criteria for certification”</p> <p>8.10 “Where an individual forest owner is covered by additional group or individual forest management certifications, a non-conformity by the forest owner identified under one forest management certification is addressed in any other forest management certification that covers the forest owner”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 5 satisfies the requirement. Information on non-conformities is collected by the SAFAS Council and published. As such the information is available and accessible to another group entity and certification body.</p> <p>Observation: The scheme requires to consider non-conformities from another certifications and provides a mechanism for collection and publication of such non-conformities. However, the implementation of 8.10 would be clearer if it is linked to chapter 5.4.4.</p>	

PEFC ST 1002, 4.1.3	SAFAS 5, 7.1
<p>4.1.3 The forest certification scheme shall define requirements for group forest certification which ensure that participants’ conformity with the sustainable forest management standard is centrally administered and is subject to central review and that all participants shall be subject to the internal monitoring programme.</p>	<p>“There shall be a group management system ensuring participants’ conformity with the sustainable forest management standard. It shall be centrally administered and subject to central review. All participants shall be subject to the internal monitoring programme”.</p>

Conclusion: Conformity

Justification: SAFAS 5 makes a reference to the group management system that includes review of participants conformity and internal monitoring programme.

PEFC ST 1002, 4.1.4	SAFAS 5
<p>4.1.4 The forest certification scheme shall define requirements for an annual internal monitoring programme that provides sufficient confidence in the conformity of the whole group organisation with the sustainable forest management standard.</p>	<p>“7.2 The group management system shall define the internal monitoring programme that provides sufficient confidence in the conformity of the whole group organisation with the sustainable forest management standard”.</p> <p>“8.8 [The group entity or the applicant is responsible...] To operate an annual internal monitoring programme that provides for the evaluation of the participants’ conformity with the certification requirements.</p> <p>10.1 Auditing frequency</p> <p>10.1.1 The group entity shall annually review the management system</p> <p>10.1.2 The participants will be selected for auditing on a sample basis. Sampling must be done in such a way as to select an audit sample that is representative of the entire group.</p> <p>10.1.3 The minimum sampling size for internal auditing is \sqrt{n}, n=total number of group members.</p> <p>10.1.4 Sampling may also be modified on the application of a risk assessment approach where prioritization according to risk can be objectively demonstrated”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 5 includes requirements for an annual internal monitoring system that is based on sampling methodology.</p>	

PEFC ST 1002, 4.2.1	SAFAS 5
<p>4.2.1 The forest certification scheme shall define the following requirements for the function and responsibility of the group entity:</p> <p>a) To represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body;</p>	<p>Chapter 8.1:</p> <p>[The group entity or applicant is responsible for the following]:</p> <p>“To represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 5 satisfies the requirement.</p>

<p>b) To provide a commitment on behalf of the whole group organisation to comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;</p>	<p>Chapter 8.2: [The group entity or applicant is responsible for the following]: “To provide a commitment on behalf of the whole group organisation to comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 5 satisfies the requirement.</p>
<p>c) To establish written procedures for the management of the group organisation;</p>	<p>Chapter 8.3: [The group entity or applicant is responsible for the following]: “To establish written procedures for the management of the group organization”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 5 satisfies the requirement.</p>
<p>d) To keep records of:</p> <ul style="list-style-type: none"> - the group entity and participants’ conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification scheme, - all participants, including their contact details, identification of their forest property and its/their size(s), - the certified area, - the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken; 	<p>Chapter 8.4: [The group entity or applicant is responsible for the following]: “To keep records of:</p> <ul style="list-style-type: none"> - the group entity and participants’ conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification scheme, - all participants, including their contact details, identification of their forest property and its/their size(s), - the certified area, - the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken”. <p>Conclusion: Conformity</p> <p>Justification: SAFAS 5 satisfies the requirement.</p>

<p>e) To establish connections with all participants based on a written agreement which shall include the participants' commitment to comply with the sustainable forest management standard. The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of non-conformity with the sustainable forest management standard;</p>	<p>Chapter 8.5: [The group entity or applicant is responsible for the following]: "To establish connections with all participants based on a written agreement which shall include the participants' commitment to comply with the sustainable forest management standard. The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of non-conformity with the sustainable forest management standard". Conclusion: Conformity Justification: SAFAS 5 satisfies the requirement.</p>
<p>f) To provide participants with a document confirming participation in the group forest certification;</p>	<p>Chapter 8.6: [The group entity or applicant is responsible for the following]: "To provide participants with a document confirming participation in the group forest certification". Conclusion: Conformity Justification: SAFAS 5 satisfies the requirement.</p>
<p>g) To provide all participants with information and guidance required for the effective implementation of the sustainable forest management standard and other applicable requirements of the forest certification scheme;</p>	<p>Chapter 8.7: [The group entity or applicant is responsible for the following]: "To provide all participants with information and guidance required for the effective implementation of the sustainable forest management standard and other applicable requirements of the forest certification scheme". Conclusion: Conformity Justification: SAFAS 5 satisfies the requirement.</p>
<p>h) To operate an annual internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements, and;</p>	<p>Chapter 8.8: [The group entity or applicant is responsible for the following]: "To operate an annual internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements". Conclusion: Conformity Justification: SAFAS 5 satisfies the requirement.</p>
<p>i) To operate a review of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme and the certification body's evaluations and surveillance; corrective</p>	<p>Chapter 8.9: [The group entity or applicant is responsible for the following]:</p>

and preventive measures if required; and the evaluation of the effectiveness of corrective actions taken.	<p>“To operate a review of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme and the certification body’s evaluations and surveillance; corrective and preventive measures if required; and the evaluation of the effectiveness of corrective actions taken”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 5 satisfies the requirement.</p>
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PEFC ST 1002	SAFAS 5
4.3.1 The forest certification scheme shall define the following requirements for the participants:	
a) To provide the group entity with a written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification scheme;	<p>Chapter 9.1:</p> <p>“To provide the group entity with a written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification scheme”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 5 satisfies the requirement.</p>
b) To comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;	<p>Chapter 9.2:</p> <p>“To comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 5 satisfies the requirement.</p>
c) To provide full co-operation and assistance in responding effectively to all requests from the group entity or certification body for relevant data, documentation or other information; allowing access to the forest and other facilities, whether in connection with formal audits or reviews or otherwise;	<p>Chapter 9.3:</p> <p>“To provide full co-operation and assistance in responding effectively to all requests from the group entity or certification body for relevant data, documentation or other information; allowing access to the forest and other facilities, whether in connection with formal audits or reviews or otherwise”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 5 satisfies the requirement.</p>

<p>d) To implement relevant corrective and preventive actions established by the group entity.</p>	<p>Chapter 9.4: “To implement relevant corrective and preventive actions established by the group entity”.</p> <p>Conclusion: Conformity</p> <p>Justification: SAFAS 5 satisfies the requirement.</p>
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Annex C: Detailed assessment of sustainable forest management standard

PEFC ST 1003, 4.1a	SAFAS 4
<p>4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall</p> <p>a) include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level.</p>	<p>The Standard includes both management system requirements (planning, monitoring, procedures, etc.) as well as specific performance requirements.</p>
<p>Conclusion: Conformity</p> <p>Justification: The document complies with the requirement.</p>	

PEFC ST 1003, 4.1b	SAFAS 4
<p>4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall</p> <p>b) be clear, objective-based and auditable.</p>	<p>The Standard includes clear, objective and auditable requirements that are supported by additional Verifiers and additional Guidance.</p> <p>Where a specific requirement is not sufficiently clear or objective, the fact is reported as a part of the specific requirement with the corresponding non-conformity or observation.</p>
<p>Conclusion: Conformity</p> <p>Justification: The document satisfies the requirement.</p>	

PEFC ST 1003, 4.1c	SAFAS 4
<p>4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall</p> <p>c) apply to activities of all operators in the defined forest area who have a measurable impact on achieving compliance with the requirements.</p>	<p>Chapter Scope states that “Certified organizations and contractors that work within certified forests must be assessed against all relevant indicators”.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard explicitly require compliance of certified entities as well as contractors.</p>	

PEFC ST 1003, 4.1d	SAFAS 4
<p>4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall</p> <p>d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards.</p>	<p>Chapter 1: “Forest managers and forest owners shall secure record-keeping procedures that provides evidence of compliance with the requirements of the forest management standards”.</p>
<p>Conclusion: conformity</p> <p>Justification: MK 03 includes a general requirement for records keeping that is identical with PEFC ST 1003.</p>	

PEFC ST 1003, 5.1.1	SAFAS 4
<p>5.1.1 Forest management planning shall aim to maintain or increase forests and other wooded areas and enhance the quality of the economic, ecological, cultural and social values of forest resources, including soil and water. This shall be done by making full use of related services and tools that support land-use planning and nature conservation.</p>	<p>Indicator 2.2.3 “The organization contributes to socio-economic development in the area where they operate”.</p> <p>Indicator 4.1.1 “Soil erosion is minimised through the use of harvesting and silviculture systems which are appropriate to the slope, soil sensitivity and weather.”</p> <p>Indicator 4.1.2 “Soil is protected through responsible residue management”.</p> <p>Indicator 4.1.4 “Eroded areas are rehabilitated and interventions monitored and adapted to ensure effectiveness and steps are taken to prevent soil erosion”.</p> <p>Indicator 4.2.1 “Wetlands and riparian areas are identified, delineated and protected from forestry impacts by adequate buffers of appropriate vegetation guided by the best available information”.</p> <p>Indicator 4.2.2 “Wetlands, riparian habitats* and their buffers are managed for maintenance or enhancement of ecosystem health and connectivity”.</p> <p>Indicator 4.3.1 “Annual harvest does not exceed the annual increment, or where this is exceeded it is justified and a plan of how any over-cutting is to be compensated for in future, is prepared”.</p> <p>Indicator 4.3.2</p>

	<p>“The growing stock (standing volume) of the FMU is maintained or increased over consecutive rotations, or where this is not achieved justification can be provided”.</p> <p>Indicator 5.3.1</p> <p>“Best Available Information* is used to identify native ecosystems”.</p> <p>Indicator 5.3.2</p> <p>“The presence or likely presence of Priority Species* and their habitats occurring within and adjacent to the FMU is assessed using the best available information”.</p> <p>Indicator 5.3.3</p> <p>“The presence or likely presence of listed threatened or protected, species and their habitats occurring within and adjacent to the FMU is assessed using the best available information”.</p> <p>Indicator 5.3.4</p> <p>“Priority species are being managed and monitored according to best available information”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes a number of requirements relating to maintenance of forest resources (4.3) and enhancement its economic (7), cultural (2.2) and environmental (5.3) values, including water resources (4.2) and soil (4.1).</p>	

PEFC ST 1003, 5.1.2	SAFAS 4
<p>5.1.2 Forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management operations. This shall form a basis for a cycle of continuous improvement to minimise or avoid negative impacts.</p>	<p>Indicator 1.1.4</p> <p>“Prior to any listed site disturbing activities*, environmental impact assessments as required by legislation shall be undertaken for any developments on the FMU and records of decision complied with”.</p> <p>Indicator 1.2.1</p> <p>“The management plan* and plantation map addresses the operational requirements of the FMU and is consistent with the organizations policies and broader management objectives”.</p> <p>Indicator 1.2.2</p> <p>“The management plan* is reviewed annually and where necessary where updated to incorporate;</p> <ol style="list-style-type: none"> 1) Monitoring results; including results of certification audits. 2) Inputs from stakeholder engagement. 3) New scientific or technical information

	<p>4) Changing environmental, social or economic circumstances.”</p> <p>Indicator 5.1.1 “Operations are planned and managed to prevent adverse off-site environmental impacts, including impacts to neighbouring communities and other stakeholders”.</p> <p>Indicator 5.2.1 “The organization has determined if the species they intend to grow or are growing are known to be invasive, and if so have appraised the landscape for signs that these may be a source of invasion”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 does not explicitly require the continuous improvement cycle as required by the PEFC requirement. However, its requirements for regular review of forest management plans, taking into account the monitoring results and other aspects (1.2.2) satisfies the objective of the requirement. Indicators 1.1.4 and 5.1.1 requires to prevent adverse environmental and social impacts.</p>	

PEFC ST 1003, 5.1.3	SAFAS 4
<p>5.1.3 Inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the topics described in this document.</p>	<p>Indicator 1.1.2 “On title deed land maps must be available indicating the FMU boundaries. Within Traditional Authority lands, in the absence of maps, the boundary of individual woodlots within a TA. or landscape can be identifiable by infield demarcation (e.g. beacons) or through recognition of boundaries by traditional leaders, neighbours and other members of the community”.</p> <p>Indicator 1.2.1 “The management plan* and plantation map addresses the operational requirements of the FMU and is consistent with the organizations policies and broader management objectives”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 clear identification of the FMU, forest management plan and maps. Content of the plans (1.2.1) includes description of the FMU that is consistent with the objective of the term “inventory”.</p>	

PEFC ST 1003, 5.1.4	SAFAS 4
<p>5.1.4 Management plans or their equivalents, appropriate to the size and use of the forest area, shall be elaborated and periodically updated. They shall be based on legislation as well as existing land-use plans, and adequately cover the forest resources.</p>	<p>Indicator 1.1.1 “Plantations are established in accordance with; 1) Applicable laws* and regulations and administrative requirements, 2) Legal* and customary rights”.</p> <p>Indicator 1.1.3 “There shall be no substantiated outstanding claims of legal non-compliance related to plantation management raised by regulatory authorities”.</p> <p>Indicator 1.2.1 “The management plan* and plantation map addresses the operational requirements of the FMU and is consistent with the organizations policies and broader management objectives”.</p> <p>Indicator 1.2.2 “The management plan* is reviewed annually and where necessary where updated to incorporate; 1) Monitoring results; including results of certification audits. 2) Inputs from stakeholder engagement. 3) New scientific or technical information 4) Changing environmental, social or economic circumstances.”</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS requires forest management plans and their annual review. Although it does not explicitly references legislation and land-use planning in connection with the planning, SAFAS 4 (1.1.1, 1.1.3) requires general compliance with legislation.</p>	

PEFC ST 1003, 5.1.5	SAFAS 4
<p>5.1.5 Management plans or their equivalents shall include at least a description of the current condition of the forest management unit, long-term objectives; and the average annual allowable cut, including its justification and, where relevant, the annually allowable exploitation of non-timber forest products.</p>	<p>Indicator 1.2.1 “The management plan* and plantation map addresses the operational requirements of the FMU and is consistent with the organizations policies and broader management objectives</p> <p>The key elements of a management plan are as follows: a. management objectives with verifiable targets where these are possible; b. description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands; c. description of silvicultural and/or other management system;</p>

	<p>d. rationale for rate of annual harvest and species selection;</p> <p>e. provisions for monitoring of forest growth and dynamics;</p> <p>f. environmental safeguards based on environmental assessments;</p> <p>g. plans for the identification and protection of rare, threatened and endangered species;</p> <p>h. maps describing the forest resource base including protected areas, planned management activities and land ownership;</p> <p>i. description and justification of harvesting techniques and equipment to be used.</p> <p>j. requirements of national legislation”.</p> <p>Indicator 7.1.1</p> <p>“For commercial use of non-timber forest products from natural areas under the organization’s* control, a sustainable harvest level is calculated and adhered to. Sustainable harvest levels are based on Best Available Information”.</p> <p>Indicator 7.2.1</p> <p>“Harvested timber areas are re-established within a year of felling unless the area is being rehabilitated to natural vegetation for ecological reasons”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes explicit requirement (1.2.1) for the content of the forest management plan.</p>	

PEFC ST 1003, 5.1.6	SAFAS 4
<p>5.1.6 A summary of the forest management plan or its equivalent appropriate to the scope and scale of forest management, which contains information about the forest management measures to be applied, is publicly available. The summary may exclude confidential business and personal information and other information made confidential by national legislation or for the protection of cultural sites or sensitive natural resource features.</p>	<p>Indicator 1.2.3</p> <p>“A summary of the management plan* in a format comprehensible to stakeholders including maps and excluding confidential information* is made available to the public on request at no cost”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires the summary of forest management plan to be public.</p>	

PEFC ST 1003, 5.1.7	SAFAS 4
5.1.7 Monitoring of forest resources and evaluation of their management shall be periodically performed, and results fed back into the planning process.	<p>Indicator 1.2.2</p> <p>“The management plan* is reviewed annually and where necessary where updated to incorporate; 1) Monitoring results; including results of certification audits...”.</p> <p>Specific monitoring activities are defined under indicators 2.2.4, 4.1.2, 4.1.4, 5.2.3, 5.3.4, 5.3.5, 5.3.6, 5.3.7. 6.4. 7.2.3, 7.2.5.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes references to monitoring in connection with review of the forest management plan (1.2.2) and additional requirements. The standard does not define periodicity of the monitoring activities. However, the fact that monitoring feeds into the annual review of the management plan (1.2.2) implicitly also define the annual monitoring activities.</p>	

PEFC ST 1003, 5.1.8	SAFAS 4
5.1.8 Responsibilities for sustainable forest management shall be clearly defined and assigned.	<p>Indicator 7.2.8</p> <p>“Responsibilities for sustainable forest management are clearly defined and assigned”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 satisfies the requirement.</p>	

PEFC ST 1003, 5.1.9	SAFAS 4
5.1.9 Forest management practices shall safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates, and by preferring techniques that minimise direct or indirect damage to forest, soil or water resources.	<p>Indicator 4.1.1</p> <p>“Soil erosion is minimised through the use of harvesting and silviculture systems which are appropriate to the slope, soil sensitivity and weather”.</p> <p>Indicator 4.1.2</p> <p>“Soil is protected through responsible residue management”.</p> <p>Indicator 4.1.3</p> <p>“Development, maintenance and use of infrastructure*, as well as transport activities, are managed to protect environmental values* and withstand the impacts of flooding”.</p> <p>Indicator 4.1.4</p> <p>“Eroded areas are rehabilitated and interventions monitored and adapted to ensure</p>

	<p>effectiveness and steps are taken to prevent soil erosion”.</p> <p>Indicator 4.3.4 “Steps taken to improve soil carbon stocks”.</p> <p>Indicator 4.2.1 “Wetlands and riparian areas are identified, delineated and protected from forestry impacts by adequate buffers of appropriate vegetation guided by the best available information”.</p> <p>Indicator 4.2.3 “Safeguards to protect wetlands and riparian habitats* from the impacts of forestry activities are implemented”.</p> <p>Indicator 4.3.1 “Annual harvest does not exceed the annual increment, or where this is exceeded it is justified and a plan of how any over-cutting is to be compensated for in future, is prepared”.</p> <p>Indicator 7.1.1 “For commercial use of non-timber forest products from natural areas under the organization’s* control, a sustainable harvest level is calculated and adhered to. Sustainable harvest levels are based on Best Available Information**”.</p> <p>Indicator 7.2.1 “Harvested timber areas are re-established within a year of felling unless the area is being rehabilitated to natural vegetation for ecological reasons”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirements ensuring sustainable harvest (7.1.1 and 7.2.1); requirements for soil protection (4.1.1 – 4.1.4, 4.3.4); and requirements for water protection (4.2.1, 4.2.3, 4.3.1).</p>	

PEFC ST 1003, 5.1.10	SAFAS 4
<p>5.1.10 Appropriate silvicultural measures shall be taken to maintain or reach a level of the growing stock that is economically, ecologically and socially desirable.</p>	<p>Indicator 4.3.2 “The growing stock (standing volume) of the FMU is maintained or increased over consecutive rotations, or where this is not achieved justification can be provided”.</p> <p>Indicator 7.2.1 “Harvested timber areas are re-established within a year of felling unless the area is being rehabilitated to natural vegetation for ecological reasons”.</p>

	<p>Indicator 7.2.4</p> <p>“Where there is evidence of a loss of productivity over successive rotations that can be attributed to reduction in site quality action is taken to restore site quality”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires to maintain sustainable growing stock (4.3.2) as well as protection of economic (7.2), ecological (4.x) and social interests (6.x).</p>	

PEFC ST 1003, 5.1.11	SAFAS 4
<p>5.1.11 Conversion of forests to other types of land use, including conversion of primary forests to forest plantations, shall not occur unless in justified circumstances where the conversion:</p> <p>a) is in compliance with national and regional policy and legislation relevant for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with materially and directly interested persons and organisations; and</p> <p>b) entails a small proportion of forest type; and</p> <p>c) does not have negative impacts on threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and</p> <p>d) makes a contribution to long-term conservation, economic, and social benefits.</p>	<p>Indicator 5.3.9</p> <p>“Plantations established on land converted from natural forests after 1972 will not be eligible for certification.</p> <p>Conversion of plantations to other types of land use, shall not occur unless in justified circumstances where the conversion:</p> <p>a) is in compliance with national and regional policy and legislation relevant for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with materially and directly interested persons and organisations; and</p> <p>b) entails less than 10 % of a landscape</p> <p>c) does not have negative impacts on threatened (including vulnerable, rare or endangered) ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and</p> <p>d) makes a contribution to long-term conservation, economic, and social benefits”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 uses similar text as PEFC ST 1003. The extent of “justifiable conversion” (bullet point b) is defined as 10 % of the landscape. Taking into account the fact that all plantations in South Africa have been established on agriculture land rather than by converting native forests, this requirement is justifiable. In addition, the reference to the landscape level and the objective of preserving forest plantations cover at the landscape level (rather than FMU level) is more practical and appropriate in case of small forest owners and farmers.</p>	

PEFC ST 1003, 5.1.12	SAFAS 4
5.1.12 Conversion of abandoned agricultural and treeless land into forest land shall be taken into consideration, whenever it can add economic, ecological, social and/or cultural value.	Indicator 1.1.1 “Plantations are established in accordance with; 1) Applicable laws* and regulations and administrative requirements, 2) Legal* and customary rights”.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires compliance with legislation when establishing plantations. It should be noted that plantations in South Africa are in principle established on agriculture or other abandoned land and as such the objective of 5.1.12 is met.</p>	

PEFC ST 1003, 5.2.1	SAFAS 4
5.2.1 Forest management planning shall aim to maintain and increase the health and vitality of forest ecosystems and to rehabilitate degraded forest ecosystems, whenever this is possible by silvicultural means.	<p>Indicator 6.2.4 “Integrated pest management, including silvicultural* systems, lead to more efficient use of chemicals”.</p> <p>Criterion 6.3 Includes requirements relating to fire protection.</p> <p>Criterion 6.4 includes requirements relating to monitoring and control of pests and diseases and damages by animals.</p> <p>Indicator 5.3.1 “Best Available Information* is used to identify native ecosystems”.</p> <p>Indicator 5.3.2 “At least 10% of the certified area is comprised of representative sample areas* of native ecosystems* which are prioritized according to conservation value and protected”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirements for integrated pests management (6.2.4 and other requirements of 6.2), fire protection (6.3), monitoring/control of pests, diseases and damages by animals (6.4), and protection of natural ecosystems (5.3.2).</p> <p>The requirement for rehabilitation of degraded forest ecosystems in case of short-term forest plantations established on agriculture land is not applicable. Those areas that include native ecosystems are identified, prioritised and protected to avoid their degradation (5.3.1, 5.3.2).</p>	

PEFC ST 1003, 5.2.2	SAFAS 4
<p>5.2.2 Health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.</p>	<p>Indicator 6.2.4 “Integrated pest management, including silvicultural* systems, lead to more efficient use of chemicals”.</p> <p>Indicator 6.3.1 “Records of past uncontrolled fires are kept and trends examined”.</p> <p>Indicator 6.4.1 “Managers inspect plantations for evidence of ill-health and damage and take appropriate action. The frequency of inspections shall be determined by the specific pests and environmental factors”.</p> <p>Indicator 6.4.2 “New outbreaks and spread of specified pests and disease are reported to the relevant authority or organization“.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes comprehensive requirements for integrated pests’ management programme (6.2.4), for monitoring of forest fires (6.3.1) and other pests and diseases (6.4.1, 6.4.2). SAFAS 4 requires the mangers to specify frequency of inspections (monitoring) for each pests and environmental factor (6.4.1).</p>	

PEFC ST 1003, 5.2.3	SAFAS 4
<p>5.2.3 The monitoring and maintaining of health and vitality of forest ecosystems shall take into consideration the effects of naturally occurring fire, pests and other disturbances.</p>	<p>Indicator 6.2.4 “Integrated pest management, including silvicultural* systems,lead to more efficient use of chemicals”.</p> <p>Indicator 6.3.1 “Records of past uncontrolled fires are kept and trends examined”.</p> <p>Indicator 6.4.1 “Managers inspect plantations for evidence of ill-health and damage and take appropriate action. The frequency of inspections shall be determined by the specific pests and environmental factors”.</p> <p>Indicator 6.4.2 “New outbreaks and spread of specified pests and disease are reported to the relevant authority or organization“.</p>
<p>Conclusion: Conformity</p>	

Justification: SAFAS 4 includes comprehensive requirements for integrated pest management programme (6.2.4), for monitoring of forest fires (6.3.1) and other pests and diseases (6.4.1, 6.4.2). This also covers consideration of naturally occurring fire, pests and other disturbances.

PEFC ST 1003, 5.2.4	SAFAS 4
<p>5.2.4 Forest management plans or their equivalents shall specify ways and means to minimise the risk of degradation of and damages to forest ecosystems. Forest management planning shall make use of those policy instruments set up to support these activities.</p>	<p>Indicator 5.2.1 “The organization has determined if the species they intend to grow or are growing are known to be invasive, and if so have appraised the landscape for signs that these may be a source of invasion”.</p> <p>Indicator 5.2.2 “Where 5.2.1 is relevant then the organization is taking steps towards reducing the invasiveness of their plantations”.</p> <p>Indicator 5.3.1 “Best Available Information* is used to identify native ecosystems”.</p> <p>Indicator 5.3.2 “At least 10% of the certified area is comprised of representative sample areas* of native ecosystems* which are prioritized according to conservation value and protected”.</p> <p>Indicator 5.3.5 “A fire management plan for natural ecosystems guided by the best available information is implemented”.</p> <p>Indicator 5.3.6 “A programme to control and eradicate listed invasive species is implemented”.</p> <p>Indicator 5.3.7 “Grazing by livestock and wildlife populations shall be managed to prevent degradation of the natural habitat”.</p> <p>Criterion 6.3 Includes requirements relating to fire protection.</p> <p>Criterion 6.4 includes requirements relating to monitoring and control of pests and diseases and damages by animals.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes numerous requirements relating to mitigation of risk of forest ecosystems degradation, including control of invasive species (5.2, 5.3.6), control of fires (5.3.5, 6.3), control of grazing (5.3.7), control of pests and diseases (6.2.4, 6.4) and protection on native ecosystems (5.3.1 and 5.3.2).</p>	

PEFC ST 1003, 5.2.5	SAFAS 4
<p>5.2.5 Forest management practices shall make best use of natural structures and processes and use preventive biological measures wherever and as far as economically feasible to maintain and enhance the health and vitality of forests. Adequate genetic, species and structural diversity shall be encouraged and/or maintained to enhance the stability, vitality and resistance capacity of the forests to adverse environmental factors and strengthen natural regulation mechanisms.</p>	<p>Indicator 6.2.4 “Integrated pest management, including silvicultural* systems, lead to more efficient use of chemicals”.</p> <p>Indicator 5.3.2 “At least 10% of the certified area is comprised of representative sample areas* of native ecosystems* which are prioritized according to conservation value and protected”.</p>
<p>Conclusion: Minor non-conformity</p> <p>Justification: SAFAS 4 requires the integrated pest management to ensure health and vitality of forests plantations.</p> <p>PEFC ST 1003 recognises in Appendix 1 that the use of natural structures and processes, and genetic, species and structural diversity cannot be achieved in plantation forestry and that those functions are to be ensured by “set-aside” areas. This approach is satisfied by SAFAS 4 as it requires protection of certain habitats (wetlands, natural forests, etc.) and requires to set aside at least 10 % of the certified area (5.3.2).</p>	

PEFC ST 1003, 5.2.6	SAFAS 4
<p>5.2.6 Lighting of fires shall be avoided and is only permitted if it is necessary for the achievement of the management goals of the forest management unit.</p>	<p>Indicator 6.3.2 “There is a comprehensive fire risk management strategy that is implemented”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires a comprehensive risk management strategy (6.3.2) and includes a number of requirements relating to control of fires.</p>	

PEFC ST 1003, 5.2.7	SAFAS 4
<p>5.2.7 Appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied. The spillage of oil during forest management operations or the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be avoided, collected, stored in designated areas and removed in an environmentally-responsible manner.</p>	<p>Indicator 4.1.1 “Soil erosion is minimised through the use of harvesting and silviculture systems which are appropriate to the slope, soil sensitivity and weather”.</p> <p>Indicator 4.1.2 “Soil is protected through responsible residue management”.</p> <p>Indicator 7.2.2 “There is a clear justification for the choice of species and genotypes chosen for the plantation, which takes into account the objectives of the plantation, and the climate, geology and soils at the planting sites”.</p> <p>Indicator 6.2.1 “Storage of hazardous materials and chemicals (including all fuels, pesticides, herbicides and fertilisers) is in accordance with legislation and best practice”.</p> <p>Indicator 6.2.2 “Waste disposal sites on the FMU comply with national legislation and local by-laws and are managed according to industry best practice guidelines. Hazardous waste is only disposed of at sites registered for the disposal of hazardous waste”.</p> <p>Indicator 6.2.3 “Measures shall be taken to prevent chemical and hydrocarbon pollution and remediate areas in the event of spillage”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires the use of suitable species (7.2.2), waste management (6.2.2) protection against chemical/hydrocarbon pollution (6.2.3) and measures to protect soil (4.1.1).</p> <p>The standard does not include requirements relating to minimisation of tree damages during harvesting and transportation. However, this is justifiable as the plantation forestry is based on clear-felling of whole compartments and the risk of damages to remaining trees (other compartments) is negligible.</p>	

PEFC ST 1003, 5.2.8	SAFAS 4
<p>5.2.8 The use of pesticides shall be minimised and appropriate silvicultural alternatives and other biological measures preferred.</p>	<p>Indicator 6.2.4 “Integrated pest management, including silvicultural* systems, lead to more efficient use of chemicals”.</p> <p>Indicator 6.2.5 “The following groups of pesticides are prohibited: a) WHO Type 1A and 1B pesticides and other highly toxic pesticides, b) Chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use. c) Pesticides banned by international agreement Note: “pesticides banned by international agreements” are defined in the Stockholm Convention on Persistent Organic Pollutants 2001, as amended”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 does not explicitly require minimisation of the usage of pesticides. However, the conformity has been assigned based on the fact that the standard requires the integrated pest management as a mean to the efficient use of chemicals and thus minimisation of their usage.</p>	

PEFC ST 1003, 5.2.9	SAFAS 4
<p>5.2.9 The WHO Type 1A and 1B pesticides and other highly toxic pesticides shall be prohibited, except where no other viable alternative is available.</p>	<p>Indicator 6.2.5 “The following groups of pesticides are prohibited: a) WHO Type 1A and 1B pesticides and other highly toxic pesticides, b) Chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use. c) Pesticides banned by international agreement Note: “pesticides banned by international agreements” are defined in the Stockholm Convention on Persistent Organic Pollutants 2001, as amended”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS prohibits the use of the WHO 1A, 1B pesticides and other toxic pesticides.</p>	

PEFC ST 1003, 5.2.10	SAFAS 4
5.2.10 Pesticides, such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.	<p>Indicator 6.2.5</p> <p>“The following groups of pesticides are prohibited:</p> <p>a) WHO Type 1A and 1B pesticides and other highly toxic pesticides,</p> <p>b) Chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use.</p> <p>c) Pesticides banned by international agreement</p> <p>Note: “pesticides banned by international agreements” are defined in the Stockholm Convention on Persistent Organic Pollutants 2001, as amended”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS prohibits chlorinated hydrocarbons and pesticides banned by international agreement (the Stockholm Convention).</p>	

PEFC ST 1003, 5.2.11	SAFAS 4
5.2.11 The use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.	<p>Indicator 6.2.6</p> <p>“The use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 satisfies the requirement for proper use of pesticides.</p>	

PEFC ST 1003, 5.2.12	SAFAS 4
5.2.12 Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment.	<p>Indicator 6.2.8</p> <p>“Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirements for controlled use of fertilisers.</p>	

PEFC ST 1003, 5.3.1	SAFAS 4
<p>5.3.1 Forest management planning shall aim to maintain the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis.</p>	<p>Indicator 7.1.1 “For commercial use of non-timber forest products from natural areas under the organization’s* control, a sustainable harvest level is calculated and adhered to. Sustainable harvest levels are based on Best Available Information”</p> <p>Indicator 7.1.2 “The range of resources and ecosystem services* on the FMU and the potential benefits to local communities are known by management”.</p> <p>Indicator 7.1.3 “The organization diversifies the range of products and services produced on the FMU where this is beneficial to the sustainability of the operation and the community”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirements for sustainable production of wood and non-wood forest products.</p>	

PEFC ST 1003, 5.3.2	SAFAS 4
<p>5.3.2 Forest management planning shall aim to achieve sound economic performance taking into account any available market studies and possibilities for new markets and economic activities in connection with all relevant goods and services of forests.</p>	<p>Indicator 7.1.3 “The organization diversifies the range of products and services produced on the FMU where this is beneficial to the sustainability of the operation and the community”.</p> <p>Indicator 7.2.1 “Harvested timber areas are re-established within a year of felling unless the area is being rehabilitated to natural vegetation for ecological reasons”.</p> <p>Indicator 7.2.2 “There is a clear justification for the choice of species and genotypes chosen for the plantation, which takes into account the objectives of the plantation, and the climate, geology and soils at the planting sites”.</p> <p>Indicator 7.2.3 “Aspects important to plantation productivity are monitored”.</p> <p>Indicator 7.2.4 “Where there is evidence of a loss of productivity over successive rotations that can</p>

	<p>be attributed to reduction in site quality action is taken to restore site quality”.</p> <p>Indicator 7.2.5</p> <p>“The drivers of the costs of production must be understood and relevant aspects monitored including; labour efficiency, productivity of machinery”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirements relating to the economic performance (7.2) and to diversification of production (7.1.3).</p>	

PEFC ST 1003, 5.3.3	SAFAS 4
<p>5.3.3 Forest management plans or their equivalents shall take into account the different uses or functions of the managed forest area. Forest management planning shall make use of those policy instruments set up to support the production of commercial and non-commercial forest goods and services.</p>	<p>Indicator 7.1.1</p> <p>“For commercial use of non-timber forest products from natural areas under the organization’s* control, a sustainable harvest level is calculated and adhered to. Sustainable harvest levels are based on Best Available Information”</p> <p>Indicator 7.1.2</p> <p>“The range of resources and ecosystem services* on the FMU and the potential benefits to local communities are known by management”.</p> <p>Indicator 7.1.3</p> <p>“The organization diversifies the range of products and services produced on the FMU where this is beneficial to the sustainability of the operation and the community”.</p> <p>SAFAS makes numerous references to the adherence to legislation as the main policy instrument relating to the establishment and management of forest plantations. SAFAS also defines and uses the concept of “Best available information” (see chapter definition) that can also be considered as the policy instrument shared amongst the forest practitioners, government and other forest related bodies.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirements for different functions of forests (7.1.2) and commercial production (7.2, 7.1.2) and diversification of production (7.1.3).</p>	

PEFC ST 1003, 5.3.4	SAFAS 4
<p>5.3.4 Forest management practices shall maintain and improve the forest resources and</p>	<p>Indicator 7.1.2</p> <p>“The range of resources and ecosystem services* on the FMU and the potential benefits</p>

<p>encourage a diversified output of goods and services over the long term.</p>	<p>to local communities are known by management”.</p> <p>Indicator 7.1.3 “The organization diversifies the range of products and services produced on the FMU where this is beneficial to the sustainability of the operation and the community”.</p> <p>Indicator 7.2.2 “There is a clear justification for the choice of species and genotypes chosen for the plantation, which takes into account the objectives of the plantation, and the climate, geology and soils at the planting sites”.</p> <p>Indicator 7.2.7 “Forestry operations make provision for diversification and resilience”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirements relating to the improvement of forest resources (the whole standard, 7.2.2) and for diversification of production (7.1.2, 7.1.3, 7.2.7).</p>	

PEFC ST 1003, 5.3.5	SAFAS 4
<p>5.3.5 Regeneration, tending and harvesting operations shall be carried out in time, and in a way that does not reduce the productive capacity of the site, for example by avoiding damage to retained stands and trees as well as to the forest soil, and by using appropriate systems.</p>	<p>Indicator 7.2.1 “Harvested timber areas are re-established within a year of felling unless the area is being rehabilitated to natural vegetation for ecological reasons”.</p> <p>Indicator 7.2.4 “Where there is evidence of a loss of productivity over successive rotations that can be attributed to reduction in site quality action is taken to restore site quality”.</p> <p>Indicator 4.1.1 “Soil erosion is minimised through the use of harvesting and silviculture systems which are appropriate to the slope, soil sensitivity and weather”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirement to regeneration carried out in-time (7.2.1), control of soil productivity (7.2.4) and protection of soil (4.1.1).</p> <p>The standard does not include requirements relating to minimisation of tree damages during harvesting and transportation. However, this is justifiable as the plantation forestry is based on clear-felling of whole compartments and the risk of damages to remaining trees (other compartments) is negligible.</p>	

PEFC ST 1003, 5.3.6	SAFAS 4
<p>5.3.6 Harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested forest products, with due regard to nutrient off-take.</p>	<p>Indicator 4.3.1 “Annual harvest does not exceed the annual increment, or where this is exceeded it is justified and a plan of how any over-cutting is to be compensated for in future, is prepared”.</p> <p>Indicator 7.1.1 “For commercial use of non-timber forest products from natural areas under the organization’s* control, a sustainable harvest level is calculated and adhered to. Sustainable harvest levels are based on Best Available Information”.</p> <p>Indicator 7.2.1 “Harvested timber areas are re-established within a year of felling unless the area is being rehabilitated to natural vegetation for ecological reasons”.</p> <p>Indicator 7.2.4 “Where there is evidence of a loss of productivity over successive rotations that can be attributed to reduction in site quality action is taken to restore site quality”.</p>
<p>Conclusion: conformity</p> <p>Justification: SAFAS 4 includes requirements for sustainable production for both wood products (4.3.1, 7.2.1) as well as non-wood products (7.1.1) and for control of soil productivity (7.2.4).</p>	

PEFC ST 1003, 5.3.7	SAFAS 4
<p>5.3.7 Where it is the responsibility of the forest owner/manager and included in forest management, the exploitation of non-timber forest products, including hunting and fishing, shall be regulated, monitored and controlled.</p>	<p>Indicator 7.1.1 “For commercial use of non-timber forest products from natural areas under the organization’s* control, a sustainable harvest level is calculated and adhered to. Sustainable harvest levels are based on Best Available Information”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirements for control of commercial use of non-wood forest products.</p>	

PEFC ST 1003, 5.3.8	SAFAS 4
5.3.8 Adequate infrastructure such as roads, skid tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimising negative impacts on the environment.	Indicator 4.1.3 “Development, maintenance and use of infrastructure*, as well as transport activities, are managed to protect environmental values* and withstand the impacts of flooding”.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires minimisation of impacts during the development. Maintenance and use of the infrastructure.</p>	

PEFC ST 1003, 5.4.1	SAFAS 4
5.4.1 Forest management planning shall aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic levels and, where appropriate, diversity at landscape level.	<p>Indicator 5.3.1 “Best Available Information* is used to identify native ecosystems”.</p> <p>Indicator 5.3.2 “At least 10% of the certified area is comprised of representative sample areas* of native ecosystems* which are prioritized according to conservation value and protected”.</p> <p>Indicator 5.3.3 “The presence or likely presence of listed threatened or protected, species and their habitats occurring within and adjacent to the FMU is assessed using the best available information**”.</p> <p>Indicator 5.3.4 Priority species* are being managed and monitored according to best available information*.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS includes requirements for identification and protection of native ecosystems, threatened or protected, species and their habitats and creation of “conservation zones” (verifier to 5.3.2).</p> <p>PEFC ST 1003 recognises in Appendix 1 that the use of natural structures and processes, and genetic, species and structural diversity cannot be achieved in plantation forestry and that those functions are to be ensured by “set-aside” areas. This approach is satisfied by SAFAS 4 as it requires protection of certain habitats (wetlands, natural forests, etc.) and requires to set aside at least 10 % of the certified area (5.3.2).</p>	

PEFC ST 1003, 5.4.2	SAFAS 4
<p>5.4.2 Forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve ecologically important forest areas containing significant concentrations of:</p> <p>a) protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes;</p> <p>b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists;</p> <p>c) endangered or protected genetic <i>in situ</i> resources; and taking into account</p> <p>d) globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species.</p>	<p>Indicator 4.2.1 “Wetlands and riparian areas are identified, delineated and protected from forestry impacts by adequate buffers of appropriate vegetation guided by the best available information”.</p> <p>Indicator 4.2.2 “Wetlands*, riparian habitats* and their buffers are managed for maintenance or enhancement of ecosystem health and connectivity”.</p> <p>Indicator 4.2.3 “Safeguards to protect wetlands and riparian habitats* from the impacts of forestry activities are implemented”.</p> <p>Indicator 5.3.1 “Best Available Information* is used to identify native ecosystems”.</p> <p>Indicator 5.3.2 “At least 10% of the certified area is comprised of representative sample areas* of native ecosystems* which are prioritized according to conservation value and protected”.</p> <p>Indicator 5.3.3 “The presence or likely presence of listed threatened or protected, species and their habitats occurring within and adjacent to the FMU is assessed using the best available information*”.</p> <p>Indicator 5.3.4 Priority species* are being managed and monitored according to best available information*.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires identification and protection on native ecosystems (5.3.1, 5.3.2) and priority, threatened and protected species and their habitats (5.3.3, 5.3.4), wetlands and riparian areas (4.2.1, 4.2.2, 4.2.3). Verifiers and guidances for those indicators also include references to national classification systems and specific national conservation programmes.</p> <p>Protected, rare and representative ecosystems such as riparian areas and wetlands (PEFC requirement, bullet point a) are covered by protection / conservation of native ecosystems (5.3.1, 5.3.2) with of native vegetation types and protection of wetlands and riparian areas (4.2.1, 4.2.2, 4.2.3)</p> <p>Areas containing endemic species and habitats of threatened species (PEFC requirement, bullet point b) are covered by protection of threatened and protected species, priority species and their habitats (5.3.3, 5.3.4).</p> <p>Endangered or protected genetic <i>in situ</i> resources (PEFC requirement, bullet point c) are covered within the plantation forestry of South Africa by protection / conservation of native ecosystems</p>	

(5.3.1), protection of wetlands and riparian areas (4.2.1, 4.2.2, 4.2.3), protection of threatened and protected species, priority species and their habitats (5.3.3, 5.3.4).

Globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species (PEFC requirements, **bullet point d**) are covered by protection / conservation of native ecosystems (5.3.1), protection of wetlands and riparian areas (4.2.1, 4.2.2, 4.2.3), protection of threatened and protected species, priority species and their habitats (5.3.3, 5.3.4).

PEFC ST 1003, 5.4.3	SAFAS 4
<p>5.4.3 Protected and endangered plant and animal species shall not be exploited for commercial purposes. Where necessary, measures shall be taken for their protection and, where relevant, to increase their population.</p>	<p>Indicator 5.3.3 “The presence or likely presence of listed threatened or protected, species and their habitats occurring within and adjacent to the FMU is assessed using the best available information*”.</p> <p>Indicator 5.3.4 “Priority species* are being managed and monitored according to best available information”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS requires protection of threatened or protected species (5.3.3) and priority species (5.3.4). The priority species are defined as “they are usually nationally, or globally threatened, possibly endemic and require conservation effort” (see SAFAS 4, definitions).</p> <p>It should be noted that plantation forestry in South Africa focuses on management of introduced species that are neither protected nor threatened. The protection and conservation of protected and threatened species as well as priority species excludes their commercial utilisation.</p>	

PEFC ST 1003, 5.4.4	SAFAS 4
<p>5.4.4 Forest management shall ensure successful regeneration through natural regeneration or, where not appropriate, planting that is adequate to ensure the quantity and quality of the forest resources.</p>	<p>Indicator 7.2.1 “Harvested timber areas are re-established within a year of felling unless the area is being rehabilitated to natural vegetation for ecological reasons”.</p> <p>Indicator 7.2.2 “There is a clear justification for the choice of species and genotypes chosen for the plantation, which takes into account the objectives of the plantation, and the climate, geology and soils at the planting sites”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires successful regeneration (7.2.1) with suitable species (7.2.2).</p>	

PEFC ST 1003, 5.4.5	SAFAS 4
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<p>5.4.5 For reforestation and afforestation, origins of native species and local provenances that are well-adapted to site conditions shall be preferred, where appropriate. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been evaluated, and if negative impacts can be avoided or minimised.</p>	<p>Indicator 7.2.2 “There is a clear justification for the choice of species and genotypes chosen for the plantation, which takes into account the objectives of the plantation, and the climate, geology and soils at the planting sites”.</p> <p>Indicator 5.2.1 The organization has determined if the species they intend to grow or are growing are known to be invasive, and if so have appraised the landscape for signs that these may be a source of invasion.</p> <p>Indicator 5.2.2 “Where 5.2.1 is relevant then the organization is taking steps towards reducing the invasiveness of their plantations”.</p> <p>Indicator 5.2.3 “Where the FMU is a source of invasion then the organization is part of a cooperative and strategic approach with other land users and organizations to eradicate invasive plantation species from the landscape beyond the FMU”.</p>
<p>Conclusion: Conformity</p> <p>Justification: The South African plantation forestry is based on the use of exotic tree species. The chosen species shall be suitable for the climate, geology and soils at the planting sites (7.2.2) and the standard has comprehensive requirements to control invasiveness (5.2.1-5.2.3).</p>	

PEFC ST 1003, 5.4.6	SAFAS 4
<p>5.4.6 Afforestation and reforestation activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.</p>	<p>Indicator 4.2.2 “Wetlands*, riparian habitats* and their buffers are managed for maintenance or enhancement of ecosystem health and connectivity”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires management of wetlands and riparian habitats for the purposes of forest health and connectivity.</p> <p>Although SAFAS 4 does not explicitly refer to reforestation and afforestation relating to the restoration of ecological connectivity. However, the management of wetland areas and their buffer zones satisfies the purpose of the PEFC requirement, i.e. ecological connectivity.</p>	

PEFC ST 1003, 5.4.7	SAFAS 4
<p>5.4.7 Genetically-modified trees shall not be used.</p>	<p>Indicator 5.2.4 “Genetically modified organisms* are not used commercially”.</p>

Conclusion: Conformity

Justification: SAFAS 4 satisfies the requirement as it explicitly prohibits the use of genetically modified tree species. The definition of genetically modified trees in chapter Definition of SAFAS 4 is identical with the PEFC definition in PEFC ST 1003.

PEFC ST 1003, 5.4.8	SAFAS 4
5.4.8 Forest management practices shall, where appropriate, promote a diversity of both horizontal and vertical structures such as uneven-aged stands and the diversity of species such as mixed stands. Where appropriate, the practices shall also aim to maintain and restore landscape diversity.	Indicator 5.3.2 “At least 10% of the certified area is comprised of representative sample areas* of native ecosystems* which are prioritized according to conservation value and protected”.
Conclusion: Conformity Justification: SAFAS 4 has been established for the purposes of management of forest plantations where the PEFC requirement for horizontal and vertical diversity and diversity of species is not applicable. PEFC ST 1003 recognises in Appendix 1 that the use of natural structures and processes, and genetic, species and structural diversity cannot be achieved in plantation forestry and that those functions are to be ensured by “set-aside” areas. This approach is satisfied by SAFAS 4 as it requires protection of certain habitats (wetlands, natural forests, etc.) and requires to set aside at least 10 % of the certified area (5.3.2).	

PEFC ST 1003, 5.4.9	SAFAS 4
5.4.9 Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible.	
Conclusion: Not applicable Justification: SAFAS 4 has been established for the purposes of management of forest plantations where the PEFC requirement for traditional management system is not applicable.	

PEFC ST 1003, 5.4.10	SAFAS 4
5.4.10 Tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems. Wherever possible, practical measures shall be taken to improve or maintain biological diversity.	Indicator 5.2.6 “Damage to conservation zones should be avoided during harvesting. When damage occurs it must be repaired”. Indicator 4.1.1 “Soil erosion is minimised through the use of harvesting and silviculture systems which are appropriate to the slope, soil sensitivity and weather”. Indicator 4.2.3

	“Safeguards to protect wetlands and riparian habitats* from the impacts of forestry activities are implemented”.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires minimisation of damages to conservation zones (5.2.6), soil (4.1.1) and water resources (4.2.3).</p>	

PEFC ST 1003, 5.4.11	SAFAS 4
5.4.11 Infrastructure shall be planned and constructed in a way that minimises damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.	<p>Indicator 4.1.3</p> <p>“Development, maintenance and use of infrastructure*, as well as transport activities, are managed to protect environmental values* and withstand the impacts of flooding”.</p> <p>Indicator 4.2.3</p> <p>“Safeguards to protect wetlands and riparian habitats* from the impacts of forestry activities are implemented”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires minimisation of impacts of infrastructure (4.1.3) and forestry activities (4.2.3) on environment and water resources (wetland, riparian areas).</p>	

PEFC ST 1003, 5.4.12	SAFAS 4
5.4.12 With due regard to management objectives, measures shall be taken to balance the pressure of animal populations and grazing on forest regeneration and growth as well as on biodiversity.	<p>Indicator 5.3.7</p> <p>“Grazing by livestock and wildlife populations shall be managed to prevent degradation of the natural habitat”.</p> <p>Indicator 6.4.3</p> <p>“Where damage-causing animals (e.g. baboons, bush pigs, antelope & rodents) pose a significant threat to the productivity of the plantation, they are controlled according to recommended protocols and in line with legislation”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires protection of forests from both grazing as well as wildlife populations.</p>	

PEFC ST 1003, 5.4.13	SAFAS 4
5.4.13 Standing and fallen dead wood, hollow trees, old groves and special rare tree species shall be left in quantities and distribution necessary to safeguard biological diversity, taking into account the potential effect on the	<p>Indicator 5.3.2</p> <p>“At least 10% of the certified area is comprised of representative sample areas* of native</p>

health and stability of forests and on surrounding ecosystems.	ecosystems* which are prioritized according to conservation value and protected".
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 has been established for the purposes of management of forest plantations where the PEFC requirement for dead wood is not applicable.</p> <p>PEFC ST 1003 recognises in Appendix 1 that the use of natural structures and processes, and genetic, species and structural diversity cannot be achieved in plantation forestry and that those functions are to be ensured by "set-aside" areas. This approach is satisfied by SAFAS 4 as it requires protection of certain habitats (wetlands, natural forests, etc.) and requires to set aside at least 10 % of the certified area (5.3.2).</p>	

PEFC ST 1003, 5.5.1	SAFAS 4
5.5.1 Forest management planning shall aim to maintain and enhance protective functions of forests for society, such as protection of infrastructure, protection from soil erosion, protection of water resources and from adverse impacts of water such as floods or avalanches.	<p>Indicator 4.1.1</p> <p>"Soil erosion is minimised through the use of harvesting and silviculture systems which are appropriate to the slope, soil sensitivity and weather".</p> <p>Indicator 4.2.1</p> <p>"Wetlands and riparian areas are identified, delineated and protected from forestry impacts by adequate buffers of appropriate vegetation guided by the best available information".</p> <p>Indicator 5.1.1</p> <p>"Operations are planned and managed to prevent adverse off-site environmental impacts, including impacts to neighbouring communities and other stakeholders".</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirements for protection of soil and water resources.</p> <p>SAFAS 4 includes requirements for minimising of soil erosion. However, forest plantations in South Africa are not established on sites that have special protective functions to society, e.g. protecting infrastructure from soil erosion, etc.</p>	

PEFC ST 1003, 5.5.2	SAFAS 4
5.5.2 Areas that fulfil specific and recognised protective functions for society shall be registered and mapped, and forest management plans or their equivalents shall take these areas into account.	
<p>Conclusion: Not applicable</p> <p>Justification: SAFAS 4 includes requirements for minimising of soil erosion. However, forest plantations in South Africa are not established on sites that have special protective functions to society, e.g. protecting infrastructure from soil erosion, etc.</p>	

PEFC ST 1003, 5.5.3	SAFAS 4
<p>5.5.3 Special care shall be given to silvicultural operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Inappropriate techniques such as deep soil tillage and use of unsuitable machinery shall be avoided in such areas. Special measures shall be taken to minimise the pressure of animal populations.</p>	<p>Indicator 4.1.1 “Soil erosion is minimised through the use of harvesting and silviculture systems which are appropriate to the slope, soil sensitivity and weather”.</p> <p>Indicator 4.1.2 “Soil is protected through responsible residue management”.</p> <p>Indicator 4.1.4 “Eroded areas are rehabilitated and interventions monitored and adapted to ensure effectiveness and steps are taken to prevent soil erosion”.</p> <p>Indicator 5.3.7 “Grazing by livestock and wildlife populations shall be managed to prevent degradation of the natural habitat”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirements for soil protection (4.1.1, 4.1.2), rehabilitation of eroded areas (4.1.4) and minimisation of grazing impacts on natural habitats and soil erosion (5.3.7).</p>	

PEFC ST 1003, 5.5.4	SAFAS 4
<p>5.5.4 Special care shall be given to forest management practices in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided.</p>	<p>Indicator 4.2.1 “Wetlands and riparian areas are identified, delineated and protected from forestry impacts by adequate buffers of appropriate vegetation guided by the best available information.”</p> <p>Indicator 4.2.2 “Wetlands*, riparian habitats* and their buffers are managed for maintenance or enhancement of ecosystem health and connectivity”.</p> <p>Indicator 4.2.3 “Safeguards to protect wetlands and riparian habitats* from the impacts of forestry activities are implemented”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirements for protection of water resources (wetlands and riparian areas).</p>	

PEFC ST 1003, 5.5.5	SAFAS 4
<p>5.5.5 Construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. Proper road drainage facilities shall be installed and maintained.</p>	<p>Indicator 4.1.3 “Development, maintenance and use of infrastructure”, as well as transport activities, are managed to protect environmental values* and withstand the impacts of flooding”.</p> <p>Guidance to 4.1.3 specifies that the requirement should cover: (i) minimising the road density, (ii) low impact construction, (iii) construction of stream crossings, (iv) set back distances to water bodies and courses, wetlands (also 4.2.1 applies).</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires minimisation of infrastructure’s negative impacts on environment, including water resources.</p>	

PEFC ST 1003, 5.6.1	SAFAS 4
<p>5.6.1 Forest management planning shall aim to respect the multiple functions of forests to society, give due regard to the role of forestry in rural development, and especially consider new opportunities for employment in connection with the socio-economic functions of forests.</p>	<p>Criterion 2.3 “The organization contributes to socio-economic development in the area where they operate”.</p> <p>Indicator 2.3.1 “The organization contributes to employment and job creation”.</p> <p>Indicator 2.3.2 “The organization's employment policies are responsive to the local* socio-economic context”.</p> <p>Indicator 2.3.3 “Demonstrable efforts to employ local workers and source local service providers”.</p> <p>Indicator 2.3.4 “Opportunities for local social and economic development are identified through engagement* with local communities* and other relevant organizations”.</p> <p>Indicator 7.1.2 “The range of resources and ecosystem services* on the FMU and the potential benefits to local communities are known by management”.</p> <p>Indicator 7.1.3 “The organization diversifies the range of products and services produced on the FMU</p>

	where this is beneficial to the sustainability of the operation and the community”.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirements for socio-economic functions, including rural development, employment, environmental services, etc.</p>	

PEFC ST 1003, 5.6.2	SAFAS 4
5.6.2 Forest management shall promote the long-term health and well-being of communities within or adjacent to the forest management area.	<p>Criterion 2.3</p> <p>“The organization contributes to socio-economic development in the area where they operate”.</p> <p>Indicator 2.3.1</p> <p>“The organization contributes to employment and job creation”.</p> <p>Indicator 2.3.2</p> <p>“The organization's employment policies are responsive to the local* socio-economic context”.</p> <p>Indicator 2.3.3</p> <p>“Demonstrable efforts to employ local workers and source local service providers”.</p> <p>Indicator 2.3.4</p> <p>“Opportunities for local social and economic development are identified through engagement* with local communities* and other relevant organizations”.</p> <p>Indicator 7.1.2</p> <p>“The range of resources and ecosystem services* on the FMU and the potential benefits to local communities are known by management”.</p> <p>Indicator 7.1.3</p> <p>“The organization diversifies the range of products and services produced on the FMU where this is beneficial to the sustainability of the operation and the community”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirements for socio-economic functions, including rural development and local employment.</p>	

PEFC ST 1003, 5.6.3	SAFAS 4
<p>5.6.3 Property rights and land tenure arrangements shall be clearly defined, documented and established for the relevant forest area. Likewise, legal, customary and traditional rights related to the forest land shall be clarified, recognised and respected.</p>	<p>Indicator 2.1.1 “Legal tenure to manage and use resources within the scope of the certificate is demonstrated”.</p> <p>Indicator 2.1.2 “Access and use by legitimate rights holders are understood and respected”</p> <p>Verifiers to 2.1.2 include (i) legal tenure rights, servitudes and other legal access rights, (iii) legal and customary rights and (iv) land claims lodged to the FMU.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires identification and respect towards property, land tenure, customary and traditional rights.</p>	

PEFC ST 1003, 5.6.4	SAFAS 4
<p>5.6.4 Forest management activities shall be conducted in recognition of the established framework of legal, customary and traditional rights such as outlined in ILO 169 and the UN Declaration of the Rights of Indigenous Peoples, which shall not be infringed upon without the free, prior and informed consent of the holders of the rights, including the provision of compensation where applicable. Where the extent of rights is not yet resolved or is in dispute there are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.</p>	<p>Chapter 9 includes introduction to indigenous peoples in South Africa and concludes that:</p> <ul style="list-style-type: none"> - majority of indigenous peoples in South Africa (known as Khoe-San, ca 100.000 people) live in areas that are not suitable for forest plantations; - the only surviving indigenous people within forest plantations regions are very small in numbers (30-100 people) and are difficult to identify within the local communities and their interest cannot be separated from the interest of local communities. <p>For these reasons, the standard does not include specific requirements for indigenous people but covers their interest under the requirements for disadvantaged people in local communities.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 treats indigenous people as disadvantaged people in local communities and does not define specific requirements for indigenous people.</p> <p>This approach is considered as justifiable taking into account the specifics of indigenous people in South Africa. The applicant’s approach is also consistent with the report of an independent indigenous people’s experts^[26] that was primarily prepared for the South African FSC process and that was reviewed by the assessor.</p>	

PEFC ST 1003, 5.6.5	SAFAS 4
<p>5.6.5 Adequate public access to forests for the purpose of recreation shall be provided taking into account respect for ownership rights and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.</p>	<p>Indicator 7.1.2 “The range of resources and ecosystem services* on the FMU and the potential benefits to local communities are known by management”.</p> <p>Indicator 2.4.1 “Sites of cultural, ecological, recreational, historical, aesthetic and spiritual significance are identified and protected Access is granted to interested and affected parties”.</p> <p>Indicator 2.1.2 “Access and use by legitimate rights holders are understood and respected”.</p> <p>Indicator 2.2.3 “There is a mutual understanding of the resource requirements and other needs within the community and these are met where possible”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirements that recognise the range of resources and ecosystem services and benefits to local communities (7.1.2), access and use by legitimate rights holders (2.1.2), community needs (2.2.3) and access to cultural, ecological and recreational sites for interested and affected parties (2.4.1).</p> <p>Although the standard does not provide full public access to forest resources, taking into account the intensive plantation management, safety as well as fire risks, the approach of providing access to selective sites (2.4.1) and co-operation with local communities in use and access to adjacent forest (2.1.2, 2.2.3) satisfies the objective of the “adequate” access.</p>	

PEFC ST 1003, 5.6.6	SAFAS 4
<p>5.6.6 Sites with recognised specific historical, cultural or spiritual significance and areas fundamental to meeting the basic needs of local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site.</p>	<p>Indicator 2.4.1 “Sites of cultural, ecological, recreational, historical, aesthetic and spiritual significance are identified and protected Access is granted to interested and affected parties”.</p> <p>Indicator 2.2.3 “There is a mutual understanding of the resource requirements and other needs within the community and these are met where possible”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires access to sites of cultural, ecological, recreational historical and spiritual significance (2.4.1). The standard also requires active approach of communication and cooperation with local communities in using forest resources (2.2.3, and its Guidance). This approach satisfies the objective of managing sites important for needs of local communities.</p>	

PEFC ST 1003, 5.6.7	SAFAS 4
<p>5.6.7 Forest management operations shall take into account all socio-economic functions, especially the recreational function and aesthetic values of forests by maintaining for example varied forest structures, and by encouraging attractive trees, groves and other features such as colours, flowers and fruits. However, this shall be done in a way and to an extent that does not lead to serious negative effects on forest resources, and forest land.</p>	<p>Indicator 5.3.2 “At least 10% of the certified area is comprised of representative sample areas* of native ecosystems* which are prioritized according to conservation value and protected”.</p> <p>Indicator 4.2.2 “Wetlands*, riparian habitats* and their buffers are managed for maintenance or enhancement of ecosystem health and connectivity”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires to protect native ecosystems (representative sample areas, 5.3.2), wetlands and riparian areas and it is expected that those areas are set-aside from intensive plantation management.</p> <p>PEFC ST 1003 recognises in Appendix 1 that the use of natural structures and processes, and genetic, species and structural diversity cannot be achieved in plantation forestry and that those functions are to be ensured by “set-aside” areas. This approach is satisfied by SAFAS 4 as it requires protection of certain habitats (wetlands, natural forests, etc.) and requires to set aside at least 10 % of the certified area (5.3.2).</p>	

PEFC ST 1003, 5.6.8	SAFAS 4
<p>5.6.8 Forest managers, contractors, employees and forest owners shall be provided with sufficient information and encouraged to keep up-to-date through continuous training in relation to sustainable forest management as a precondition for all management planning and practices described in this standard.</p>	<p>Indicator 3.4.1 “All workers have had relevant job specific training and where required or appropriate hold the necessary skills certificates”.</p> <p>The definition of “workers” covers all employees, internal as well as contractual.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires training for workers and requires appropriate skills certificates.</p>	

PEFC ST 1003, 5.6.9	SAFAS 4
<p>5.6.9 Forest management practices shall make the best use of local forest-related experience and knowledge, such as those of local communities, forest owners, NGOs and local people.</p>	<p>Indicator 5.3.1 “Best Available Information* is used to identify native ecosystems*”.</p> <p>Indicator 5.3.2 “The presence or likely presence of listed threatened or protected, species and their habitats occurring within and adjacent to the FMU is assessed using the best available information*”.</p> <p>Indicator 5.3.3 “The presence or likely presence of listed threatened or protected, species and their habitats occurring within and adjacent to the FMU is assessed using the best available information*”.</p> <p>Definitions: “best available information: Data, facts, documents, expert opinions, and results of field surveys or consultations with stakeholders that are most credible, accurate, complete, and/or pertinent and that can be obtained through reasonable* effort and cost, subject to the scale* and intensity* of the management activities and the Precautionary Approach*”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires identification of native ecosystems and priority species following the “Best Available Information” approach. The definition of the approach includes usage of local knowledge and consultation with stakeholders and satisfies the objective of the requirement.</p>	

PEFC ST 1003, 5.6.10	SAFAS 4
<p>5.6.10 Forest management shall provide for effective communication and consultation with local people and other stakeholders relating to sustainable forest management and shall provide appropriate mechanisms for resolving complaints and disputes relating to forest management between forest operators and local people.</p>	<p>Indicator 2.1.1 “Legal tenure to manage and use resources within the scope of the certificate is demonstrated”.</p> <p>Indicator 2.2.1 “There is evidence of ongoing stakeholder engagement”.</p> <p>Indicator 2.2.2 “Grievances/disputes are resolved using locally accepted mechanisms and/or institutions”.</p> <p>Indicator 2.2.3 “There is a mutual understanding of the resource requirements and other needs within</p>

	<p>the community and these are met where possible”.</p> <p>Indicator 2.2.4</p> <p>“Indicators of community disharmony are noted, analysed and solutions are sought”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 include comprehensive requirements (2.2) for engagement with local communities, including resolution of grievances (2.2.2) and understanding of local communities needs (including consultation and communication outlined in verifiers) and consideration of any community disharmony (2.2.3).</p>	

PEFC ST 1003, 5.6.11	SAFAS 4
<p>5.6.11 Forestry work shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.</p>	<p>Indicator 3.2.1</p> <p>“Hazards to the health and safety of workers from forestry activities have been identified”.</p> <p>Indicator 3.2.2</p> <p>“There are procedures for working safely”.</p> <p>Indicator 3.2.3</p> <p>“Workers are aware of hazards in the workplace and are trained on safe work procedures in compliance with the national legislation”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 has comprehensive requirement for occupational health and safety (3.2) including identification of risks (3.2.1), measures described in procedures (3.2.2) and information /training to be provided to workers (3.2.3).</p>	

PEFC ST 1003, 5.6.12	SAFAS 4
<p>5.6.12 Working conditions shall be safe, and guidance and training in safe working practices shall be provided to all those assigned to a task in forest operations.</p>	<p>Indicator 3.2.4</p> <p>“Safe work procedures are carried out in the work place”.</p> <p>Indicator 3.2.5</p> <p>“Workers have personal protective equipment appropriate to their assigned tasks”.</p> <p>Indicator 3.2.6</p> <p>“Past incidents are recorded, trends examined and safety practices adjusted to avoid recurrence”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 has comprehensive requirement for occupational health and safety (3.2) including safe work procedures (3.2.4), personal protective equipment (3.2.5) and records keeping (3.2.6).</p>	

PEFC ST 1003, 5.6.13	SAFAS 4
<p>5.6.13 Forest management shall comply with fundamental ILO conventions.</p>	<p>Indicator 3.1.1 “Forest owners and managers take responsibility for ensuring compliance with labour legislation”.</p> <p>Indicator 3.1.2 “Compliance with the legislation that promotes equal opportunity in the workplace”.</p> <p>Indicator 3.1.3 “Workers are able to negotiate their conditions of employment through: - collective bargaining with formal and informal workers organizations* or in the absence of Union structures, workers are adequately informed of and consulted on matters that directly affect their working conditions”.</p> <p>Indicator 3.1.4 “Wages comply with national legislation”.</p> <p>Indicator 3.1.5 “A dispute* resolution process that is acceptable to all parties, is in place”.</p> <p>Indicator 3.1.6 “Fair compensation* is provided to Workers* for work-related loss or damage of property and occupational disease* or injuries”.</p>
<p>Conclusion: conformity</p> <p>Justification: SAFAS 4 includes explicit requirements for compliance with applicable labour legislation.</p> <p>SAFAS 4 satisfies the requirement as South Africa ratified all Fundamental ILO Conventions and there is sufficient level of confidence that those conventions were incorporated into the national legislation.</p> <p>(http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:102888)</p>	

PEFC ST 1003, 5.6.14	SAFAS 4
5.6.14 Forest management shall be based inter-alia on the results of scientific research. Forest management shall contribute to research activities and data collection needed for sustainable forest management or support relevant research activities carried out by other organisations, as appropriate.	Indicator 1.2.4 “Forest management shall be based inter-alia on the results of scientific research. Forest management shall contribute to research activities and data collection needed for sustainable forest management or support relevant research activities carried out by other organisations, as appropriate”.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires management to be based on the results of research.</p>	

PEFC ST 1003, 5.7.1	SAFAS 4
5.7.1 Forest management shall comply with legislation applicable to forest management issues including forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous people; health, labour and safety issues; and the payment of royalties and taxes.	Indicator 1.1.1 “Plantations are established in accordance with; 1) Applicable laws* and regulations and administrative requirements, 2) Legal* and customary rights” Indicator 1.1.3 “There shall be no substantiated outstanding claims of legal non-compliance related to plantation management raised by regulatory authorities.” Appendix 1 defines applicable laws within the areas of land tenure, water use, taxes and fees, priority species, protected sites and species, environment protection, health and safety, employment, customary rights, anticorruption and others.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 requires compliance with legislation. The areas of laws and specific Acts listed in Appendix 1 satisfy the scope of legal compliance of the PEFC requirement.</p>	

PEFC ST 1003, 5.7.2	SAFAS 4
5.7.2 Forest management shall provide for adequate protection of the forest from unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.	Indicator 6.1.1 “Measures are implemented to provide protection* from timber theft, illegal hunting, fishing, trapping, collecting, settlement and other unauthorized activities”.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 4 includes requirement for protection of forests against illegal activities of third parties.</p>	

Annex D: Detailed assessment of requirements for forest management certification bodies

Annex 6 of the PEFC TD	SAFAS 6, chapter 3
Does the scheme documentation require that certification shall be carried out by impartial, independent third parties that cannot be involved in the standard setting process as governing or decision making body, or in the forest management and are independent of the certified entity?	"PEFC certifications shall be carried out by impartial, independent third parties that cannot be involved in the standard setting process as governing or decision making bodies, or in the forest management and are independent of the certified entity."
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 6 is identical to the PEFC requirement.</p>	

Annex 6 of the PEFC TD	SAFAS 6
Does the scheme documentation require that certification body for forest management certification shall fulfil requirements defined in ISO 17021 or ISO Guide 65?	<p>Chapter 3</p> <p>"The certification body carrying out forest management certification against SAFAS 4;2018 - Forest Management Standard, shall fulfil requirements defined in i) ISO 17021:2015..."</p> <p>Chapter 5.2:</p> <p>"The applied certification procedures for forest management certification shall be compatible with the requirements defined in any of ISO 17021:2015"</p> <p>Chapter 2.1: normative references: "ISO/IEC 17021-1:2015 Conformity assessment – Requirements for bodies providing audit and management systems".</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 6 requires the certification body's compliance with ISO 17021.</p> <p>Although the requirements make reference to ISO 17021:2015, the chapter normative references includes full and correct identification of the standard (ISO/IEC 17021-1:2015).</p>	

Annex 6 of the PEFC TD	SAFAS 6, chapter 3c
Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?	“The certification body carrying out forest certification shall have the technical competence in forest management and on its economic, social and environmental impacts and benefits to society”.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 6 is identical to the PEFC requirement.</p>	

Annex 6 of the PEFC TD	SAFAS 6, 3d
Does the scheme documentation require that certification bodies shall have a good understanding of the national PEFC system against which they carry out forest management or C-o-C certifications?	“The certification body shall have a thorough understanding of the SAFAS system including all standards and documents (refer to chapter 2.4 for list”.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 6 requires understanding of the SAFAS scheme.</p>	

Annex 6 of the PEFC TD, 3.2	SAFAS 6, 4.1
Does the scheme documentation require that certification bodies have the responsibility to use competent auditors and who have adequate technical know-how on the certification process and issues related to forest management certification?	“Certification bodies have the responsibility to use competent auditors that have adequate technical know-how on the certification process and issues related to forest management”.
<p>Conclusion: Conformity</p> <p>Justification: The technical know-how on the certification process is ensured by the reference to ISO 19011. The forest management competence is provided by bullet point 4 referring to the forest management sector, forest related legislation and environmental, social and economic impacts.</p> <p>Observation: SAFAS 6 is identical to the PEFC requirement.</p>	

Annex 6 of the PEFC TD, 3.2	SAFAS 6
Does the scheme documentation require that the auditors must fulfil the general criteria of ISO 19011 for Quality Management Systems auditors or for Environmental Management Systems auditors?	<p>Chapter 4.2</p> <p>“The auditors shall fulfil general criteria for quality and environmental management systems auditors as defined in ISO 19 011”.</p> <p>Chapter Normative references: “ISO 19011:2011 Guidelines for quality and/or environmental management systems auditing”.</p>

Conclusion: Conformity

Justification: SAFAS 6 requires the auditors to comply with ISO 19011.

Annex 6 of the PEFC TD, 3.2	SAFAS 6, 4.3
Does the scheme documentation include additional qualification requirements for auditors carrying out forest management audits?	<p>SAFAS 6 is very general and does not define scheme specific qualification requirements for auditors except chapter 4.3:</p> <p>“The preferred requirement is a Bachelor of Technology in Forestry or a National Diploma in Forestry and at least 3 years’ experience in Forest Management. Equivalent qualifications in agricultural or life sciences fields can be acceptable if forestry experience can be demonstrated”.</p>
<p>Conclusion: Not mandatory requirement</p>	

Annex 6 of the PEFC TD, 3.2	SAFAS 6, 5.1
Does the scheme documentation require that certification bodies shall have established internal procedures for forest management certification?	<p>“The certification body shall have established internal procedures for forest management certification against SAFAS 4: 2017 – Forest Management Standard”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 6 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	SAFAS 6
Does the scheme documentation require that applied certification procedures for forest management certification shall fulfil or be compatible with the requirements defined in ISO 17021 or ISO Guide 65?	<p>Chapter 5.2:</p> <p>“The applied certification procedures for forest management certification shall be compatible with the requirements defined in any of ISO 17021:2015”</p> <p>Chapter 2.1: normative references: “ISO/IEC 17021-1:2015 Conformity assessment – Requirements for bodies providing audit and management systems”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 6 requires the certification body’s compliance with ISO 17021.</p> <p>Although the requirements make reference to ISO 17021:2015, the chapter normative references includes full and correct identification of the standard (ISO/IEC 17021-1:2015).</p>	

Annex 6 of the PEFC TD, 4	SAFAS 6
Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Chapter 5.3: “The applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011:2011”. Chapter Normative references: “ISO 19011:2011 Guidelines for quality and/or environmental management systems auditing”.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 6 requires the auditors to comply with ISO 19011.</p>	

Annex 6 of the PEFC TD, 4	SAFAS 6, 5.4
Does the scheme documentation require that certification body shall inform the relevant PEFC National Governing Body about all issued forest management and chain of custody certificates and changes concerning the validity and scope of these certificates?	“The certification body shall inform the SAFAS National Governing Body about all issued forest management certificates and changes concerning validity and scope of these certificates”.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 6 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	SAFAS 6, 5.5
Does the scheme documentation require that certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?	“The certification body shall control of PEFC logo usage if the certified entity is a PEFC logo user”.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 6 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	SAFAS 6, 5.6
Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	“The maximum period for surveillance audits shall be one year and maximum period for reassessment audit is five years”.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 6 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	SAFAS 6, 5.6
Does a maximum period for assessment audit not exceed five years for forest management certifications?	"The maximum period for surveillance audits shall be one year and maximum period for reassessment audit is five years".
Conclusion: Conformity Justification: SAFAS 6 satisfies the requirement.	

Annex 6 of the PEFC TD, 4	SAFAS 6, 5.8
Does the scheme documentation include requirements for public availability of certification report summaries?	"A summary of the certification report, including a summary of findings on the auditee's conformity with the forest management standard, written by the certification body, shall be made available to the public by SAFAS NGB within 30 days of completion of the audit".
Conclusion: Conformity Justification: SAFAS 6 includes the requirement for public availability of the certification report summary and specifies its availability within 30 days after the completion of the audit.	

Annex 6 of the PEFC TD, 4	SAFAS 6, 5.7
Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	"The audit evidence to determine the conformity with SAFAS 4:2018: Forest Management Standard shall amongst other relevant information, include sufficient consultation with external stakeholders to ensure that all relevant issues are identified relating to compliance with the requirements of the standard.
Conclusion: Conformity Justification: SAFAS 6 includes the requirement for usage of information from external parties and stakeholders consultation.	

Annex 6 of the PEFC TD, 4	SAFAS 6
Does the scheme documentation include additional requirements for certification procedures?	SAFAS 6 is very general and does not define scheme specific qualification requirements for certification procedures.
Conclusion: Not mandatory requirement	

Annex 6 of the PEFC TD, 5	SAFAS 6
Does the scheme documentation require that certification bodies carrying out forest management certification shall be accredited by a national accreditation body?	<p>Chapter 6.1:</p> <p>“Certification bodies carrying out forest management certification, shall be accredited by a national accreditation body so as to ensure the credibility of the certification work and to facilitate mutual recognition”.</p> <p>Chapter 6.6</p> <p>“In exceptional circumstances, the PEFC Council General Assembly can approve a time limited exemption from the above requirements based on a written application from the SAFAS Governing Body. The application shall state (i) reasons for requesting the exemption, (ii) description of how the credibility of the certification process will be assured including a list of measures currently undertaken to ensure the credibility”.</p>
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 6 requires the certification body to be accredited by a national accreditation body.</p> <p>Observation: Chapter 6.6 provides possibility for additional exemptions to be made by the PEFC Council General Assembly. Although the PEFC Council General Assembly is the highest decision making body within the PEFC scheme, the current PEFC documentation does not include procedures for making such exemptions and the SAFAS Council is not in a position to define which exemptions can and cannot be made by the PEFC Council General Assembly.</p>	

Annex 6 of the PEFC TD, 5	SAFAS 6, 6.1
Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	“An accredited certificate shall bear an accreditation symbol of the relevant accreditation body”.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 6 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 5	SAFAS 6
Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a part of the International Accreditation Forum (IAF) umbrella or a member of IAF’s special recognition regional groups and which implement procedures described in ISO 17011 and other documents recognised by the above mentioned organisations?	<p>Chapter 6.2</p> <p>“Accreditation bodies shall be a member of the International Accreditation Forum (IAF) or a member of IAF’s special recognition regional groups and implement procedures described in ISO/IEC 17011:2004 and other documents recognised by the above organisations”.</p> <p>Chapter 6.6</p>

	<p>“In exceptional circumstances, the PEFC Council General Assembly can approve a time limited exemption from the above requirements based on a written application from the SAFAS Governing Body. The application shall state (i) reasons for requesting the exemption, (ii) description of how the credibility of the certification process will be assured including a list of measures currently undertaken to ensure the credibility”.</p>
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Conclusion: Conformity

Justification: SAFAS 6 requires membership in IAF.

Chapter 6.6 provides possibility for additional exemptions to be made by the PEFC Council General Assembly. Although the PEFC Council General Assembly is the highest decision making body within the PEFC scheme, the current PEFC documentation does not include procedures for making such exemptions and the SAFAS Council is not in a position to define which exemptions can and cannot be made by the PEFC Council General Assembly.

Annex 6 of the PEFC TD, 5	SAFAS 6
Does the scheme documentation require that certification body undertake forest management as “accredited certification” based on ISO 17021 or ISO Guide 65 and the relevant forest management or chain of custody standard(s) shall be covered by the accreditation scope?	<p>Chapter 6.4: “The certification body carrying out forest management certification shall be accredited based on 17021:2015”.</p> <p>Chapter 2.1: normative references: “ISO/IEC 17021-1:2015 Conformity assessment – Requirements for bodies providing audit and management systems”.</p>

Conclusion: Conformity

Justification: SAFAS 6 requires the certification body’s accreditation based on ISO 17021:2015.

Although the requirements make reference to ISO 17021:2015, the chapter normative references includes full and correct identification of the standard (ISO/IEC 17021-1:2015).

Annex 6 of the PEFC TD, 5	SAFAS 6, SAFAS 7
Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	<p>SAFAS 6, chapter 7 states that: “Certification bodies operating forest management certification against SAFAS 4:2017 Forest Management Standard shall be notified by the SAFAS National Governing Body”.</p> <p>Detailed procedures for notification of certification bodies is include in SAFAS 7.</p>

Conclusion: Conformity

Justification: SAFAS 6 and SAFAS 7 satisfy the requirement⁹.

⁹ The assessment is only focused on the whether or not the scheme requires the certification body to be notified. The content of notification procedures and their compliance with PEFC GD 1004 is not covered by the scope of this assessment.

Annex 6 of the PEFC TD, 5	SAFAS 6, SAFAS 7
Are the procedures for the notification of certification bodies non-discriminatory?	SAFAS 6, chapter 7 states that: „The PEFC notification conditions shall not discriminate against certification bodies or create trade obstacles”.
<p>Conclusion: Conformity</p> <p>Justification: SAFAS 6 prohibits discrimination within the notification. SAFAS 7 does not include any requirement that could be used to discriminate a certification body.</p>	

Annex E: Stakeholders representation in the WG

	Person - representative in the process	Organization/Institution/stakeholder group
1	David Everard	Sappi Forests) - Industry Large Scale forestry
2	Craig Norris	NCT Forestry Cooperative - Industry Smallholders and farmers
3	Makwena Meleka (Department of Agriculture, Forestry and Fisheries, Government
4	Oscar Mokotedi	Department Environmental Affairs - Government Environment
5	Vusi Dladla	(NCT) - Communities and Smallholders
6	Steven Germishuizen	African Environmental Services - Environment
7	Sanele Khuzwayo	(LIMA) - Rural development and communities

Annex F: Comments from the PEFC Council's international consultation

The PEFC Council has announced at its website an international consultation on the endorsement of the SAFAS scheme.

The PEFC Council received comments from only one person/organisation. The assessor met the person during the face-to-face meeting and discussed the submitted comments as well as the standard setting process.

Comment	Assessor's response
<p>As Mondi, we submitted detailed comments on the SAFAS Standard during the South African stakeholder consultation period in late Sep 2017, but unfortunately missed the deadline by 2 days due to a misread of the deadline date. However, we believe that many of the comments we have made will add value to the Standard, its structure, flow, auditability, necessary rigour, etc.</p> <p>We have reviewed the updated SAFAS Standard submitted to PEFC, and believe that many of the comments we made on the draft SAFAS Standard in Sep are still valid. Please can you send me an email address to which I could email these comments (detailed indicator by indicator) in a separate document.</p>	<p>The applicant satisfied the 60 days consultation period as required by PEFC ST 1001.</p> <p>However, it should be noted that the timing of the standard setting process has been very short and that the Working Group considered the comments from public consultation immediately after its end on 2 October 2017.</p> <p>The PEFC Council does not have specific requirements relating to the overall minimum time dedicated to the standard setting and as such the issue is reported as an observation.</p>
<p>Overall, a much simpler standard in the way it has been written and conveyed. But at the same time, the structure and flow of the Standard is different to what we are used to in South Africa.</p> <p>It would have been much easier to comment on the Standard, if we had an introductory document explaining the approach to the Standard (e.g. the 7 key areas or "Principles", the relevant "Criteria", why some aspects are in certain Principles and not in others).</p> <p>Some elements are now scattered throughout the Standard, e.g. legal compliance requirements, operational management requirements, rather than being in one specific "Principle". E.g. Silviculture and harvesting lumped into one indicator. Then specific components separated out – and scattered through the Standard. It may make more sense to have all Operational specific controls under one Principle, and to then cross link / reference where required?</p>	<p>The PEFC assessment focuses on the content of the national forest management standard while the structure of the standard is left to the national standardisation body.</p>
<p>The Standard is incomplete or incoherent in places. I.e. several of the indicators lack guidance. Only have verifiers.</p> <p>Due to the copy and paste of some of the indicators, verifiers and guidance from FSC standard, there is a need to check cross-references, whether numbers or relevant</p>	<p>The PEFC assessment focuses on the content of the national forest management standard while the structure of the standard is left to the national standardisation body.</p> <p>The issue of *marks has been reported as an observation.</p>

<p>headings. In addition, there are numerous terms with * next to them – this seems to come from the FSC Standard, where such terms are clearly defined into requirements of the FSC Certification System.</p> <p>Some of the indicators are worded so broadly that they either resemble Criteria, or they have multiple issues included for consideration, which will make them very challenging! I.e. are they auditable?</p> <p>There is a concern that some of the verifiers should be guidance, and some of the guidance should be verifiers. It depends on how the V & G are being seen: are they both normative, or only the verifiers?</p>	
<p>Group Scheme mentioned in multiple places, but not defined in SIZE tab. TA and FF defined in SIZE tab, but not mentioned in the Standard.</p> <p>TA's are the governing entity in tribal areas – 99% of the time, they are not the legal entities responsible for the forestry management activities, and hence they cannot be held accountable into the requirements of the Standard. The individual growers or family forestry entities, or the Group Scheme need to be held accountable.</p> <p>Need to define Group Schemes in the SIZE tab</p> <p>Size differentiation: no hectare based differentiation. Any reason why not?</p>	<p>The issue of requirements being linked to different users has been analysed and reported.</p> <p>Concerning the Group scheme, the requirements apply to individual members of the group while the responsibility for their compliance lies with the group entity.</p>
<p>Group Schemes have a significant role to play in avoiding or minimising environmental and social impacts from forestry operations. However, due to the way the SAFAS standard is worded, there are numerous areas where FF / Individual growers / Group Schemes have been excluded from meeting certain requirements – see inputs in specific indicators in the Standard.</p>	<p>FF and TA are required to only comply with those requirements of the Standard that are identified as “all”. It has been reported that the requirements for “all” users alone do not satisfy the PEFC Council requirements.</p>
<p>Monitoring not explicit enough, and not coordinated enough.</p> <p>Need an indicator under management planning to promote more integrated and explicit monitoring, into scale, intensity and risk, pulling together various monitoring elements scattered throughout the Standard.</p> <p>Monitoring and measurement - even when verbal / informal by Owner/Manager or Family Farmer - is critical for effective management of values, of risks to these values, and for the economic sustainability of the business.</p> <p>Monitoring not required in certain indicators, where it should be an absolute requirement, e.g.</p>	<p>The lack of specific monitoring requirements have been reported as “minor” non-conformity.</p>

<p>monitoring of water quality, monitoring of natural ecosystems.</p>	
<p>Need more effective cross-referencing to actual indicators, instead of putting the pressure on internal and external auditors trying to make the linkages.</p> <p>E. g. all relevant legal requirements are addressed through the standard, not just in 1.1. need to cross reference more effectively.</p>	<p>he PEFC assessment focuses on the content of the national forest management standard while the structure of the standard is left to the national standardisation body.</p> <p>The comment should be address by the standardisation body directly during the standard setting process.</p>
<p>Group schemes are exempted from quite a few indicators, where we feel they should be required to adhere to these in one way or another. The verification / guidance sections should allow for this.</p> <p>Numerous examples in document to be emailed separately.</p>	<p>SAFAS 4 does not exempt the group schemes from the requirements. However, it allows that the conformity is demonstrated at the level of the group rather than at the level of an individual forest owner.</p> <p>This approach is justifiable in case of small size ownership and is allowed by PEFC ST 1003.</p>
<p>Some of the indicators are so broad that it will be difficult if not impossible to audit, or a strong likelihood that there will always be findings against a specific indicator as there is so much included in that indicator that any one thing could trigger a non-conformance</p>	<p>The standard was tested in the field with positive results. However, the issue needs to be discussed during the in-country visit.</p>
<p>The standard needs to be improved to ensure effective management system in place, and the effectiveness of implementation of the management system. I.e. Need to orientate the V & G to reflect how one audits (i) the documentation / understanding of the management system, (ii) the implementation of the management system, and (iii) whether they are having the desired effect on the ground (speaks to monitoring point above).</p>	<p>The assessment is mainly focused on compliance with the PEFC Council requirements.</p> <p>The comments should have been properly addressed during the standard setting process.</p>

Annex G: Stakeholders survey (FORM used in the survey)

TJConsulting, Luxembourg

Stakeholders' questionnaire

Assessment of the SAFAS forest certification scheme against the requirements of the PEFC Council

22 March 2018

Background

The SAFAS standard for sustainable forest management was submitted for endorsement by the PEFC Council.

The PEFC Council has selected TJConsulting to carry out the assessment of the standard and the SAFAS scheme against the PEFC Council requirements. The scheme assessment also includes consideration of stakeholders' comments and views presented within the international consultation announced by the PEFC Council at its website (www.pefc.org) and **this questionnaire that was directly distributed to stakeholders relevant to sustainable forest management in South Africa.**

TJConsulting would like to encourage all relevant stakeholders to provide information that will contribute as a valuable input necessary for the credible and impartial assessment of the SAFAS scheme.

Stakeholders are free and encouraged to further distribute the questionnaire to another stakeholders in South Africa.

Objective

This questionnaire aims at obtaining and considering stakeholders comments and views relating to the development and revision of the SAFAS scheme, in particular its forest management standard with requirements for forest management, its openness, transparency, stakeholder's participation and consensus building elements.

The questions used in this questionnaire are based on PEFC requirements included in PEFC ST 1001:2010 (Standard setting procedures – Requirements).

The questionnaire shall be returned to TJConsulting (tymrak@tj-consult.com) by **22 April 2018**. In case of an additional time needed, please contact Mr Tymrak directly.

Questionnaire

1. Contact details

Name of the organisation:

Stakeholder group:

E-mail:

2. Have you noticed a public announcement made by SAFAS Council relating to the start of the development/revision of the SAFAS scheme and invitation of stakeholders to participate?

- Yes No
- at the SAFAS or related website
- by SAFAS or related body's press release
- at public magazine and media
- by direct mailing

Note:

3. Did you have access to the standard setting procedures/ rules for the development of the SAFAS forest management standard?¹⁰

- Yes No

Note: Yes

4. Have you been invited to nominate your representative to SAFAS working group (other stakeholder bodies responsible for the revision of the standard(s) and consensus building)?¹¹

- Yes No
- by general invitation at the website, in media, etc.
- by direct mailing or other communication
- We have made a nomination that was
- accepted
- rejected

Note:

¹⁰ A written document containing organisation and procedures of the standard setting/revision process.

¹¹ PEFC requires that the standardisation body shall establish a working group/committee with responsibilities for the development of a standard(s) and consensus building that is (i) accessible to stakeholders; (ii) has balance representation of stakeholders decision making and (iii) includes stakeholders with expertise in the subject matter and materially affected stakeholders (PEFC ST 1001:2010, 4.4).

5. Have you noticed the public consultation on a draft SAFAS forest management standard/scheme?

- Yes No
- at the website
- by SAFAS or related body's press release
- at public magazine and media
- by direct mailing

Note:

6. Have you made comments during the public consultation and have they been considered?

- Yes, we have submitted comments No, we have not submitted comments

Our comments:

- were considered
- were not considered

Note:

7. Have you submitted any complaint relating to the standard setting/revision process?

- Yes No

Note: [Click here](#) to enter text.

For those stakeholders that had their representative in a SAFAS working group

8. Has the work of the SAFAS working group been organised in an open and transparent way?¹²

Yes

No

Note:

9. Have stakeholders reached the consensus on the content of the SAFAS forest management standard?

Yes

No

Note:

Other comments

9. Other comments and views on the SAFAS standard setting/revision process or content of the scheme?

¹² PEFC Council requires that members of the working group/committee responsible for the development of a standard(s) shall have access to draft documents in a timely manner; shall be given opportunity to participate in its work and submit their comments; their comments shall be considered in a transparent way.

Annex H: Report from visit to South Africa

The visit to South Africa was conducted by Mr Jaroslav Tymrak during four days from 8 to 11 May 2018.

Objective of the visit

The objective of the visit was:

- Gathering additional information on the standard setting process and verification of the information submitted as a part of the scheme application, mainly through interview of the applicant's office, office of SGEN that was responsible for the standard setting and relevant stakeholders' interview;
- Evaluation of organisational relationships and tasks of different bodies involved in the implementation of the scheme.
- Clarification of issues and non-conformities identified in the interim report.

Programme and timetable of the visit

Date	8 May 2018	9 May 2018	10 May 2018	11 May 2018
Day	Tuesday	Wednesday	Thursday	Friday
Itinerary	Meeting with the SAFAS Council Introduction Presentation of findings of the draft interim report Clarification of issues and non-conformities identified in the draft interim report	Visit to local traditional community Stakeholders meetings	Stakeholders meetings	Meeting with the SAFAS Council Clarification of issues and non-conformities identified in the draft interim report Closing meeting

Stakeholders visited and interviewed

Mr Tymrak met during the South Africa's visit a large number of stakeholders relevant to the SAFAS process. Due to the time limitations of the visit, individual organisations could not be interviewed individually, but were grouped based on their common interest to ensure openness of the discussion.

The main topic of the discussion was the SAFAS standard setting process and their participation in the process as well as general affiliation with the SAFAS Council. The meetings also focused on topics relating to the scheme that are relevant and of interest of the particular stakeholder group.

The following organisations have been met and interviewed:

SAFAS Council	Graig Norris (NCT)
	Steve Geimishuizen (consultant)
	Dave Everard (Chairman SAFAS Council)
Ozwathini community	Sanele Ngobo (a member of the WG, consultant)
	Bongani Phama
	Gilbert Plant (community project facilitator)
Forest Industry	
Bracken Timbers	Murray Mason
Mark Armour	HTT
NCT	Danny Knoesen
	Philip Day
	Norman Dlamini
	Vusi Dladla
SAPPI	Terry Stanger
	Vishal Rugbeer
	David Everard
	Patrick Kime
	Johan Coetzer
NTE	Harold Niehbur
farmer	Niel Engelbreght
Forestlore	John Scotcher
Forestry South Africa	Norman Dlamini
	Graham Freese
TWK	Ferdie Braachman
Mondi	Brent Corcoran

Research community	
ICFR	Andrew Morris
TPCP	Bernard Slippers
NMMU	Keith Little
SAIF	Rob Thompson
	Hannel Ham
University of KZN (Durban)	Cathy Sutherland
Government	
Department of Agriculture, Forestry and Fisheries	Mmakwena Maleku
E-NGOs	
WWF	Hlengiwe Ndlovu
Other stakeholders	
African Certification and Testing	Pierre Tullis



TJConsulting

Woodmotion