

TJConsulting, Luxembourg

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

Final report

5 December 2017

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Abbreviations

CNVP	Connecting Natural Values and Peoples, an NGO
EA	European co-operation for Accreditation
FMP	Forest Management Plan
IAF	International Accreditation Forum
ISO	International Standardisation Organisation
PEFC	Programme for the Endorsement of Forest Certification
PEFCC	PEFC Council
PoE	Panel of Experts
SFM	Sustainable Forest Management
WG	Working group
WHO	World health Organisation

1 Background

The Council for SFM in Macedonia (here-in-after “the applicant” or “the Council for SFM”) 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 1007:2012, 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 Macedonian scheme against the PEFC Council's requirements, TJConsulting recommends to the Board of Directors to endorse the Macedonian scheme on the condition that the following minor non-conformities¹ relating to the group certification (5), (6); the forest management standard (7), (8) and requirements for forest management certification bodies (9) are resolved no later than six months from the endorsement:

- (5) Consideration of non-conformities in case of multiple forest certifications (PEFC ST 1002, 4.1.2);
- (6) Commitment of the group entity on behalf of the group organisation (PEFC ST 1002, 4.2.1b);
- (7) Forest conversion (PEFC ST 1003, 5.11)
- (8) Usage of pesticides / WHO Type 1A and 1B (PEFC ST 1003, 5.2.9)
- (9) Certification body to carry out control of the PEFC Logo use (Annex 6)

¹ The numbering of the minor non-conformities (a number in brackets) follows chapter Executive Summary of the report. TJConsulting does not recommend to resolve the minor non-conformities (1), (2), (3) and (4) relating to the standard setting process as this would require the applicant to repeat a significant part of the standard setting revision 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

Standard setting procedures

The standard setting is governed by MK 02 (Standard setting and revision procedures) that is largely based on PEFC ST 1001 and MK 07 (Dispute settlement procedures).

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

Standard setting / revision process

The standard setting process lasted from 2015 to 2016 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 **minor non-conformities**:

- (1) Accessibility of the WG to stakeholders (PEFC ST 1001, 4.4a): The process didn't allow sufficient time between the formal announcement of the standard setting process and the first WG meeting that would allow stakeholders to consider the invitation and make their nomination;
- (2) Announcement of the start of the standard setting shall be done in a timely manner and at the website (PEFC ST 1001, 5.3)
- (3) Announcement of public consultation to be made at suitable media – website (PEFC ST 1001, 5.6a)
- (4) Pilot test to be organised in the field (at the FMU or another level) (PEFC ST 1001, 5.7).

TJConsulting does not recommend that the minor non-conformities (1), (2), (3) and (4) 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 revision 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 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 Macedonia. The requirements for group certification are defined in MK 06 (Group certification rules and procedures).

The scheme documentation for the group certification **complies** with the PEFC requirements (PEFC ST 1002) except the following **minor non-conformities**:

- (5) Consideration of non-conformities in case of multiple forest certifications (PEFC ST 1002, 4.1.2);
- (6) Commitment of the group entity on behalf of the group organisation (PEFC ST 1002, 4.2.1b);

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

5.3 Sustainable forest management standard

The requirements for sustainable forest management are defined in MK 03 (National Standard for Sustainable Forest Management).

MK 03 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.

MK 03 **complies** with the requirements of PEFC ST 1003 except for **two minor non-conformities**.

(7) Forest Conversion (PEFC ST 1003, 5.1.11)

MK 03 defines requirements that are restricting forest conversion, including conversion of forests to forest plantations. The requirements are nearly identical to PEFC ST 1003 but:

- the criteria for "justified" conversion are missing the scale element (PEFC ST 1003, 5.1.11b);
- the reference to legislation concerning the verification of the compliance with MK 03 is not fully consistent with the conditions for "justified circumstances" and makes those conditions void;
- the legislation provided by the applicant^[19] does not sufficiently address the PEFC requirements as
 - (i) it does not relate to the conversion of forests to forest plantations;
 - (ii) it does not include provisions relating to the scale of the conversion. The fee defined by the legislation is not high enough to regulate the size of the conversion and it only applies to 2 specific cases of allowed forest conversion (out of six).

(8) Pesticides WHO (PEFC ST 1003, 5.2.9)

MK 03 prohibits the use of pesticides classified as WHO Type 1A and 1B. MK 03 also allows exemptions that are based on permissions issued by the PEFC Council. However, the PEFC Council does not have a mechanism for the approval of derogations from the prohibited pesticides.

The note to PEFC ST 1003, 5.2.9 also includes a text that “Any exception to the usage of WHO Type 1A and 1B shall be defined by a specific forest management standard”. This expects the standard to define any exception from the WHO 1A and 1B prohibition.

Details about the assessment and the scheme compliance can be found in chapter 8.4 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 MK 04 (Certification and Accreditation Procedures).

The scheme’s requirements for certification bodies, their accreditation and notification **comply** with Annex 6 of the PEFC Technical Document, except for one **minor non-conformity**:

- (9) Neither MK 04 nor MK 05 (Notification procedures) requires the certification body to carry out controls of the PEFC Logo usage where the certified entity uses the PEFC Logo.

Details about the assessment and the scheme compliance can be found in chapter 8.6.2 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 1007:2012 Endorsement and Mutual Recognition of National Systems and their Revision

PEFC IGD 1007-03:2012 The Assessment Report

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

Clarification: Assessment report (31 October 2012)

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.

Submitted scheme documentation (approved by the applicant on 5 September 2017)

PEFC MK 01:2017	Macedonian forest certification scheme description
PEFC MK 02:2017:	Standard setting and revision procedures
PEFC MK 03:2017:	National Standard for Sustainable Forest Management
PEFC MK 04:2017:	Certification and accreditation procedures
PEFC MK 05:2017:	Requirements for notification of certification bodies
PEFC MK 06:2017:	Group certification rules and procedures
PEFC MK 07:2017:	PEFC Logo Usage Rules
PEFC MK 08:2017:	Dispute settlement 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
- Checklist of the PEFC Council
- Scheme description & development report

Additional evidence submitted on 19 May 2017

(Referenced in the report)

- [1] Statutes of the Council for SFM, 11/1/2016
- [2] Announcement of the standard setting process in daily newspaper DNEVNIK on 23/5/2015 (original in a Macedonian language with English translation)
- [3] Copies of emails sent to stakeholders on 18/5/2015, 21/5/2015, 25/5/2015 and 26/5/2015 (in Macedonian language)
- [4] Stakeholders mapping document

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.

- [5] Applicant's statement relating to the comments received after the standard setting process announcement
- [6] Explanation relating to the establishment of the WG
- [7] Declaration of initial WG (January 2015)
- [8] Explanation relating to the work of the WG
- [9] Announcement of the public consultation (English translation)
- [10] Announcement of the public consultation at the applicant's Facebook
- [11] Direct mail with an announcement of the public consultation
- [12] A list of participants at the workshop of 19/7/2016
- [13] Changes to the SFM standard resulting from the workshop of 19/7/2016
- [14] E-mail correspondence with WG members including a vote on final draft standard (19/7/2016, with English translation)
- [15] Minutes of the Assembly of the Council of SFM (2 September 2016, Macedonian only)
- [16] E-mail correspondence relating to the WG meetings of 4/6/2015, 16/6/2015, 23/6/2015, 2/7/2015 and 1/3/2016.

Additional evidence submitted on 13 September 2017

(Referenced in the report)

- [17] Rule book for the development of forest management plans
- [18] Content of management plans for small forest owners
- [19] Responses to the draft interim report
- [20] Chronology of the standard setting process

7 Methodology and timetable

7.1 Scope of the assessment

The assessment was carried out based on PEFC GD 1007:2012, the tender dossier of 17 January 2017 and the TJConsulting's tender proposal of 12 February 2017.

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 IGD 1007-03:2012, the tender dossier of 17 January 2017 and the tender proposal of 12 February 2017.

The assessment was interrupted based on a request from the applicant for the period of July to September 2017.

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 15 May 2017. 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	15 May 2017
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	12 June 2017
Comment period	The draft interim report was made available to the applicant and the PEFC Council for comments	Responses to the Interim report	12 June – 18 Sep 2017
Visit to Macedonia	Stakeholders' interview and clarification of non-conformities	Country visit report	19-22 June 2017

Stage 2 assessment	Evaluation of responses to the draft interim report and changes to the documentation	Draft final report	18 Sep – 2 Oct 2017
Public consultation	The PEFC Council invited stakeholders to comment on the scheme	Stakeholders comments	17 Jan – 18 March 2017
Panel of Experts (PoE) review	A Panel of Experts appointed by the PEFC Council reviewed the final draft report and provided comments to the report	Comments from PoE	2 Oct – 24 Nov 2017
Consideration of the Panel's comments	Consideration of PoE comments and amendments to the report	Final report	24 Nov – 28 Nov 2017

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 7.2.2.4.1.2 of PEFC GD 1007:

Major non-conformity: A major non-conformity violates the integrity of the certification system and has to be corrected before the endorsement of the system.

Minor non-conformity: A minor non-conformity does not violate the integrity of the certification system, and is not a bar to endorsement. The assessor recommends appropriate corrective action. Generally, a minor non-conformity should be corrected within 6 months. The assessor may recommend a longer period where justified by particular circumstances.

Conformity: A procedure described by the scheme documentation fully meets the particular requirement of the PEFC Council.

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 Assessment of the structure of the scheme

8.1.1 Structure of the scheme's documentation

The PEFC Council does not have any requirements relating to the structure of national forest certification schemes. Therefore, the text below illustrates the overall context and some implementation issues relating to the structure and clarity of the scheme's documentation.

According to PEFC MK 01 the scheme consists of the scheme description document (PEFC MK 01 and additional "Appendices and Annexes" as indicated in the next table. In addition, PEFC MK 01 also makes reference to PEFC ST 2002:2013 as the standard for chain of custody certification that was adopted by the applicant.

Table 2: Structure of the scheme documentation

PEFC MK 01:2017	Macedonian forest certification scheme description
PEFC MK 02:2017:	Standard setting and revision procedures
PEFC MK 03:2017:	National Standard for Sustainable Forest Management
PEFC MK 04:2017:	Certification and accreditation procedures
PEFC MK 05:2017:	Requirements for notification of certification bodies
PEFC MK 06:2017:	Group certification rules and procedures
PEFC MK 07:2017:	PEFC Logo Usage Rules
PEFC MK 08:2017	Dispute settlement procedures

8.1.2 Organisational arrangement

The scheme separates the standard setting, certification and accreditation functions by the following organisational arrangement.

The Council for Sustainable Forest Management in Macedonia is the governing body of the scheme and represents the scheme in the PEFC Council. It is also responsible for the formal approval of the scheme documentation, scheme administration, i.e. notification of certification bodies, and dispute settlement..

Certification bodies are responsible for assessing conformity of forest owners/managers that are applying for forest management certification and for assessing conformity of wood processing companies applying for chain of custody certification. The certification bodies are required to be accredited by a national accreditation body that is a member of IAF/EA (PEFC MK 04, for more detail see chapter relating to the assessment of forest management and chain of custody certification bodies).

Accreditation body is responsible for assessing the certification body's conformity with ISO 17065 or ISO 17021 in case of forest management certification and ISO 17065 in case of

chain of custody certification (PEFC MK 04, for more detail see chapter relating to the assessment of forest management and chain of custody certification bodies).

8.1.3 Observation relating to the structure of the scheme

The PEFC Council has no requirements for the structure of the scheme and the following observation should not have an impact on the endorsement of the scheme (unless specified in the compulsory chapters of the scheme):

- a) The structure and identification of documentation is not clear. PEFC MK 01 considers this document (Description of PEFC Macedonian Forest Certification Scheme) as the key document while other documents (PEFC MK 02 – PEFC MK 07, PEFC Standard and Requirements Checklist and the Statutes) as “Appendices and Annexes”. This logic of the documentation hierarchy is not supported by the documentation identification³. It is also not clear why “the Checklist” should be a part of the “scheme’s technical documentation” as it is a document supporting the application for the PEFC endorsement.
- b) All documents (PEFC MK 01-07) are missing basic identification of who and when formally approved the documents.
- c) The language of PEFC MK 01 is lacking consistency with terminology and general understanding of the conformity assessment processes as defined by ISO 17000 series. This results in ambiguity of the document text. Some examples from PEFC MK 01 are given below:

“Certification body is an independent body accredited by the National Accreditation for the Implementation of Procedures of Sustainable Forest Management Certification and/or Chain of Custody of Forest Based Products certification”⁴.

“The requirements for auditors of sustainable forest management and/or chain of custody of Forest Based Products are given in PEFC MK 03:2016 and PEFC ST 2002:2013”.

“The requirements to be met by the applicant for auditing of sustainable forest management are given in PEFC MK 03:2016”.

- d) PEFC MK 01 (Scheme description) identifies PEFC MK 02 as “Standard setting procedures and Chronology of standard setting process”. However, the title given in PEFC MK 02 is “Development and revision of Macedonian documents for forest certification system”. In addition, PEFC MK 02 does not include chapters describing the “chronology of the standard setting process”. The standard setting process (2015-2016) is described in PEFC MK 01.
- e) It is not clear why PEFC ST 2001 has been adopted with a scheme specific identification number PEFC MK 07 but for the chain of custody standard the scheme makes reference to its original international identification (PEFC ST 2002). As the document (PEFC MK 07) is lacking the first two pages, it is impossible to find out that the document is identical with PEFC ST 2001.

³ PEFC MK 01, chapter Contents

8.2 Requirements for standard setting

8.2.1 Introduction and summary

Macedonian forestry

The total forest land in the Republic of Macedonia is 11,596 km² (1,159,600 ha) out of which forests are 947,653 ha. The total standing wood volume is 74,343,000 m³, and the total annual increment is 1,830,000 m³ with average annual increment per hectare of 2.02 m³. With the help of the Afforestation Fund (that was active until 1990) more than 140,000 ha of bare lands were planted.

90.14% of the total forest area is state owned forest, while their part of the total wood mass is 92.2%. Private owned forests are 9.86% (94,146 ha) of the total forest area, and their portion of the total standing volume is 7.8%.

Forestry in Macedonia is an economic branch that participates in the Gross Domestic Product with 0.3 - 0.5%, but if the multifunctional uses are valorised, the contribution would increase. The contribution of the forest industry (primary and secondary wood processing, furniture, paper and celluloses...) is 2.5 - 3%.

The planned annual available cut in the Republic in Macedonia in the last 10 years is about 1,300,000 m³, out of which around 70% has been harvested. From the harvested timber, 80 to 85% is firewood.

Forests in the Republic of Macedonia are characterized in very rich biodiversity. Macedonia has significant non-timber forest resources: medicinal plants, mushrooms, forest fruits etc. and diverse game. The importance of forests is emphasized by the fact that the main part of the territory of the protected areas in this country is covered by forests. Some of the main threats and problems in forest management and governance are: illegal logging that takes huge proportions, other illegal activities, forest fires which have affected nearly 100,000 ha for the last 10 years, climate changes through the process of drying of the forests, insect calamities and diseases. All these lead to enormous economic and environmental losses to the sector.

History and objectives of the Macedonian Forest Certification Scheme

The Macedonian Forest Certification Scheme is a national forest certification scheme that is owned and governed by the Council for SFM, a Macedonian non-for-profit and multi-stakeholder organisation established in 2016.

The Scheme has been developed based on PEFC requirements with an ambition to comply with the PEFC requirements and to receive PEFC endorsement.

The main objectives of the scheme as described in MK 01 is

“to increase the contribution of the forestry sector to the national economy and rural development through sustainable forest management, ensuring renewable resources and protection of local and global environment, and providing products and services for improving the quality of life of all citizens.”

The scheme development started in 2015 and was completed in autumn 2016 by a formal adoption of its core documentation. Shortly after that in December 2016 the scheme was submitted for PEFC endorsement.

Standard setting procedures

The standard setting and revision process is primarily governed by MK 02 that is largely based on PEFC ST 1001. The scope of the document refers to the “documentation” of the scheme but the wording of the document is then limited to the development of a forest management standard.

It describes the Council for SFM as the scheme owner and the standardisation body. The document also establishes other bodies such as a Commission/WG that is responsible for the consensus on the forest management standard (MK 03) and Appeal Settlement Body that is responsible for resolving complaints and appeal relating to standard setting activities.

MK 02 describes the standard setting process consisting of:

- a) Proposal stage (standard setting proposal; stakeholders mapping);
- b) Preparatory stage (announcement of the standard setting process, establishment of a Commission/WG and development of a first draft);
- c) Development stage (work of the Commission/WG);
- d) Research stage (public consultation and pilot testing);
- e) Approval stage (development report and formal approval);
- f) Publication stage;
- g) Revision.

The assessment of the standard setting procedures is based on the submitted version of MK 02. It should be noted that MK 02 was only approved at the end of the standard setting process in April 2016 and then revised in September 2017 (to resolve non-conformities of the draft interim report of this evaluation). Therefore, it is evident that this version of the document was not governing the process itself that formally started in May 2015. This fact provides explanation of a number of logical discrepancies in this assessment between the written procedures and the description of the revision process itself.

Dispute settlement procedures

The dispute settlement procedures are described in the Statutes of the Council for SFM^[1], Articles 18-20 and MK 08 (Dispute settlement procedures). The documents include provisions for dealing with appeals and complaints, including those dealing with the standard setting/revision process.

The Statutes and MK 08 establish a permanent Appeal settlement body consisting of three members that is required to investigate and make decision upon formally received complaints and appeals.

The applicant claims that during the standard setting process it has received no formal complaints or appeals.

Commission / Working group for the development of SFM standard

MK 02 requires that the WG is established by the Assembly of the Council for SFM based on nominations of relevant stakeholders. It should be noted that the WG has been established and started its work in May 2015 following activities of an “initial working group” that performed preparatory work between January 2015 and June 2015. The “initial working group” was also responsible for the creation of the WG as the formal standardisation body (the Council for SFM) was only set up in January 2016.

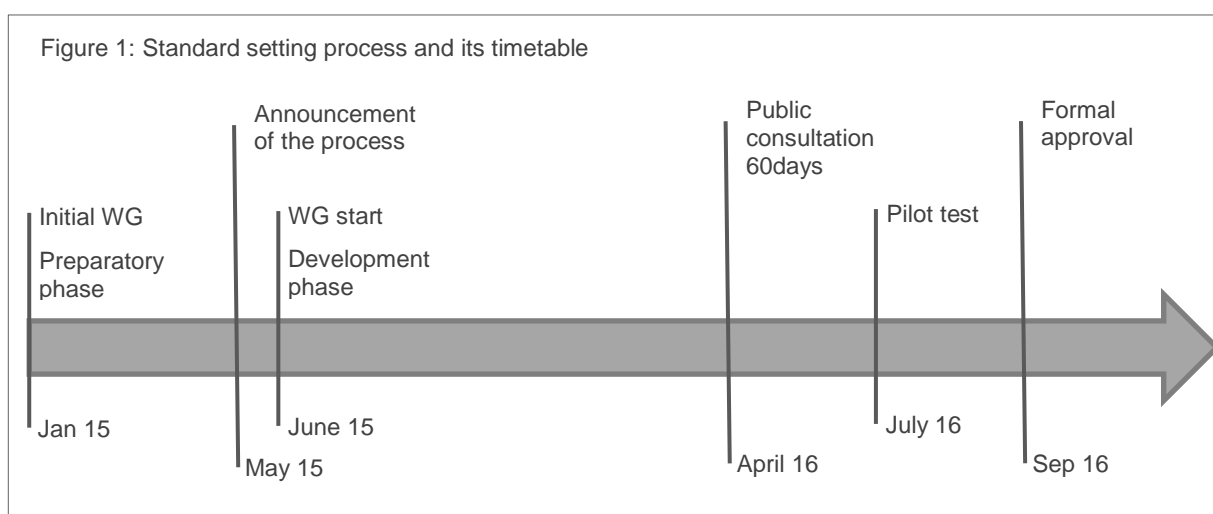
- a) The WG consists of 13 members, representing state forests (1), private forest owners (1), wood processing industry (2), state administration (1), national parks (3), forestry educational institutions (2), forestry students organisation (1), labour union (1), environmental NGO (1).
- b) Out of nine major stakeholder groups (PEFC ST 1001, 3.9), the WG includes 7 while indigenous people are not relevant to Macedonia and it is expected that “women’s interest is also represented by female representatives in the WG.
- c) The working group covers economic interest (4), environmental interest (4) and social interest (1). It is assumed that no prevailing interest exists for stakeholders such as educational institutions, governmental authorities or students.

The composition of the WG is shown in Annex 1 to the report.

Standard setting process

The standard setting process started in January 2015 by in an informal capacity by creating an initial WG. Formally, the start of process was announced in May 2015 and was completed by formal adoption of the SFM standard in September 2016, respectively in November 2016 by formal adoption of the complete documentation of the scheme.

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



Initial WG

The standard setting process was initiated in January 2015 by an Initial WG that consisted of six key stakeholders who signed a Declaration to develop a forest certification scheme based on requirements of the PEFC Council and with the ambition to receive the PEFC scheme endorsement. The role of the Initial WG was to (i) develop standard setting procedures; (ii) carry out the stakeholders mapping, (iii) formally launch the process and (iv) establish a formal WG.

Stakeholders mapping

The stakeholders mapping^[4] identified 26 stakeholder organisations in three main sectors (economic, environmental and social) and includes their brief description.

The stakeholders mapping only focuses on “key” and “marginalised” stakeholders as 26 stakeholders were considered either as “key or “marginalised”.

For “marginalised” stakeholders (non-wood forest products pickers and seasonal workers) it includes constraints for their participation, mainly an informal and unorganised structure and ways of communication to resolve the constraint. For all stakeholders, the document describes means of communication, including public media, websites of partners’ organisations and direct communication.

Announcement of the standard setting process

The standard setting process was formally announced in May 2015 by three communication channels:

- a) Publication of an announcement in the daily newspaper DNEVNIK (23/5/2015) ^[2],
- b) Email communication (18, 21, 25 and 26 May 2015) ^[3],
- c) Announcement at the CNVP website.

The most comprehensive announcement that included (i) the objective of the standard setting, its scope and timetable, (ii) invitation of stakeholders to nominate their representative to the WG; (iii) information about stakeholders opportunities to participate; (iv) reference to the standard setting procedures and (v) invitation to comment on the proposed process.

E-mail communication was focused on the key and marginalised stakeholders identified in the stakeholders mapping and included reference to the “DNEVNIK newspaper” announcement.

The claimed announcement at the CNVP website could not be found and as such was not considered in the assessment.

Open and transparent work of WG

The formal WG established in the beginning of June 2015 and worked on the SFM standard until July 2016. During this period it had 5 meetings (4 in June 2016) and two electronic votes (March and July 2016).

The 13 members of the working group were invited for the meetings by E-mails that included a draft document from the last meeting with marked changes proposed, discussed and approved by the WG.

Public consultation

Public consultation was carried out between 27 April 2016 and 5 July 2016. The public consultation was communicated by:

- announcement at the Facebook^[9, 10];
- direct e-mails distributed to stakeholders (15) identified in the stakeholders mapping^[11].

The Facebook community includes about 150 followers (1 June 2017).

The applicant's official website (www.pefc.mk) includes the forest management standard (<http://pefc.mk/images/Kil.pdf>) and comment form. However, it does not include the announcement of the public consultation itself.

The applicant claims that during the public consultation no comment was received. This was also confirmed by stakeholders interviews held during the in-country visit.

Pilot testing

A pilot test was organised in July 2016 as a workshop with the participation of experts, members of the WG and an FSC auditor (Soil Association, a FSC certification body)^[12]. The objective of the workshop was to evaluate the applicability of the draft SFM standard. The workshop resulted in a number of proposals for changes to the SFM standard^[12].

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

The decision to submit a final draft standard for a formal approval was taken by the WG on 19/07/2016 in a postal (electronic) ballot. All 13 members of the WG voted in favour of submitting the final draft standard for the formal approval without any comments^[14]

Formal approval of the SFM standard and its publication

The final draft (2nd) of the SFM standard was unanimously adopted by the Assembly of the Council for SFM on 2nd September 2016^[15].

Results of the evaluation

The **standard setting procedures** (MK 02) fully comply with the PEFC requirements for standard setting (PEFC ST 1001).

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

- Accessibility of the WG to stakeholders (PEFC ST 1001, 4.4a): The process didn't allow sufficient time between the formal announcement of the standard setting process and the first WG meeting that would allow stakeholders to consider the invitation and make their nomination;
- Announcement of the start of the standard setting shall be done in a timely manner and at the website (PEFC ST 1001, 5.3)
- Announcement of public consultation to be made at suitable media – website (PEFC ST 1001, 5.6a)

- Pilot test to be organised in the field (at the FMU or another level) (PEFC ST 1001, 5.7).

Observations (not causing non-conformity with the PEFC requirements)

Scope of the standard setting procedures (MK 02)

The scope of MK 02 is not clearly defined. Chapter Scope (1) refers to the development of documents of the scheme while the work of the critical body in the process (the Commission/WG) and other provisions are only limited to the “SFM measures and indicators”.

Identification of documents during the standard setting process

During the standard setting process the SFM standard has not been properly identified by its identifier (MK 03) or draft version of the document. It is also assumed that the document was formally adopted without those elements on 2 September 2016 and this was only added when other parts of the scheme were formally adopted in November 2016.

Responsibility for keeping records

The responsibility for records keeping and other administrative tasks is given to the Assembly, the highest decision-making body of the Council for SFM that consists of “external stakeholders”. It is rather impractical to expect that such body would carry out the administrative tasks.

Minutes of the meetings

No formal minutes of the WG has been kept. Instead, the WG decided to only record a participants list and distribute a draft standard with marked changes proposed, discussed and adopted by the previous WG.

Publication of standards

The date of the SFM standard (MK 03) cannot be verified as the document itself does not include a date of publication.

Application and transition date

The description of the application and transition date is confusing and ambiguous (PEFC ST 1001, 6.3 and 6.4).

8.2.2 Stakeholders interview

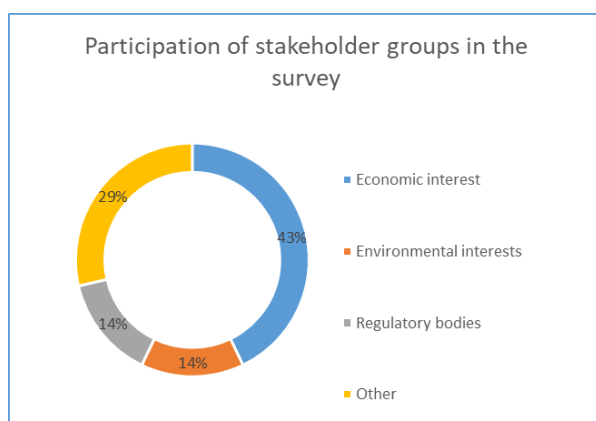
TJConsulting distributed a questionnaire to more than 25 stakeholders in Macedonia that covered all stakeholder groups relevant to sustainable forest management with a request to provide feedback on the standard setting/revision process of the Macedonian scheme.

TJConsulting provided stakeholders with a 5 weeks response period between 12 May 2017 and 15 June 2017 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 responses received as well as the fact that all respondents were actively participating in the WG that was developing the forest management standard

The questionnaire used in the survey is shown in Annex 3 to this report.

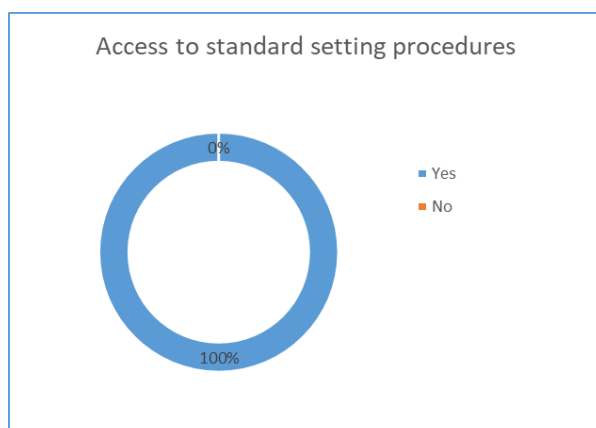
Participation in the stakeholders' survey

7 stakeholders submitted their responses representing the main stakeholder groups.



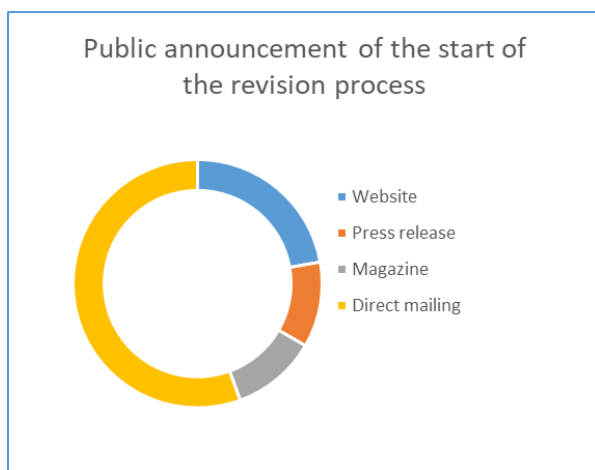
Access to standard setting procedures

All respondents (7) indicated that they had had an access to the standard setting procedures.



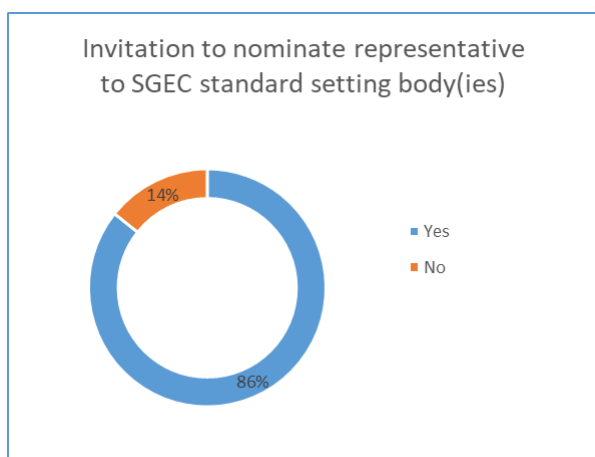
Public announcement of the start of the revision process

Majority of respondents (6) responded that they had noticed the public announcement of the start of the revision process. Majority of them received the information through a direct mailing.



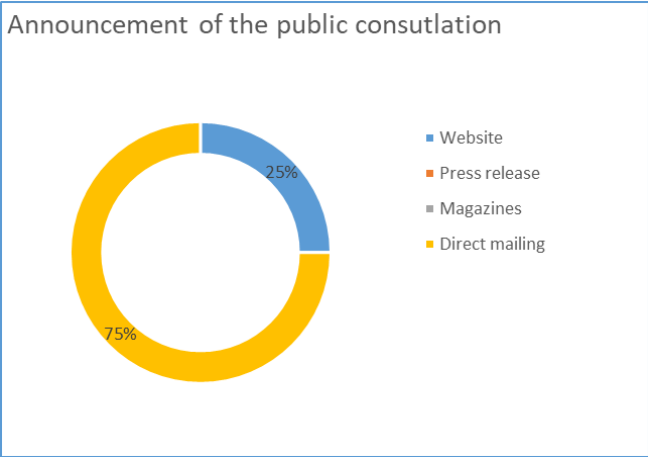
Invitation to nominate representatives to the WG

The majority responses (6) indicated that they had received an invitation to participate in the WG that was responsible for the development of the forest management standard. One respondent has provided an answer that he was not invited although he participated in the WG.



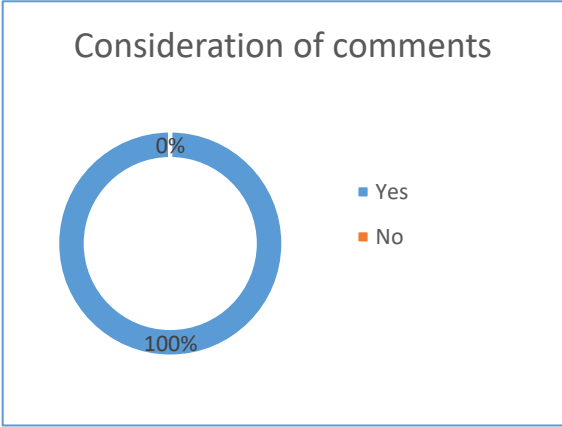
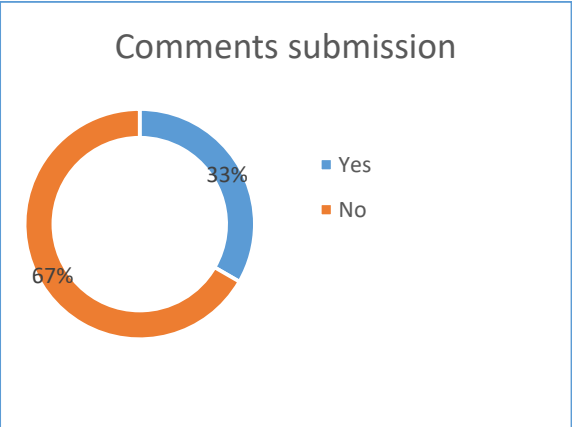
Announcement of the public consultation

Majority of respondents (6) indicated that they had noticed an announcement of the public consultation; website and direct mailing were quoted as the main communication channel.



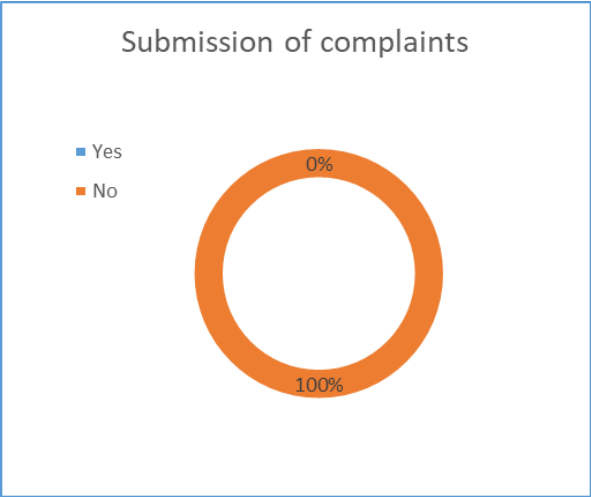
Consideration of comments from public consultation

Two (2) stakeholders indicated that they had submitted comments during the public consultation and that their comments have been considered. However, further enquiry found out that the comments were submitted as a part of the WG activities rather than during the public consultation.



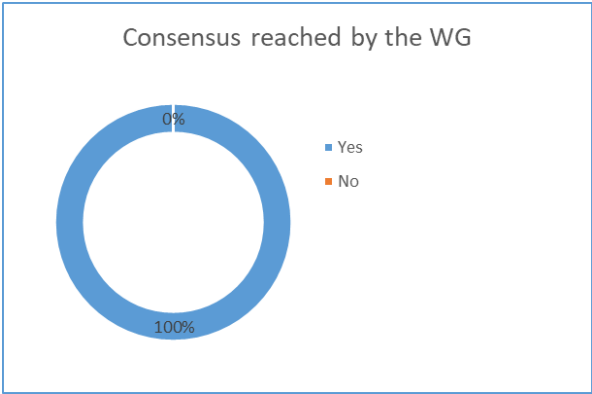
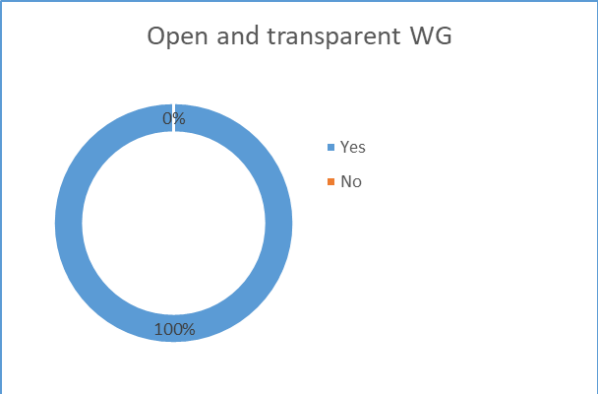
Submission of complaints

All respondents (7) indicated that they had not submitted a complaint relating to the standard setting / revision process.



Open and transparent work of the WG and consensus reached by the WG

All respondents who answered this question (6) confirmed that the work of the WG had been open and transparent and that the WG reached consensus.



8.2.3 Detailed assessment⁵

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>Formal adoption of the standard:</p> <p>The Statutes^[1], Article 13 states that the “ Assembly of the Council for SFM” is responsible for “acceptance of the certification scheme”.</p> <p>MK 02, chapter 4.1 defines the role of the Assembly in the formal approval of the [scheme’s] documents.</p> <p>Body responsible for consensus building</p> <p>The Statutes^[1], Article 21-24 defines the role of a Commission for the development and revision of a SFM standard.</p> <p>MK 02, chapter 4.4 defines the role of the Commission/WG in the development of the SFM standard and consensus building (chapter 5.3.2).</p> <p>Conclusion: Conformity</p> <p>Justification: The Statutes^[1] and MK 02 define the structure of the Council for SFM as the standardization body and its parts for the formal approval of documents (the Assembly) and consensus building (Commission/WG).</p> <p>Observation: MK 02 Scope is not clearly defined. Chapter Scope (1) refers to the development of documents of the scheme while the work of the critical body in the process (the Commission/WG) is limited to the “SFM measures and indicators”. It is not clear whether the procedures apply only to the SFM standard and how other documents are developed.</p>
b) the record-keeping procedures	Procedures	<p>MK 02 state procedures for records keeping.</p> <p>Compliance: Conformity</p> <p>Justification: MK 02 requires the keeping of records relating to the standard setting process.</p>
c) the procedures for balanced representation of stakeholders,	Procedures	<p>MK 02, chapter 4.4 defines procedures for the composition of the Commission/WG that is responsible for balanced representation of stakeholders and for consensus building.</p> <p>Compliance: Conformity</p> <p>Justification: MK 02 includes procedures for balanced representation of stakeholders.</p>

⁵ The numbers in brackets [] identify referenced documentation as listed in chapter 6

		It should be noted that this statement only reflects presence of procedures, not whether those procedures are appropriate or not.
d) the standard-setting process,	Procedures	<p>MK 02, chapter 5 includes procedures for the standard setting/revision process.</p> <p>Compliance: Conformity</p> <p>Justification: MK 02 includes procedures for the standard-setting process.</p>
e) the mechanism for reaching consensus, and	Procedures	<p>MK 02, chapter 5.3.2 includes procedures for consensus building within the Commission/WG.</p> <p>Compliance: Conformity</p> <p>Justification: MK 02 includes procedures for reaching consensus.</p> <p>It should be noted that this statement only reflects presence of procedures, not whether those procedures are appropriate or not.</p>
f) revision of standards/normative documents.	Procedures	<p>MK 02, chapter 6 includes procedures for the revision of standards.</p> <p>Compliance: Conformity</p> <p>Justification: MK 02, chapter 6 defines procedures for the revision of standards.</p> <p>It should be noted that this statement only reflects presence of procedures, not whether those procedures are appropriate or not.</p>

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>MK 02, chapter 5.2.1 requires that a public announcement for the start of the development/revision process shall also include a link to the publicly available standard setting procedures.</p> <p>Compliance: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
Process	<p>MK 02 is made publicly available at the standardization body's official website (http://pefc.mk/certification-scheme/?lang=en).</p> <p>Conclusion: Conformity</p> <p>Justification: The standard setting procedures (MK 02) are publicly available.</p> <p>Observation: The PEFC requirement as well as MK 02 expects that the standard setting procedures are available at the time of the formal announcement of the standard setting process. However, the link to a website with the standard setting procedures included in the formal announcement of the process^[2] is not accessible. Therefore, it is not possible to verify whether the standard setting procedures were publicly available at that time. In addition, it is not clear what version of standard setting procedures were referenced in the procedures as MK 02 is from 2016.</p>

PEFC ST 1001, 4.3	
<p>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.</p>	
Procedures	<p>MK 02, chapter 4.3 requires the Assembly to keep records on standard setting; chapter 8 includes an explicit list of records that shall be kept for a minimum of five years, including:</p> <ul style="list-style-type: none"> a) Proposal for standards setting, identifying stakeholders, list of invited stakeholders, b) Written documentation for establishing a WG, c) Notes from the Assembly meetings, d) Notes from WG meetings, including notes and proposals from WG members and public consultations as well as the changes made in the documentation, e) Results from reaching consensus and resolving disputes, f) Notes from meetings with stakeholders, g) Comments received from public consultation, h) Pilot testing results, i) Received appeals and complaints, j) Decision brought by the Disputes resolution body, k) Results from the Assembly voting, l) Development report, m) All versions of the standard along with the changes made to it elaborated in each of the development stages. <p>Compliance: Conformity</p> <p>Justification: MK 02 includes a comprehensive list of records to be kept that covers the whole standard setting process.</p> <p>Observation: The responsibility for records keeping and other administrative tasks is given to the Assembly, the highest decision-making body of the Council for SFM that consists of "external stakeholders". It is rather impractical to expect that such body would carry out the administrative tasks.</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> <p>TJConsulting has not received any information (either through the PEFC International public consultation or TJConsulting's questionnaire sent to stakeholders) that the standardisation body would reject any request for records to be made available.</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>The Statutes^[1], Article 21-24 defines the role of a Commission/WG for the development and revision of a SFM standard.</p> <p>MK 02, chapter 4.4 defines the role of the temporary Commission/WG in the development of the SFM standard and consensus building (chapter 5.3.2).</p> <p>Compliance: Conformity</p> <p>Justification: MK 02 defines and establishes a body responsible for the standard setting activities.</p>
Process	<p>The WG consisting of 13 stakeholders was created on 2/6/2015. Their composition is described under the following requirements (4.4a – 4.4.c) and presented in Annex 1.</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>MK 02, chapter 4.4 requires that “The WG should include representatives of stakeholders who have an expertise relevant to the standard’s content, stakeholders who are materially affected by the standard and those who can influence the application of the standard. The working group should include representatives nominated by: a) The Council for SFM and b) Other stakeholders”.</p> <p>MK 02, chapter 5.2.2 states that “...the Assembly is responsible for accepting or refusing the nominations of members in the WG. The acceptance or refusal of a nomination should be justified and match the balanced representation in the WG requirement as well as the available resources for the standards setting process...”.</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. MK 02 satisfies all three conditions.</p>
Process	<p>An “initial working group” consisting of representatives of six organisations⁶ was working from January 2015 to the beginning of June 2015. This initial working group met several time with the main task to (i) prepare a statutes of the Council for SFM, (ii) carry out the stakeholders mapping and (iii) prepare a first draft of the forest management standard. The initial working group also took initiative for invitation to stakeholders to nominate their representatives to the “formal” Working Group by:</p> <ul style="list-style-type: none"> a) Announcement in a daily newspaper Dnevnik on 23/5/2015^[2] and b) a direct e-mails to 25 stakeholders identified in the stakeholders mapping exercise (Description of the scheme and development report). Emails were

⁶ See Annex 1 for organisations participating in the initial working group

	<p>sent on 18/5/2015, 21/5/2015, 25/5/2015 and 26/5/2015. Some stakeholders were sent multiple emails^[3];</p> <p>In addition, the applicant claims that several phone calls have been made to inform stakeholders and to motivate them to join the Working Group.</p> <p>The deadline for submitting nominations was set up on 1/6/2015^[2] and the first meeting took place on 2/6/2015 (Description of the scheme and development report).</p> <p>Note: It should be noted that the establishment of the Working Group was not following the requirements of MK 02 as the Working Group was “self-established” and was not approved by the Assembly of the Council for SFM (the Council for SFM was only established in 2016).</p> <p>Compliance: Minor non-conformity</p> <p>Justification: The minor nonconformity has been assigned based on the fact that</p> <ul style="list-style-type: none"> a) the invitation was not communicated in a timely manner and did not provide stakeholders sufficient time to consider the invitation and to nominate their representatives to the Working Group; b) the public invitation was limited to the publication in one newspaper, no evidence has been presented that the announcement was published at the standardisation body’s website (see also PEFC ST 1001, 5.3).
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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>MK 02, chapter 4.4 defines four interest categories of the WG:</p> <p>“Stakeholder representation is divided in several interest groups:</p> <ul style="list-style-type: none"> a) The first interested group is of economy interest compiled by the forest managers, forest owners and forest industry. b) The second interest group is of environment sector compiled by the managers of areas of nature protection, NGOs working on environment, nature, tourism, recreation, sports etc. c) The third sector is of organizations / institutions from the social sector as labor, youth and women”. d) The fourth sector is of organizations / institutions representing interests of policy makers and education. <p>The balanced representation is supported by the principles of equity:</p> <p>“Procedures to secure the principle of equity are as follow:</p> <ul style="list-style-type: none"> a) For stakeholders from every interest group identified above there are at least three seats guaranteed for participation in the working group. b) During consensus building process every voice is equal”. <p>Conclusion: Conformity</p> <p>Justification: MK 02 provides for balanced representation of the WG by the definition of the four interest categories and by the distribution of seats and votes amongst the categories.</p>
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Process	<ul style="list-style-type: none"> - The WG consists of 13 members, representing state forests (1), private forest owners (1), wood processing industry (2), state administration (1), national parks (3), forestry educational institutions (2), forestry students organisation (1), labor union (1), environmental NGO (1). - Out of nine major stakeholder groups (PEFC ST 1001, 3.9), the WG includes 7 while indigenous people are not relevant to Macedonia and it is expected that “women’s interest is also represented by female representatives in the WG. - The working group covers economic interest (4), environmental interest (4) and social interest (1). It is assumed that no prevailing interest exist for stakeholders such as educational institutions, governmental authorities or students. <p>For membership in the WG, see Annex 1.</p> <p>Compliance: Conformity</p> <p>Justification: Taking into account the size of the forestry sector in Macedonia, the composition of the WG covers the main stakeholder’s categories and can be considered as balanced.</p>

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>MK 02 requires that “the working group should include representatives of stakeholders who have an expertise relevant to the standard’s content, stakeholders who are materially affected by the standard and those who can influence the application of the standard” and that “materially affected parties should constitute a significant part of all participants”.</p> <p>Compliance: Conformity</p> <p>Justification: The wording of MK 02 is identical with PEFC ST 1001.</p>
Process	<p>Annex 1 shows membership of the WG.</p> <p>Compliance: Conformity</p> <p>Justification: Forest landowners and industries, national parks and labor unions (those mainly affected by the standard and can influence its implementation) represent a significant proportion (8) of the WG.</p> <p>Strong representation of forest owners, research and academic institutions; as well as the state administration ensures sufficient expertise in the subject matter.</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>The Statutes^[1], Articles 18-20 include provisions for dealing with appeals and complaints, including those dealing with the standard setting/revision process.</p> <p>MK 02 makes a reference to those procedures in the Statutes and to the dispute settlement procedures (MK 08).</p> <p>The dispute settlement procedures (MK 08) are publicly available at the applicant's website (http://pefc.mk/certification-scheme/?lang=en).</p> <p>Compliance: Conformity</p> <p>Justification: The referenced documentation includes complaints resolution procedures. The key procedural document (MK 08) is available at the applicant's website.</p> <p>Observation: It should be noted that MK 08 has been developed as a response/corrective action to the draft interim report of this evaluation and as such was not available during the standard setting process itself.</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: Neither the stakeholders questionnaire nor interviews with stakeholders during the in-country visit indicate that a stakeholder submitted a complaint to the Council for SFM.</p>
PEFC ST 1001, 4.5	
4.5a [Upon receipt of the complaint, the standard-setting body shall]: a) acknowledge receipt of the complaint to the complainant,	
Procedures	<p>The Statutes^[1], Articles 20 states that "Upon receiving an appeal, the Appeal Resolution Body informs the sender of the appeal that the appeal was received".</p> <p>MK 08, page 2: "After receiving of appeal/complaint, the President informs the Appeal Resolution Body about receipt in period of one week. During this period the Appeal Resolution Body acknowledge receive of appeal/complaint to complainant in letter or through the email communication".</p> <p>Compliance: Conformity</p> <p>Justification: The reference documents satisfies 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: Neither the stakeholders questionnaire nor interviews with stakeholders during the in-country visit indicate that a stakeholder submitted a complaint to the Council for SFM.</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.	
Procedures	<p>The Statutes^[1], Articles 20 states that “Upon receiving an appeal, the Appeal Resolution Body informs the sender of the appeal that the appeal was received and responds to it within 60 days. In certain cases, this period can be extended for 30 days” and that “the decisions of the Appeal Resolution Body are brought by majority of votes Council for SFM is obliged to keep the records of appeals investigated. The decision of the Body is final”.</p> <p>MK 08, page 2: “After receive of appeal/complaint, the Appeal Resolution Body starts with procedure of gathering and verification of all necessary information that are relevant to the content of appeal/complaint. Based on the information gathered, the members of Appeal Resolution Body shall execute the process of evaluation and to decide if appeal/complaint is accepted or rejected. Evaluation process shall be executed on the principal of impartiality. The decision shall be brought in voting by majority of votes at the members of Appeal Resolution Body. The Appeal Resolution Body shall prepare written report for the process and voting that will be kept at the archive of the Council for SFM. This stage of dealing with appeal/complaint shall not be longer than 4 weeks”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 08 satisfies 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: Neither the stakeholders questionnaire nor interviews with stakeholders during the in-country visit indicate that a stakeholder submitted a complaint to the Council for SFM.</p>

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>The Statutes^[1], Articles 20 states that “Upon receiving an appeal, the Appeal Resolution Body informs the sender of the appeal that the appeal was received and responds to it within 60 days. In certain cases, this period can be extended for 30 days”.</p> <p>MK 08, page 2: “After receiving of decision, the President formally communicate the results from the process to the complainant, Assembly and other potentially concerned parties. This communication shall be done in a period of 7 days after receiving of decision from the Appeal Resolution Body”.</p> <p>Compliance: Conformity</p> <p>Justification: MK 08 satisfies 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.</p> <p>Compliance: Conformity</p>

	Justification: Neither the stakeholders questionnaire nor interviews with stakeholders during the in-country visit indicate that a stakeholder submitted a complaint to the Council for SFM.
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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>The Statutes^[1], Article 20 states that “the written request template and contact point are available on Council for SFM website”.</p> <p>MK 08, page 2: “The official contact point on communication for appeals/complaints is the official email address of the Council for SFM: pefcmk@gmail.com”.</p> <p>Compliance: Conformity</p> <p>Justification: MK 08 clearly defines the contact point for the receipt of complaints.</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>MK 02, chapter 5.1 includes a statement that “the identification of relevant stakeholders, including marginalized and key parties, should be done on basis of prior analysis and their recognition, which includes:</p> <ul style="list-style-type: none"> a) relevant sectors, b) key issues for each relevant sector, c) key stakeholders for each sector, d) marginalized stakeholders and the threats to their participation”. <p>Compliance: Conformity</p> <p>Justification: The document requires identification of stakeholders relevant to the standard setting.</p>
Process	<p>The applicant provided a “stakeholder mapping document”^[4] that includes identification of stakeholders in three main sectors (economic, environmental and social) and includes their description, and a manner of communication between the applicant and the relevant stakeholder.</p> <p>The stakeholders mapping only focuses on “key” and “marginalised” stakeholders (25) but includes relevant stakeholders that were known to the “initial working group”.</p> <p>The stakeholders mapping was carried out in May 2015 by the “initial working group”^[20] and then updated in 2016”^[4].</p> <p>Compliance: Conformity</p> <p>Justification: PEFC ST 1001 expects that the stakeholders mapping is carried out before the formal announcement of the start of the standard setting process and that it identified all or a vast majority of stakeholders relevant to the scope and objective of the standard setting. Although the stakeholder mapping document focuses on key and marginalised stakeholders, it is assumed that the identified stakeholders represent a significant part of the concerned interest in Macedonia.</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>MK 02, chapter 4.4: “The Council for SFM shall analyze constraints about participation of the key and marginalized stakeholders and shall develop actions to minimize the risk of non-participation”.</p> <p>MK 02, chapter 5.1 includes a statement that “the identification of relevant stakeholders, including marginalized and key parties, should be done on basis of prior analysis and their recognition, which includes:</p> <ul style="list-style-type: none"> a) relevant sectors, b) key issues for each relevant sector, c) key stakeholders for each sector, d) marginalized stakeholders and the threats to their participation. <p>Compliance: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
Process	<p>The applicant provided a “stakeholder mapping document” ^[4] that includes identification of “key” and “marginalised” stakeholders in three main sectors (economic, environmental and social) and includes their description, and a manner of communication between the applicant and the relevant stakeholder.</p> <p>For “marginalised” stakeholders (non-wood forest products pickers and seasonal workers) it includes constraints for their participation, mainly an informal and unorganised structure and ways of communication to resolve the constraint.</p> <p>For all stakeholders, the document describes means of communication, including public media, websites of partners’ organisations and direct communication.</p> <p>Compliance: Conformity</p> <p>Justification: The stakeholders mapping identifies key and marginalised (understood as “disadvantaged”) stakeholders, for marginalised it describes constraints for their participation and for all it describes means of communications that is understood as the main action to ensure their participation.</p>

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>MK 02, chapter 5.2.1 states that “the initiation of the documentation development process or its revision shall be announced on the Council for SFM website and other appropriate media in order to enable the stakeholders to actively contribute to the process. The announcement shall contain:</p> <ul style="list-style-type: none"> a) information on the goals, scope and steps in the standards setting process and framework, b) information on the opportunity for participation of the stakeholders in the process,

	<p>c) invitation to the stakeholders to nominate their representative in the WG,</p> <p>d) invitation for submitting comments on the scope and process of setting standards and</p> <p>e) link to the publicly available procedures for the standards setting process on the Council for SFM website.</p> <p>MK 02, chapter 5.2.2: “The period for receiving nominations for participation in the work group last for period of 4 weeks after the public announcement”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 requires to make public announcement in suitable media. The four weeks period for submitting nominations is satisfying the “timely manner” requirement.</p>
Process	<p>The application Checklist includes information that the announcement of the standard setting has been made through:</p> <ul style="list-style-type: none"> d) Publication in the daily newspaper DNEVNIK (23/5/2015) ^[2], e) Email communication (18, 21, 25 and 26 May 2015) ^[3], f) Announcement at the CNVP website. <p>Conclusion: Minor non-conformity</p> <p>Justification: The minor non-conformity has been assigned based on the following arguments:</p> <ul style="list-style-type: none"> - Announcement in the newspaper DNEVNIK^[2] (23/5/2015) and the e-mail communication^[3] was not done in a timely manner as the deadline for submitting nominations for the WG was set up at 1 June 2015; - The link to the CNVP website (provided in the Checklist) does not result in the announcement. The applicant argues that the link was lost during the reconstruction of the CNVP website.

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>MK 02, chapter 5.2.1 states that “the initiation of the documentation development process or its revision shall be announced on the Council for SFM website and other appropriate media in order to enable the stakeholders to actively contribute to the process. The announcement shall contain:</p> <p>a) information on the goals, scope and steps in the standards setting process and framework,</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
Process	<ul style="list-style-type: none"> - announcement in the DNEVNIK newspaper^[2] includes information about the objective of the process (development of SFM criteria and indicators, PEFC endorsement, certification of forests) and timetable to finish the process by the end of 2015; - the e-mail communication^[3] is in Macedonian only and cannot be verified. However, it includes as an attachment the announcement published in the DNEVNIK newspaper;

	<ul style="list-style-type: none"> - the link to the CNVP website is not accessible. <p>Compliance: Conformity</p> <p>Justification: Although the announcement in the DNEVNIK newspaper does not include description of the steps of the standard setting, it is sufficient for the stakeholders to understand its purpose and objectives and to make a decision on participation in the process.</p>
5.3 [The announcement and invitation shall include:] b) information about opportunities for stakeholders to participate in the process	
Procedures	<p>MK 02, chapter 5.2.1 states that “the initiation of the documentation development process or its revision shall be announced on the Council for SFM website and other appropriate media in order to enable the stakeholders to actively contribute to the process. The announcement shall contain:</p> <p>b) information on the opportunity for participation of the stakeholders in the process,</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 complies with the requirement.</p>
Process	<ul style="list-style-type: none"> - announcement in the DNEVNIK newspaper^[2] includes invitation of stakeholders to submit a nomination to the WG and comments of the standard setting process. - the e-mail communication^[3] is in Macedonian only and cannot be verified. However, it is expected that it includes invitation to participate in the WG and also includes as an attachment the announcement published in the DNEVNIK newspaper; - the link to the CNVP website is not accessible. <p>Compliance: Conformity</p> <p>Justification: The announcement in the DNEVNIK newspaper 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>MK 02, chapter 5.2.1 states that “the initiation of the documentation development process or its revision shall be announced on the Council for SFM website and other appropriate media in order to enable the stakeholders to actively contribute to the process. The announcement shall contain:</p> <p>c) invitation to the stakeholders to nominate their representative in the WG”.</p> <p>MK 02, chapter 5.2.1 states that “the WG should ensure that the format of the invitation to the marginalized and key stakeholders is understandable and delivered in a way which guarantees they have received it, for instance, registered post, a confirmation for received electronic mail, etc”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 complies with the requirement.</p> <p>Observation:</p> <p>The wording of MK 02 referring to the invitation of the key and marginalized stakeholders is not clear as the purpose of the announcement is to invite the stakeholders to form the WG and the WG cannot therefore ensure the format of the invitation.</p>

Process	<ul style="list-style-type: none"> - announcement in the DNEVNIK newspaper^[2] includes invitation of stakeholders to submit a nomination to the WG; - the e-mail communication^[3] is in Macedonian only and cannot be verified. However, it is expected that it includes invitation to participate in the WG and also includes as an attachment the announcement published in the DNEVNIK newspaper; - the link to the CNVP website is not accessible. <p>Compliance: Conformity</p> <p>Justification: The announcement in the DNEVNIK newspaper satisfies the requirement.</p>
5.3 [The announcement and invitation shall include:] d) an invitation to comment on the scope and the standard-setting process	
Procedures	<p>MK 02, chapter 5.2.1 states that “the initiation of the documentation development process or its revision shall be announced on the Council for SFM website and other appropriate media in order to enable the stakeholders to actively contribute to the process. The announcement shall contain:</p> <p>d) invitation for submitting comments on the scope and process of setting standards.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 complies with the requirements.</p>
Process	<ul style="list-style-type: none"> - announcement in the DNEVNIK newspaper^[2] includes invitation of stakeholders to submit comments on the standard setting process with a link to the CNVP website; it also includes email address pefcmk@gmail.com for the comments submission. - the e-mail communication^[3] is in Macedonian only and cannot be verified. However, it includes as an attachment the announcement published in the DNEVNIK newspaper; - the link to the CNVP website is not accessible <p>Compliance: Conformity</p> <p>Justification: The announcement in the DNEVNIK newspaper satisfies the requirement.</p>
5.3 [The announcement and invitation shall include:] e) reference to publicly available standard-setting procedures.	
Procedures	<p>MK 02, chapter 5.3.2 states that “the initiation of the documentation development process or its revision shall be announced on the Council for SFM website and other appropriate media in order to enable the stakeholders to actively contribute to the process. The announcement shall contain:</p> <p>e) link to the publicly available procedures for the standards setting process on the Council for SFM website”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
Process	<ul style="list-style-type: none"> - announcement in the DNEVNIK newspaper^[2] includes a link to the CNVP website with the standard setting procedures.

	<ul style="list-style-type: none"> - the e-mail communication^[3] is in Macedonian only and cannot be verified. However, it includes as an attachment the announcement published in the DNEVNIK newspaper; - the link to the CNVP website is not accessible <p>Compliance: Conformity</p> <p>Justification: The referenced CNVP website is not accessible and it cannot be directly verified if the standard setting procedures were publicly available at the time of the announcement. However, the conformity has been assigned based on indirect evidence of making reference to the website and the standard setting procedures in the DNEVNIK newspaper.</p>
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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>Review of the standard setting process:</p> <p>MK 02, chapter 5.2.1 states that “the Assembly shall publish the standards setting process on the website as well and the standard setting procedures document and shall review them according to the comments received”.</p> <p>Appointment of the Working Group</p> <p>The Statutes^[1], Article 13 states that the Assembly “appoint members of the commission for development and analysis of measures and indicators for sustainable forest management (working group)”.</p> <p>MK 02, chapter 5.2.2 states that “The nominations are gathered by the Assembly which is responsible for accepting or refusing the nominations of members in the WG. The acceptance or refusal of a nomination should be justified and match the balanced representation in the WG requirement as well as the available resources for the standards setting process. The Assembly shall inform the WG members for their acceptance”.</p> <p>Conclusion: Conformity</p> <p>Justification: Mk 02 satisfies the requirements for the review of the standard setting process as well as consideration of received nominations.</p>
Process	<p>Review of the standard setting process</p> <p>The applicant provided a statement^[5] that after the announcement of the standard setting process it has received no comments to the standard setting and its procedures.</p> <p>Conclusion: Conformity for the review of the standard setting process</p> <p>Justification: The applicant statement will be verified during the country’s visit and stakeholders consultation.</p> <p>Appointment of members of the Working Group</p> <p>The Checklist includes information that all nominations have been accepted. An explanation^[6] relating to establishment of the WG includes information that in January 2015 an initial WG consisting of 6 stakeholders was established by a signature of a Declaration^[7]. The initial WG was responsible for the start of the</p>

	<p>process and for creation of the formal standard setting WG (June 2015). The Council for SFM and its Assembly was then formally created in January 2016.</p> <p>Compliance: Conformity for consideration of nominations</p> <p>Justification: The nominations of interested organisations were considered and all accepted although this responsibility was carried out by the interim WG.</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>MK 02, chapter 5.3.1 requires that “working drafts during development or revision of a standard shall be available to all WG members”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
Process	<p>The WG worked from June 2015 until July 2016. During this period it had 5 meetings (4 in June 2016) and two electronic votes (March and July 2016).</p> <p>The explanation relating to the work of the WG^[8] includes information that “at the beginning the members of the work group have agreed that on each work session (meeting) the work on the Draft C&I will be executed directly on computer (electronically) and the changes will be recorded with track changes or different (red) colour of letters where changes have been made. The work group also agreed that the document (work) from every version will be saved as new version according to the date and to be sent on email to each member of the working group”.</p> <p>Email correspondence to WG members^[16] confirms that the working group members received an e-mail informing them about the next meeting and a draft documents with marked changes agreed at the last meeting.</p> <p>A list of participants for each meeting has been held^[17].</p> <p>Conclusion: Conformity</p> <p>Justification: The WG members had access to the draft documents.</p> <p>Observation: It should be noted that a majority of the WG work was done in June 2015 during four meetings organized during one month. Such an arrangement poses a question whether the opportunity for contribution was “meaningful”, i.e. whether the members of the WG were provided with sufficient time to familiarize with the draft documentation, consulting their constituency and preparing their comments.</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>MK 02, chapter 5.3.1 requires that “All WG members should have an opportunity to actively contribute to the development or revision of a standard and to submit comments and proposals for the working draft version”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
Process	The applicant provided an explanation for the work of the WG (see 5.5a)

	<p>No formal minutes have been held for individual meetings. Instead, the WG agreed to keep a list of participants and to distribute a draft standard with marked changes agreed at the last meeting.</p> <p>Email correspondence to WG members^[16] confirms that the working group members received an e-mail informing them about the next meeting and a draft documents with marked changes agreed at the last meeting.</p> <p>A list of participants for each meeting has been held^[17].</p> <p>Conclusion: Conformity</p> <p>Justification: Although formal minutes with comments raised and results of the discussion have not been held, the distribution of draft standards provides confidence that the views of the WG members were discussed and decided upon.</p> <p>Stakeholders interviews held during the in-country visit confirm that the WG members had enough opportunities to discuss the draft standard(s).</p>
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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>MK 02, chapter 5.3.1 requires that “All views and comments by the WC members should be submitted using the template presented in Annex 1. The comments and views of any member of the WG along with the initial proposal should be reviewed in an open and transparent manner. All proposed solutions and changes which refer to the working draft version need to be kept”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
Process	<p>The applicant provided an explanation for the work of the WG (see 5.5a)</p> <p>No formal minutes have been held for individual meetings. Instead, the WG agreed to keep a list of participants and to distribute a draft standard with marked changes agreed at the last meeting.</p> <p>Email correspondence to WG members^[16] confirms that the working group members received an e-mail informing them about the next meeting and a draft documents with marked changes agreed at the last meeting.</p> <p>A list of participants for each meeting has been held^[17].</p> <p>Conclusion: Conformity</p> <p>Justification: Although formal minutes with comments raised and results of the discussion have not been held, the distribution of draft standards provides a sufficient level of confidence that the views of the WG members were discussed and decided upon.</p> <p>Stakeholders interviews held during the in-country visit confirm that the WG members had enough opportunities to discuss the draft standard(s) and their views were considered in an open and transparent way.</p>

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>MK 02, chapter 5.4.2 states that “the Assembly should conduct the public consultation of the working draft version. The initiation and end of the public consultation should be published in an appropriate time period on the Council for SFM website and in other suitable medium”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
Process	<p>Public consultation was carried out between 27 April 2016 and 5 July 2016. The public consultation was communicated by:</p> <ul style="list-style-type: none"> - announcement at the Facebook^[9, 10]; and - direct mails distributed to stakeholders identified in the stakeholders mapping^[11]. <p>The Facebook community includes about 150 followers (1 June 2017). The mails were sent to 15 e-mail addresses.</p> <p>The announcement includes information that the consultation lasts 60 days.</p> <p>The official website (www.pefc.mk) includes the forest management standard (http://pefc.mk/images/Kil.pdf) and comment form. However, it does not include the announcement of the public consultation itself.</p> <p>Compliance: Minor non-conformity</p> <p>Justification: The minor non-conformity has been assigned based on an argument that the organisation’s website should always be considered as the “suitable media”. However, the announcement of the public consultation cannot be found there nor has the applicant submitted evidence of posting from a screen shot of the announcement”.</p> <p>Although the announcement does not include explicitly the start and the end of the public consultation, this can be deduced from the publication of the announcement (the start date) and 60 days period (the end date).</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>MK 02, chapter 5.4.2 states that “the invitation to the marginalized and key stakeholders should be prepared in an understandable format and it should be ensured that it is delivered to them, for instance, registered post or a confirmation for received e-mail”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
Process	<p>A direct mail with the announcement of public consultation^[11] was sent to 15 email addresses corresponding to stakeholders identified in the stakeholders mapping. The mail was not sent to those stakeholders that were members of the WG.</p> <p>Compliance: Conformity</p> <p>Justification: Direct communication was used for key and disadvantaged stakeholders.</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>MK 02, chapter 5.4.2 states that “the working draft version should be publicly accessible on the Council for SFM website”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
Process	<p>The announcement of the public consultation^[9] published at the Facebook^[10] and included in the direct mails^[11] provide a link to the draft SFM standard available from the applicant’s website (http://pefc.mk/images/Kil.pdf).</p> <p>Compliance: Conformity</p> <p>Justification: The draft standard was available at the applicant’s website and was referenced in the announcement.</p> <p>Observation: The draft SFM standard does not include any title, identification or version. Therefore, the authenticity of the document presented for the public consultation could be questioned.</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>MK 02, chapter 5.4.2 states that “The public consultation should last for at least 60 days”</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
Process	<p>The announcement of the public consultation^[9] published at the Facebook^[10] and included in the direct mails^[11] provide information that the public consultation will last 60 days.</p> <p>The “Scheme Description and Standard Setting” document includes information that the public consultation lasted from 27 April 2016 to 5 July 2016.</p>

	<p>Compliance: Conformity</p> <p>Justification: The consultation lasted more than 60 days.</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>MK 02, chapter 5.4.2 states that “the received comments along with the initial proposals should be reviewed in an open and transparent manner as described in part 5.3.2. All proposed solutions and changes which refer to the working draft version need to be kept. The records of received comments which are material in nature, along with the results of their resolution, should be publicly available on the Council for SFM website”.</p> <p>Compliance: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
Process	<p>MK 01 includes information that no comment was received during the public consultation.</p> <p>Compliance: Conformity</p> <p>Justification: The applicant’s claim was confirmed by the stakeholders interviews held during the in-country visit.</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>MK 02, chapter 5.4.2 states that “the records of received comments which are material in nature, along with the results of their resolution, should be publicly available on the Council for SFM website”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
Process	<p>The “Scheme Description and Standard Setting” document includes information that no comment was received during the public consultation.</p> <p>Compliance: Conformity</p> <p>Justification: The applicant’s claim was confirmed by the stakeholders interviews held during the in-country visit.</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>MK 02, chapter 5.4.3 states that “The Assembly shall organize pilot testing of the new standards application and the results of it should be reviewed by WG. In case the standard is reviewed, the experiences from its application are a replacement of the pilot testing”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
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	The note to the requirement 5.7 of PEFC ST 1001 states that the pilot testing is not necessary in case of the scheme revision where the results of the previous certifications can substitute the pilot testing.
Process	<p>The “Scheme Description and Standard Setting” document includes information that the applicant organised a workshop with the participation of experts and an FSC auditor of the Soil Association (FSC certification body)^[12], experts and members of the WG. The objective of the workshop was to evaluate the applicability of the draft standard. The workshop resulted in a number of proposals for changes to the SFM standard^[12].</p> <p>Conclusion: Minor non-conformity</p> <p>Justification: The purpose of the pilot testing is to evaluate a practical auditability and feasibility of a draft standard. In general, it is expected that the pilot testing of a certification SFM standard takes place at the forest management unit (or any other level that is the object of certification) and includes evaluation of the forest management unit against the proposed standard. Although the workshop as well as a desk exercise analysis prepared by the FSC auditors provide valuable information on the suitability and auditability of the draft standard, it does not fully substitute the on-site pilot testing.</p>

PEFC ST 1001, 5.8	
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.	
Procedures	<p>MK 02, chapter 5.3.2 states that “The WG decision to suggest publishing the working draft version for public consultation or publishing the final version for formal approval should be brought with a consensus”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 02 satisfies the requirement.</p>
Process	<p>The decision to submit the final draft standard for a formal approval was taken by the WG on 19/07/2016 in a postal ballot. All 13 members of the WG voted in favour of submitting the final draft standard for the formal approval without any comments^[14].</p> <p>Conclusion: Conformity</p> <p>Justification: The final draft standard was agreed by all WG members with consensus.</p> <p>Observation: The decisions of the WG should be properly recorded in minutes of the meetings and records on postal ballots. Such official records are missing.</p>

PEFC ST 1001, 5.8	
<p>5.8 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, 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>MK 02, chapter 5.3.2 states that “the WG decision to suggest publishing the working draft version for public consultation or publishing the final version for formal approval should be brought with a consensus.</p> <p>In order to reach consensus, the WG can employ the following:</p> <p>a) face to face meetings with voting by stating yes or no, raising hand;</p> <p>b) formal secret voting, etc.,</p> <p>c) voting by electronic mail when the members are asked to vote for or against in writing”.</p> <p>Compliance: Conformity</p> <p>Justification: The wording satisfies the requirement.</p>
Process	<p>Conclusion: Conformity</p> <p>Justification: The WG was using a vote by e-mail with no negative vote, opposition or comments.</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>MK 02, chapter 5.3.2 states that “in case of a negative vote which represents permanent and sustained opposition to any important part of the concerned interests and to substantial issues, the following mechanisms should be used:</p> <p>a) discussions and talks for the issue for which there is no agreement in the WG in order to reach a compromise,</p> <p>b) direct negotiations between concerned parties which objected and those who hold an opposing view in order to reach a compromise,</p> <p>c) process of disagreement resolution by mediation”.</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>MK 02, chapter 5.5.1 states that “The final version should be presented for formal approval, along with the report for standards development which provides evidence for compliance of the process with documented procedures” and lists elements to be included in the development report.</p> <p>Compliance: Conformity</p> <p>Justification: The wording satisfies the requirement.</p>
Process	<p>The development report has been developed as a part of MK 01 and has been published at the applicant’s website (www.pefc.mk). The document briefly describes the whole standard setting process, its stages and timetable.</p> <p>Compliance: Conformity</p> <p>Justification: MK 01 satisfies the 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>MK 02, chapter 5.3.1 states that “the WG decision to suggest publishing the working draft version for public consultation or publishing the final version for formal approval should be brought with a consensus”.</p> <p>MK 02, chapter 5.5.2 states that “the final draft version should be submitted for approval to the Assembly. The approval should be conducted according to the Statute of the Council for SFM.</p> <p>In case the final draft version does not receive enough votes for formal approval, the Assembly should decide to:</p> <p>a) return the documents in preparatory or development stage or</p> <p>b) cancel the procedure.”</p> <p>Compliance: Conformity</p> <p>Justification: The wording satisfies the requirement.</p>
Process	<p>The final draft (2nd) of the SFM standard was unanimously adopted by the Assembly of the Council for SFM on 2nd September 2016^[15].</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>MK 02, chapter 5.6 states that “Within 4 weeks from the formal approval of a developed standard, the WG should correct possible mistakes and disseminate the document to all members of the Council for SFM and ensure that it is publicly accessible on its website”</p> <p>Compliance: Conformity</p> <p>Justification: The procedures satisfy the requirement.</p>
Process	<p>The formally approved SFM standard has been published at the applicant’s website as MK 03 (www.pef.mk).</p> <p>Compliance: Conformity</p> <p>Justification: The standard was formally published at the website.</p> <p>Observation: The SFM standard has been formally adopted on 2 September 2016. Its publication at the applicant’s website was verified on 1 June 2017. However, it is not possible to verify whether or not the document was published within 4 weeks as stipulated by MK 02.</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>MK 02, chapter 6 states that “Standards should be revised in time periods not longer than 5 years. The standards revision procedures are explained in section 5”.</p> <p>Compliance: Conformity</p> <p>Justification: The procedures satisfy the requirement as it specifies the maximum 5 years period and the revision procedures are identical with those of developing a new standard (section 5).</p>
Process	Not applicable. The assessment concerns the first edition of the SFM standard.

PEFC ST 1001, 6.2	
6.2 The revision shall define the application date and transition date of the revised standards/normative documents.	
Process	<p>MK 02, chapter 6 states that “standards revision should define application date and transition date for revised standards”.</p> <p>Not applicable: The requirement for “process” only concerns the first edition of the SFM standard.</p>

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.	
Process	<p>MK 02, chapter 6 states that “standards revision should define application date and transition date for revised standards. This is required for accepting the revised standards, presenting changes, information exchange and training. The transition date should not exceed a period of one year except under certain exceptional circumstances when a longer period is needed for conducting the revision.”</p> <p>The requirement for “process” is not applicable as assessment concerns the first edition of the SFM standard.</p> <p>Observation: The wording of the procedures should differentiate between the two dates: application and transition. The purpose of the postponed “application date” is to ensure “endorsement of the revised standards/normative documents, introducing the changes, information dissemination and training”. This period should not exceed one year.</p>

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.

Process

MK 02, chapter 6 states that “standards revision should define application date and transition date for revised standards. This is required for accepting the revised standards, presenting changes, information exchange and training. The transition date should not exceed a period of one year except under certain exceptional circumstances when a longer period is needed for conducting the revision.”

The requirement for “process” is not applicable as assessment concerns the first edition of the SFM standard.

Observation: The wording of the procedures should differentiate between the two dates: application and transition. The purpose of the postponed “transition date” is to ensure transition in certification from the original to the revised standard. The one year period should count from the application date.

8.3 Requirements for group forest management certification

8.3.1 Introduction and summary

The Macedonian scheme allows group certification as a certification model that is suitable to the fragmented ownership of private forests in Macedonia.

The requirements for group certification are defined in MK 06 “*Group certification rules and procedures*”.

The group certification model is based on a group of forest owners (“the members”) that is managed and controlled by a “group leader”. MK 06 requires the group leader to establish a management system ensuring members’ compliance with the forest management standard. It defines specific requirements for a group leader central administration function and for management of the group that covers:

- Creation of the group organisation structure, rules and procedures;
- Communication with the certification body;
- Acceptance of group members, including signing of an Agreement,
- Collecting and analysing information from group members;
- Providing the group members with information and guidance;
- Carrying out an internal audit programme based on sampling;
- Reviewing the non-conformities, requesting corrective and preventive measures and monitoring their implementation;
- Management of documentation and
- Records keeping.

Participating forest owners shall:

- Commit themselves to comply with the SFM standard, legislation and other guidelines of the group leader;
- Provide full cooperation with and assistance to the group leader and
- Implement relevant corrective and preventive measures requested by the group leader.

The scheme documentation for the group certification complies with the PEC requirements (PEFC ST 1002) except the following minor non-conformities:

Minor non-conformities

- Consideration of non-conformities in case of multiple forest certifications (PEFC ST 1002, 4.1.2);
The document does not explicitly prohibit the “multiple” certification of a forest owner and as such it “allows” a situation where a forest owner is covered by more forest management certificates. At the same time, the document does not specify how non-conformities found in one forest management certification are considered in another forest management certification;
- Commitment of the group entity on behalf of the group organisation (PEFC ST 1002, 4.2.1b);

The document requires the group leader to establish a management system. However, it does not explicitly require the group leader to make a commitment on behalf of the whole group organisation to comply with the requirements of the certification scheme.

Observation (not causing non-conformity with PEFC requirements)

- The document defines an Agreement (5.4) between the group leader and a member. The chapter relating to the Agreement requires the member to comply with “other guidelines issued by the group leader”. However, this obligation is not then reflected in chapter 5.8 that defines requirements for group members.

8.3.2 Detailed assessment

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>MK 06, chapter 4 includes the following definition:</p> <p>“Group Organization: A group of members represented by the group leader for the purposes of implementation of the sustainable forest management standard and its certification. Members have signed a written agreement with the group leader for participation in the group certificate and are prepared to implement the sustainable forest management standard and other requirements according to the forest certification scheme”.</p> <p>Conclusion: Conformity</p> <p>Justification: The definition complies with PEFC ST 1002.</p>
b) the group entity,	<p>MK 06, chapter 4 includes the following definition:</p> <p>“Group leader: entity (legal party) which represents the group organization and is overall responsible for ensuring that forest management in the certified area is in compliance with the sustainable forest management standards and other requirements that need to be fulfilled according to the forest certification scheme”.</p> <p>Conclusion: Conformity</p> <p>Justification: The definition complies with PEFC ST 1002.</p>
c) the participant,	<p>MK 06, chapter 4 includes the following definition:</p> <p>“Member: forest owner / manager or other entity who is part of the group certificate, has legal right to manage the forest on a precisely specified area and is able to fulfil the requirements of the sustainable forest management standard”</p> <p>Conclusion: Conformity</p> <p>Justification: The definition is consistent with PEFC ST 1002.</p>
d) the certified area,	<p>MK 06, chapter 4 includes the following definition:</p> <p>“Certified area: the forest area covered by a group forest certificate representing the sum of forest areas of the members”.</p> <p>Conclusion: Conformity</p> <p>Justification: The definition is consistent with PEFC ST 1002.</p>

<p>e) the group forest certificate</p>	<p>MK 06, chapter 4 includes the following definition: “Group certificate: document which confirms that the group organization fulfills the requirements of the sustainable forest management standard as well as other requirements that need to be fulfilled according to the forest certification scheme” Conclusion: Conformity Justification: The definition is consistent with PEFC ST 1002.</p>
<p>f) the document confirming participation in group forest certification.</p>	<p>MK 06, chapter 4 includes the following definition: “Document confirming participation in group forest certification: A document issued to an individual member that refers to the group forest certificate and that confirms the member as being covered by the scope of the group forest certification”. Conclusion: Conformity Justification: The definition is consistent with PEFC ST 1002.</p>

PEFC ST 1002, 4.1.2	MK 06
<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>The document does not make reference to the multiple forest management certification of forest owners under more forest management certificates.</p>
<p>Conclusion: Minor non-conformity Justification: The document does not include requirements relating to the consideration of non-conformities in case of “multiple forest management certification” of forest owners covered by more forest management certificates. At the same time, the scope of MK 06 does not prohibit the “multiple” forest management certification and as such it has to be assumed that the scheme “allows” the “multiple” forest management certification.</p>	

PEFC ST 1002	MK 06
<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>Chapter 5.2, 5.3 and 5.4 provide requirements for the group leader that can be considered as “central administration”, including a “internal monitoring programme”. Chapter 5.2 states the “the group leader needs to prove that he is capable of collecting and analyzing data submitted or compiled by the group members and to prove his ability for initiating changes or improvements on group member level, if necessary”.</p>
<p>Conclusion: Conformity Justification: Chapter 5.2-5.4 ensure that the participants’ conformity is centrally administered.</p>	

Although MK 06 does not make an explicit reference to “review”, the quote from chapter 5.2 covers the objective of the term.

PEFC ST 1002	MK 06
<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>Chapter 5.7: “The group leader shall annually conduct an internal audit of the entire system of group certification. This shall include the fulfillment of requirements listed in this document as well as undertaking corrective and preventive measures. The group leader shall carry out an internal audit of the members for compliance with the SFM standard at least once a year. The audit of members shall be conducted on a sample not smaller than the square root of the number of the members in the group. The following shall be taken into consideration: the different sizes of the forest properties, their geographical distribution, management intensity, comments and remarks from previous audits, etc.” Chapter 5.2 requires qualification for a person conducting the internal audits as “a degree in forestry engineering (any direction) and minimum 2 years of relevant experience in the field”.</p>
<p>Conclusion: Conformity Justification: MK 06 requires annual internal audits of the “members”, defines the sampling methodology and qualification of personnel performing the audits.</p>	

PEFC ST 1002, 4.2.1	MK 06
<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 5.3: [The group leader] is responsible for: - “Contacting the forest certification body on the behalf of the members, applying for certification and signing agreements with it” - “Instantly informing the certification body and Council for SFM about issued, terminated or suspended sustainable forest management certificates”.</p> <p>Conclusion: Conformity</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 5.2: “the group leader shall demonstrate to have established a management system which is in compliance with requirements (5.3 - 5.10) and that members fulfill the requirements of PEFC MKD Forest Management Standard – PEFC MK 03:2016”.</p>

	<p>Conclusion: Minor non-conformity</p> <p>Justification: The “commitment” as a voluntary expression of intent to comply with the requirements in the future is not the same as “demonstrating” the compliance at a given point of time.</p>
c) To establish written procedures for the management of the group organisation;	<p>Chapter 5.3:</p> <p>[The group leader] is responsible for]:</p> <p>“Preparing written procedures for managing the group”</p> <p>Conclusion: Conformity</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 5.3:</p> <p>[The group leader] is responsible for]:</p> <p>Keeping records and documents for:</p> <ul style="list-style-type: none"> a) the fulfillment of SFM standard and other certification scheme requirements by the group leader and the members; b) all members, their contact details, data on their forest and size; c) the certified forest area; d) conducting internal audit, revision of the audit and the preventive and corrective measures taken”. <p>Conclusion: Conformity</p> <p>Justification: MK 06 satisfies the requirement.</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>Chapter 5.4:</p> <p>“Each member shall sign a written Agreement with the group leader which ensures that the SFM standard requirements are observed. The following conditions with reference to the Agreement should be met:</p> <ul style="list-style-type: none"> - The agreement shall be signed by the owner or an authorized representative <input type="checkbox"/> - The member shall be informed about the SFM standard requirements - The member shall be responsible for complying with the legislation, SFM standard and other guidelines issued by the group leader - The member shall accept inspections from a third party - The Agreement is valid for minimum one and maximum five years - The group leader has the right to propose and ask for corrective or preventive measures from the member - The group leader has the right to exclude any member for major deviations from the SFM standard - The group leader shall issue document confirming participation in group forest

	<p>certification when the member manages his forest in accordance with the SFM standard requirements</p> <ul style="list-style-type: none"> - The group leader shall regularly collect information regarding forest management from each member in regular intervals, minimum once a year” <p>Conclusion: Conformity</p> <p>Justification: MK 06 satisfies the requirement.</p>
f) To provide participants with a document confirming participation in the group forest certification;	<p>Chapter 5.4:</p> <p>“The group leader shall issue document confirming participation in group forest certification when the member manages his forest in accordance with the SFM standard requirements”</p> <p>Conclusion: Conformity</p> <p>Justification: MK 06 satisfies the requirement.</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>Chapter 5.3</p> <p>[The group leader] is responsible for:</p> <p>“Providing information, rules and guidelines for the members in the group organisation in order to help them fulfill the sustainable forest management standard requirements”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 06 satisfies the requirement.</p>
h) To operate an annual internal monitoring programme that provides for the evaluation of the participants’ conformity with the certification requirements, and;	<p>Chapter 5.7:</p> <p>“The group leader shall annually conduct an internal audit of the entire system of group certification. This shall include the fulfillment of requirements listed in this document as well as undertaking corrective and preventive measures.</p> <p>The group leader shall carry out an internal audit of the members for compliance with the SFM standard at least once a year. The audit of members shall be conducted on a sample not smaller than the square root of the number of members in the group. The following shall be taken into consideration: the different sizes of the forest properties, their geographical distribution, management intensity, comments and remarks from previous audits, etc.”</p> <p>Chapter 5.2 requires qualification for a person conducting the internal audits as “a degree in forestry engineering (any direction) and minimum 2 years of relevant experience in the field”.</p> <p>Conclusion: Conformity</p> <p>Justification: MK 06 satisfies the requirement. It requires the implementation of internal audits; defines the square root of members as a minimum audit intensity and defines qualification of personnel performing the audits.</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 and preventive measures if required; and the evaluation of the effectiveness of corrective actions taken.</p>	<p>Chapter 5.3</p> <p>[The group leader] is responsible for:</p> <p>Undertaking preventive and corrective measures for the noted deviations in the management of forests which are subject to group certification or the administrative functions of the group leader, after receiving the results from the external and internal audits. Subsequently, the efficiency of the preventive and corrective measures is evaluated.</p> <p>Annex 1 provides classification of non-conformities with the forest management standard identified during an internal or external audit and defines corrective actions to be applied:</p> <p>"If the deviation is pointed out after the SFM proof has been issued, the group leader shall give the member a written injunction about a corrective action with a deadline within 3 months. If the deviation has been observed repeatedly, the group leader shall suspend the SFM proof until the required corrective action has been executed.</p> <p>If the corrective action has not been executed or the deviation is directly inconsistent with the SFM Standard, conditions for withdrawal of the certification consent and agreement exist. The member receives written communication about the presence of the conditions for withdrawing the agreement for participating in the group. The owner of the forest is requested to explain the criticized circumstances within two months. If the explanation is considered unsatisfactory, the agreement for participation in the group is terminated".</p> <p>Conclusion: Conformity</p> <p>Justification: Chapter 5.3 and Annex 1 satisfies the requirement as they require direct requests for preventive and corrective measures.</p>
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PEFC ST 1002	MK 06
4.3.1 The forest certification scheme shall define the following requirements for the participants:	
<p>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>	<p>Chapter 5.4:</p> <p>"Each group member shall sign a written Agreement with the group leader which ensures that the SFM standard requirements are observed. The following conditions with reference to the Agreement should be met: ...The member shall be responsible for complying with the legislation, SFM standard and other guidelines issued by the group leader"</p> <p>Conclusion: Conformity</p>
<p>b) To comply with the sustainable forest</p>	<p>Chapter 5.4:</p>

<p>management standard and other applicable requirements of the forest certification scheme;</p>	<p>“Each member shall sign a written Agreement with the group leader which ensures that the SFM standard requirements are observed. The following conditions with reference to the Agreement should be met: ...The member shall be responsible for complying with the legislation, SFM standard and other guidelines issued by the group leader”.</p> <p>Chapter 5.8:</p> <p>“By signing the agreement with the group leader, the group member is accepting the following rules as a minimum:</p> <ul style="list-style-type: none"> - PEFC Macedonia’s Forest Management Standard. - Relevant legislation and regulation associated with forestry in Macedonia. <p>Conclusion: Conformity</p> <p>Observation: The Agreement (5.4) requires the member to comply with “other guidelines issued by the group leader”. However, this obligation is not then reflected in chapter 5.8 that defines requirements for group members.</p>
<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>	<p>Chapter 5.8:</p> <p>“By signing the agreement with the group leader, the member is accepting the following rules as a minimum:</p> <ul style="list-style-type: none"> - Responding effectively to all requests from the group leader or certification body for relevant data, documentation or other information whether in connection with formal audits, reviews or otherwise. - Providing full co-operation and assistance in respect of the satisfactory completion of internal audits, reviews, relevant routine enquiries or corrective actions”. <p>Conclusion: Conformity</p>
<p>d) To implement relevant corrective and preventive actions established by the group entity.</p>	<p>Chapter 5.8:</p> <p>“By signing the agreement with the group leader, the member is accepting the following rules as a minimum:</p> <p>Implementation of relevant corrective and preventive actions established by the group leader”.</p> <p>Conclusion: Conformity</p>

8.4 Requirements for forest management standard

8.4.1 Introduction and summary

Scope and content of the standard

Requirements for SFM of the Macedonian scheme are included in MK 03 “PEFC National Standard for Sustainable Forest Management” that includes mandatory requirements for forest owners/managers applying for forest certification at individual or group level.

MK 03 is based Pan-European criteria and indicators for sustainable forest management (SFM) approved by the Ministerial Conference for Protection of Forests in Europe in Lisbon, 1998 but is largely based on PEFC ST 1003.

The standard is compiled of 6 chapters that are identical with 6 Pan-European criteria for SFM as well as 6 criteria used by PEFC ST 1003. Furthermore, it contains 16 thematic areas, 33 criteria and 84 indicators.

Individual criteria are presented in tabular form and are described by:

- a) Criterion description that provides objective of the criterion and means to achieve the objectives.
- b) Reference to legislation that helps to link criteria requirement with relevant legal framework and rules that are in force in Republic of Macedonia and relates to the content of criteria;
- c) Indicators allowing evaluation of the performance and compliance with the criterion and
- d) Source of verification that is a listing of sources of information and evidences used in conformity evaluation.

Summary of the content of MK 03

No.	Chapter	Thematic area	No. of Criteria	No. of indicators
1.	Maintenance and appropriate enhancement of forest resources and their contribution to the global carbon cycle	Forest inventory and forest planning	2	5
		Maintenance of forest resources in quantity, quality and structure	2	8
2.	Maintenance of forest ecosystem's health and vitality	Monitoring of forest resources	1	2
		Measures for maintenance of health and vitality of forest ecosystems	2	3
		Restrictions	5	10
3.	Maintenance and support of forest productive functions (wood and non-wood forest products)	Forest products	1	6
		Forestry activities and forest infrastructure	2	5
4.	Maintenance, conservation and enhancement of biological diversity of forest ecosystems	Forests of high ecological significance	2	6
		Close-to-nature forestry practice	5	9
		Traditional management systems	1	4
5.	Maintenance and enhancement of forest protective functions (notably soil and water)	Forest protective functions	2	7
6.	Maintenance of socio-economic functions and conditions	Socio-economic functions of the forests	2	5
		Ownership and traditional rights	1	2
		Trainings, knowledge development	2	3
		Occupational health and safety	1	7
		Compliance with legislation	2	2

Compliance with PEFC ST 1003

MK 03 complies with PEFC ST 1003 except for **two minor non-conformities** relating to the forest conversion and to use of pesticides that are covered by WHO Type 1A and 1B classification.

Forest Conversion (PEFC ST 1003, 5.1.11)

MK 03 defines requirements that are restrictive for forest conversion, including conversion of forests to forest plantations. The requirements are nearly identical to PEFC ST 1003 but:

- the criteria for “justified” conversion are missing the scale element (PEFC ST 1003, 5.1.11b);
- the reference to legislation concerning the verification of the compliance with MK 03 is not fully consistent with the conditions for “justified circumstances” and makes those conditions void;
- the legislation provided by the applicant^[19] does not sufficiently address the PEFC requirements as
 - (i) it does not relate to the conversion of forests to forest plantations;
 - (ii) it does not include provisions relating to the scale of the conversion. The fee defined by the legislation is not high enough to regulate the size of the conversion and it only applies to 2 specific cases of allowed forest conversion (out of six).

Pesticides WHO

MK 03 prohibits the use of pesticides classified as WHO Type A and B. MK 03 also allows exemptions that are based on permissions issued by the PEFC Council. However, the PEFC Council does not have a mechanism for the approval of derogations from the prohibited pesticides.

The note to PEFC ST 1003, 5.2.9 also includes a text that “Any exception to the usage of WHO Type 1A and 1B shall be defined by a specific forest management standard”. This expects the standard to define any exception from the WHO 1A and 1B prohibition.

Observations (not causing non-conformities)

Specificity and detail of MK 03

PEFC ST 1003 has been written as a meta-standard. In principle, a meta-standard does not need to include detail and specificity that is required and expected from a certification standard. Its main purpose is to provide a framework for development and evaluation of national forest management standards that have been developed for specific forestry, natural, cultural and socio-economic conditions of a particular country or region. Therefore, it is expected that the national standards will be more detailed and specific than PEFC ST 1003 itself and would also cover topics that are specific for the particular country.

MK 03 is largely based on PEFC ST 1003. For a majority of Criteria description it is using identical text or very similar text that does not exceed the level of detail of PEFC ST 1003.

Although MK 03 is largely satisfying the “letter” of PEFC ST 1003, it is not satisfying the “spirit” of the PEFC documentation and relationship between the national standard and the PEFC international meta-standard, concerning its expected detail.

Mandatory nature and wording of MK 03

MK 03 is unsystemically using a number of verbs for its provisions, including “shall”, “must”, “can” but also descriptive verbs such as “is”. For a number of Criteria descriptions, the text is rather “informative” and “descriptive” with missing mandatory nature of “*somebody shall do something*”. This increases ambiguity of the standard and decreases its suitability for conformity assessment purposes.

In some cases, the text applies to a body that is not the object of forest certification, for example law enforcement bodies in Criterion 6.8.

8.4.2 Detailed assessment

PEFC ST 1003, 4.1a	MK 03
<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 document includes both management system (management planning, monitoring, documented procedures, training and competences of staff, etc.) as well as performance based requirements.</p> <p>All the requirements of the document are designed for a forest management unit level.</p>
<p>Conclusion: Conformity</p> <p>Justification: The document complies with the requirement.</p>	

PEFC ST 1003, 4.1b	MK 03
<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>In general, the wording of the document is clear and objective based on auditable requirements.</p> <p>In some cases, the document is lacking a detail required by the PEFC Council or the requirements are conflicting and this is reported for the specific PEFC requirement to which the issue relates.</p>
<p>Conclusion: Conformity</p> <p>Justification: The document satisfies the requirement.</p>	

PEFC ST 1003, 4.1c	MK 03
<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 1 states that “forest managers and forest owners are responsible to ensure full compliance to forest management standard including activities that are conducted by contracted forest operators in certified forest area”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 includes forest owners/managers’ responsibility for compliance in certified forest, including responsibility for contracted operators.</p>	

PEFC ST 1003, 4.1d	MK 03
<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	MK 03
<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>Criterion 1.3:</p> <p>“Forest management plans, plans for silviculture and protection or their equivalents are aimed towards maintaining of forests and forests lands as well towards improvement of economic, ecological, cultural and social values of the forests, including soil and water protection. The objectives should be achieved by use of appropriate means and are focused towards nature protection”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement although it does not provide any further detail.</p> <p>Observation: The second part of the requirement: “The objectives should be achieved by use of appropriate means”... is very general and ambiguous..</p>	

PEFC ST 1003, 5.1.2	MK 03
<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>Criterion 1.1</p> <p>“Forest management is based on permanent inventory cycles, planning, implementation, monitoring and analysis of the management taking in consideration economical, ecological and social influence of forest management with aim to avoid unnecessary negative impacts”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement.</p> <p>Observation: MK 03 is very general and does not exceed the level of detail of PEFC ST 1003.</p>	

PEFC ST 1003, 5.1.3	MK 03
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>Criterion 1.1</p> <p>“Forest inventory and mapping is conducted on appropriate way which reflects the structural elements of the stand, management measures and is in balance with law regulation”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 requires inventory and mapping.</p> <p>Observation: MK 03 is very general and does not exceed the level of detail of PEFC ST 1003. The words like “appropriate” makes the provision ambiguous and is not auditable.</p>	

PEFC ST 1003, 5.1.4	MK 03
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>Criterion 1.2</p> <p>“Management plans or their equivalents are elaborated based on the existing forest legislation, taking in consideration existing spatial plans, current land use and other relevant documentation for specific area and treating the forest resources in balance with their volume and value, the ownership structure as well the purpose and intensity of their utilization. (5.1.4, 5.1.5)”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement.</p> <p>Observation: MK 03 is very general and does not exceed the level of detail of PEFC ST 1003.</p>	

PEFC ST 1003, 5.1.5	MK 03
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>Criterion 1.2</p> <p>“Management plans or their equivalents are elaborated based on the existing forest legislation, taking in consideration existing spatial plans, current land use and other relevant documentation for specific area and treating the forest resources in balance with their volume and value, the ownership structure as well the purpose and intensity of their utilization”.</p> <p>Criterion 1.2. makes a reference to the legislation and related documents, including a Rulebook for the content of Forest Management Plans (FMP).</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 does not include requirements for the content of the forest management plan. However, the legislation referenced by MK 03 (Rulebook for the content of Forest Management</p>	

Plans) that was submitted for evaluation^[17] includes detailed description of the content of forest management plans, including its textual, tabular and mapping parts. The legislation requires the forest management plan to include all elements described by the PEFC requirement.

PEFC ST 1003, 5.1.6	MK 03
<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>Criterion 1.2 “A summary of the forest management plan, plan for silviculture and protection or their equivalent which contains information about the forest management measures and location where they will be applied shall be publicly available based on the stakeholders request. The forest user or forest owner in accordance with national legislation decides what confidential information or information related to sensitive characteristics of the natural resources will not be part of the summary”</p>
<p>Conclusion: Conformity Justification: MK 03 requires the summary of forest management plan to be public.</p>	

PEFC ST 1003, 5.1.7	MK 03
<p>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>	<p>Criterion 1.1 “Forest management is based on permanent inventory cycles, planning, implementation, monitoring and analysis of the management taking in consideration economical, ecological and social influence of forest management with aim to avoid unnecessary negative impacts. The results from the monitoring and analysis of the management are conducted for period of 10 years and are used in planning process for defining the goals of future management. Forest inventory and mapping is conducted on appropriate way which reflects the structural elements of the stand, management measures and is in balance with law regulation”.</p>
<p>Conclusion: Conformity Justification: MK 03 requires monitoring of forest resources to be carried out in 10 years intervals and to feed back into the planning process.</p>	

PEFC ST 1003, 5.1.8	MK 03
5.1.8 Responsibilities for sustainable forest management shall be clearly defined and assigned.	<p>Criterion 1.4</p> <p>“Responsibilities for sustainable forest management shall be clearly defined and assigned. (5.1.8)”.</p>
<p>Conclusion: Conformity</p> <p>Justification: The document complies with the requirement.</p> <p>Observation: MK 03 is very general and does not exceed the level of detail of PEFC ST 1003.</p>	

PEFC ST 1003, 5.1.9	MK 03
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>Criterion 1.4</p> <p>“Forest management techniques and practices in the medium and long term shall safeguard the quantity and quality of the forest resources to the level that is economically, ecologically and socially desirable. Maintenance of the balance of the forest resources is secured through conducting of adequate silviculture measures and application of techniques for work in forest that minimize direct or indirect damage to forest, soil and water resources”</p> <p>“Ratio between increment and allowable cut is in function for forest sustainability in quality and quantity and it is comprised in forest management plan, programme for management or in their equivalents”.</p> <p>“Allowable cut is not higher than 80% from the increment”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it requires balance between harvesting and increment and minimisation of damages to forest, soil and water.</p>	

PEFC ST 1003, 5.1.10	MK 03
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>Criterion 1.4</p> <p>“Forest management techniques and practices in the medium and long term shall safeguard the quantity and quality of the forest resources to the level that is economically, ecologically and socially desirable. Maintenance of the balance of the forest resources is secured through conducting of adequate silviculture measures and application of techniques for work in forest</p>

	<p>that minimize direct or indirect damage to forest, soil and water resources.”</p> <p>“Ratio between increment and allowable cut is in function for forest sustainability in quality and quantity and it is comprised in forest management plan, programme for management or in their equivalents”.</p> <p>“Allowable cut is not higher than 80% from the increment”.</p>
<p>Conclusion: Conformity</p> <p>Justification: The document does not explicitly refer to a “desirable growing stock”. However, the conformity with the PEFC requirement is based on the fact that the requirements included in the document relating to the sustainable level of harvest, appropriate regeneration and tending methods lead to the desirable growing stock.</p>	

PEFC ST 1003, 5.1.11	MK 03
<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> <ul style="list-style-type: none"> 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 b) entails a small proportion of forest type; and 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 d) makes a contribution to long-term conservation, economic, and social benefits. 	<p>Criterion 1.3</p> <p>“It is restricted to decrease the area of forest and forest land through conversion to other types of land use, including conversion of primary forests to forest plantation unless in justified circumstances where the conversion is in compliance with:</p> <ul style="list-style-type: none"> a) national legislation relevant for land use and is a result of government authorities planning including consultations with materially and directly affected people and organizations; b) does not have negative impact on the threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species and other protected areas; c) long-term increase of economic and social benefits; (5.1.11)”. <p>Criterion 1.3</p> <p>“There is no decrease in the areas under forest (except in cases in correlation with national regulation)”.</p> <p>The Forest Law to which MK 03 refers^[19] includes regulations relating to the conversion of forest to non-forest use (article 14 and 15). The legislation defines (i) cases where conversion can be approved; (ii) a process of obtaining authorisation for the conversion and (iii) fee for the conversion.</p> <p>The fee for the conversion is required for two cases that are defined by the legislation: (a) for the construction of objects of public interest</p>

	determined by law and (ii) for performing activities of public interest determined by law. The fee level equates to the afforestation costs of an area 10 times larger than the converted area.
<p>Conclusion: Minor non-conformity</p> <p>Justification: The minor non-conformity has been assigned based on the following arguments:</p> <ul style="list-style-type: none"> - the criteria for “justified” conversion are missing the scale element (PEFC ST 1003, 5.1.11b); - the reference to “correlation with national requirements” is not fully consistent with the conditions for “justified circumstances” and makes those conditions void; - the legislation provided by the applicant^[19] does not sufficiently address the PEFC requirements as <ul style="list-style-type: none"> (i) it does not relate to the conversion of forests to forest plantations; (ii) it does not include provisions relating to the scale of the conversion. The fee defined by the legislation is not high enough to regulate the size of the conversion and it only applies to 2 specific cases of allowed forest conversion (out of six). 	

PEFC ST 1003, 5.1.12	MK 03
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.	<p>Criterion 1.3</p> <p>“Increasing the forest areas through the conversion of abandoned agricultural and bare lands into forest land shall be always taken in consideration whenever it enrich economic, ecological and social and/or cultural values.”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement although it does not exceed the level of detail of PEFC ST 1003.</p>	

PEFC ST 1003, 5.2.1	MK 03
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>Criterion 2.2</p> <p>“Maintenance of health and vitality of forest ecosystems is of primary importance for forestry. In forest management plans, plans for silviculture and protection or their equivalents are defined measures for maintenance of health and vitality, minimizing the risk of forest degradation or appearance of damages, as well as measures for eventually revitalization of degraded forest ecosystems.”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement.</p> <p>Observation: MK 03 is very general and does not exceed the level of detail of PEFC ST 1003.</p>	

PEFC ST 1003, 5.2.2	MK 03
<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>Criterion 2.1 “Health and vitality of forest is followed by permanent monitoring on the key biotic and abiotic factors and their influence on forests. The monitoring is conducted by professional institutions on annual basis in accordance with the national legislation. Monitoring shall be conducted by forest managers and forest owners on annual basis. During the analysis of the monitoring results and defining the measures for maintaining the health and vitality of forest ecosystems, naturally and regular occurrence of forest fires, forest pests and other factors that disrupts the stability of forest ecosystems is taken in consideration. Recommendations from professional institutions drafted in the results from the monitoring shall be considered in the forest management plans and their equivalents.”</p>
<p>Conclusion: Conformity Justification: MK 03 makes reference to the monitoring of key biotic and abiotic factors by a “professional institutions” according to the legislation and also requires annual monitoring by forest owners/managers. The recommendations made by the professional institutions shall be considered in the forest management plan.</p>	

PEFC ST 1003, 5.2.3	MK 03
<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>Criterion 2.1 “During the analysis of the monitoring results and defining the measures for maintaining the health and vitality of forest ecosystems, naturally and regular occurrence of forest fires, forest pests and other factors that disrupts the stability of forest ecosystems is taken in consideration.”</p>
<p>Conclusion: Conformity Justification: MK 03 satisfies the requirement. Observation: MK 03 is very general and does not exceed the level of detail of PEFC ST 1003.</p>	

PEFC ST 1003, 5.2.4	MK 03
<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</p>	<p>Criterion 2.2 “In forest management plans, plans for silviculture and protection or their equivalents are defined measures for maintenance of health and vitality, minimizing the risk of forest</p>

policy instruments set up to support these activities.	degradation or appearance of damages, as well as measures for eventually revitalization of degraded forest ecosystems.”
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement. Concerning the use of “policy instruments”, MK 03 makes references to relevant forest legislation and other forest policy instruments for each criterion.</p> <p>Observation: MK 03 is very general and does not exceed the level of detail of PEFC ST 1003.</p>	

PEFC ST 1003, 5.2.5	MK 03
<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>Criterion 2.2</p> <p>“Forest management is based on natural processes and in determining the measures to maintain the health of forests primary is taken care for utilization of preventive biological measures in cases where it is feasible and economically justified. Maintaining the genetic, species and structural diversity contributes to maintenance of the health and vitality of forest ecosystems.”</p> <p>“In naturally originated forests adequate and like nature harvesting practices are applied (silviculture measures focusing on natural regeneration, selected cuts, long regeneration periods)”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement.</p> <p>Observation: MK 03 is very general and does not exceed the level of detail of PEFC ST 1003.</p>	

PEFC ST 1003, 5.2.6	MK 03
<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>Criterion 2.6</p> <p>“It is not allowed starting the fire in forest, resin tapping, peeling of the bark from the trees, collecting dry leaves, humus and other activities that weakens productive capacity or threaten the survival of the forest and its multiply functions”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement.</p>	

PEFC ST 1003, 5.2.7	MK 03
<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>Criterion 4.4 In selection of forest species for afforestation priority has to be given to native tree species of local provenance that are well adopted on the habitat conditions.”</p> <p>Criterion 3.2 “Forest silviculture and regeneration measures are conducted by use of adequate techniques and technologies, in time and manner that support maintenance of productive capabilities of the forest habitat by avoiding un-necessary damage towards remaining forest trees in the stand as well towards soil layer in the forest”.</p> <p>Criterion 3.2 – Indicators: “1. Selection of silviculture and regeneration measures for prevention of damage to remaining trees in the stand are in function of criterion request. 2. Utilization of adequate technology during the harvesting is preventing damages on remaining trees in the stand and is in function of criterion request. 3. Utilization of the skidding technique that minimize the damage on soil layer”. 4. Skidding is performed on network of skidding roads described in AEP”. “Tree damage is allowed up to 2% of the volume of the remaining standing trees in the cutting area”.</p> <p>Criterion 2.3 “Utilization of tools, mechanization and techniques during the harvesting operations, skidding and transport are taken in cautious way to avoid unnecessary damage to forest, soil and waterways, based on operational plans where are defined depending on the size of the forest property.”</p> <p>Criterion 2.4 “During forest harvesting, skidding and transport the risk of oil spillage is strictly avoided and indiscriminate disposal of waste on forest land. Non-organic waste is collected, temporary stored on designated locations for this purpose and later on disposed on locations designated for that purpose.”</p>
<p>Conclusion: Conformity</p>	

Justification: MK 03 satisfies the requirement as it includes requirements for tree species selection (criterion 4.4); minimisation of damages during forestry operations (criterion 2.3, 3.2) and restrictions on spillage of oil, disposal of waste and its collection.

PEFC ST 1003, 5.2.8	MK 03
<p>5.2.8 The use of pesticides shall be minimised and appropriate silvicultural alternatives and other biological measures preferred.</p>	<p>Criterion 2.7 “The use of pesticides in forest is minimized and used in cases when application of silvicultural and biological measures is not justified. The application of pesticides is recommended by an expert or relevant institution. (5.2.8)”</p>
<p>Conclusion: Conformity Justification: MK 03 satisfies the requirement.</p>	

PEFC ST 1003, 5.2.9	MK 03
<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>Criterion 2.7 “It is prohibited usage of pesticides WHO* Type 1A and 1B. In cases where no other viable alternatives are available, type 1A and 1B may be applied on request only with prior written approval by PEFC Council. ” “Source of verification: Approval from PEFC Council for use of type 1A and 1B pesticides”</p>
<p>Conclusion: Minor non-conformity Justification: The note to PEFC ST 1003, 5.2.9 also includes a text that “Any exception to the usage of WHO Type 1A and 1B shall be defined by a specific forest management standard”. This indicates that the standard would directly define any exception from the WHO 1A and 1B prohibition. MK 03 makes a reference to the permission issued by the PEFC Council. However, the PEFC Council does not have a mechanism for the approval of derogations from the prohibited pesticides.</p>	

PEFC ST 1003, 5.2.10	MK 03
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>Criterion 2.7</p> <p>“Usage of pesticides such as chlorinated hydrocarbons it is prohibited, as well as any pesticides prohibited with Stockholm Convention on Persistent Organic Pollutants”.</p>
<p>Conclusion: Conformity</p> <p>Justification: The note to PEFC ST 1003, 5.2.10 makes a reference to the Stockholm Convention on Persistent Organic Pollutants. Therefore, MK 03 satisfies the requirement by making the direct reference to the Convention.</p>	

PEFC ST 1003, 5.2.11	MK 03
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>Criterion 2.7</p> <p>“Usage of pesticides is conducted according to the instructions given by the producer and implemented only with proper equipment and persons specially skilled for this purpose.”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement.</p> <p>Observation: MK 03 is very general and does not exceed the level of detail of PEFC ST 1003.</p>	

PEFC ST 1003, 5.2.12	MK 03
5.2.12 Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment.	<p>Criterion 2.8</p> <p>“Usage of fertilizers in forest is avoided. The fertilizers can be applied only by recommendation of respective institution on controlled and prescribed manner, taking in consideration their influence on the environment”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement.</p>	

PEFC ST 1003, 5.3.1	MK 03
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>Criterion 3.1</p> <p>“Forest management practices supports capacities of forest resources for production of diversified timber and non-timber products and services.”</p> <p>“Maintenance of the forests resource capacities for production of timber and non-timber forest</p>

	<p>products and services is one of the main goals of forest management planning. (5.3.1)”</p> <p>“There is no decreasing of the forest area and forest qualitative structure.</p> <ul style="list-style-type: none"> - The wood waste after cutting thinner than 3cm remains at harvesting area with respect to the provisions for conduction of forest order. - Regular available cut is not higher than 80% of the annual increment of wood mass.”
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement.</p>	

PEFC ST 1003, 5.3.2	MK 03
<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>Criterion 3.1</p> <p>“Forest management planning shall provide economic goals of the forest management with observation on annual basis. The forest structure and its productive capacities are base for determining the economics goals in forest management plans or their equivalents, taking in consideration the current need for different forest products and services and the market flows.”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 does not explicitly require the “sound economic performance”. However, implicitly, the sound economic performance is achieved by determining the economic goals and their annual review.</p>	

PEFC ST 1003, 5.3.3	MK 03
<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>Criterion 3.1</p> <p>“Forest structure and its productive capacities are base for determining the economics goals in forest management plans or their equivalents, taking in consideration the current need for different forest products and services and the market flows.”</p> <p>“Forest management practices supports capacities of forest resources for production of diversified timber and non-timber products and services.”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement.</p>	

PEFC ST 1003, 5.3.4	MK 03
5.3.4 Forest management practices shall maintain and improve the forest resources and encourage a diversified output of goods and services over the long term.	<p>Criterion 3.1</p> <p>“Forest management practices supports capacities of forest resources for production of diversified timber and non-timber products and services.”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it stipulates importance of diversification of forest products, services and functions.</p>	

PEFC ST 1003, 5.3.5	MK 03
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>Criterion 3.2</p> <p>“Forest silviculture and regeneration measures are conducted by use of adequate techniques and technologies, in time and manner that support maintenance of productive capabilities of the forest habitat by avoiding un-necessary damage towards remaining forest trees in the stand as well towards soil layer in the forest.”</p> <p>Criterion 3.2 – Indicators:</p> <p>“1. Selection of silviculture and regeneration measures for prevention of damage to remaining trees in the stand are in function of criterion request.</p> <p>2. Utilization of adequate technology during the harvesting is preventing damages on remaining trees in the stand and is in function of criterion request.</p> <p>3. Utilization of the skidding technique that minimize the damage on soil layer.</p> <p>4. Skidding is performed on network of skidding roads described in AEP”.</p> <p>“Tree damage is allowed up to 2% of the volume of the remaining standing trees in the cutting area”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement. It includes a general description of the requirement with more details being included in the related indicators (1-4) and with a specific threshold for the damage of trees.</p>	

PEFC ST 1003, 5.3.6	MK 03
<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>Criterion 3.1</p> <p>“The level of utilization of the products (timber and non-timber) doesn’t not jeopardize their long-term sustainability, with due regard to nutrients off-take from the soil at the level of optimum utilization of the products.”</p> <p>“Commercial utilization of non-timber forest products is regulated and performed under monitoring and control and is in compliance with the regulations. (5.3.7)”</p> <p>“Ratio between increment and planned available cut (available quantity for utilization) of wood products is in function for fulfilment of the criterion request”.</p> <p>“Regular available cut is not higher than 80% of the annual increment of wood mass”.</p>
<p>Conclusion: conformity</p> <p>Justification: MK 03 requires a sustainable level of harvest for both timber and non-timber products. For timber products it includes a specific threshold relating to annual increment. For non-timber products it refers to legislation and issuance of licenses.</p>	

PEFC ST 1003, 5.3.7	MK 03
<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>Criterion 3.1</p> <p>“Commercial utilization of non-timber forest products is regulated and performed under monitoring and control and is in compliance with the regulations.”</p> <p>Indicators for 3.1:</p> <p>“1. List of product types (from wood, mushrooms, forest fruits, herbs, game, stone and other) considered in FMP and FSPP and their equivalents.</p> <p>(Notification: relevant for management activities according to plan (FMP, FSPP), program for management. Data for the game are part of the hunting management plan, developed for certain territory)”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it requires monitoring and control of commercial utilisation of non-timber forest products. Indicator refers to the list of product types, including hunting.</p> <p>Observation: Fishing is not explicitly covered by MK 03 as the fishing is not a part of the forest management and is regulated by a specific Macedonian legislation.</p>	

PEFC ST 1003, 5.3.8	MK 03
<p>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.</p>	<p>Criterion 3.3</p> <p>“Construction of forest infrastructure (roads for transport and skidding, bridges and other objects) is performed in accordance with FMPs and their equivalents. Natural field configuration is used for avoiding unnecessary decreasing of soil layer and its spilling in water resources. During the construction of forest infrastructure measures are applied that preserves the natural level and function of water resources. Maintenance of the infrastructure is adequate and according with conditions and needs, with minimal negative impact on environment. Maintenance and drainage of forest roads is conducted according to plans and in accordance with the category of forest road. Therefore, more importance is given in rare, sensitive and representative ecosystems or genetic reserve stands, and the pathways of migration of key or endangered animal species.”</p> <p>Indicator for 3.3: “</p> <p>“1. Plan for construction and maintenance of forest road and other infrastructure with focus on the possible influence on ecosystem and migration corridors”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement. Although it does not refer to the “efficient delivery of goods and services”, the objective of the road infrastructure is linked to FMPs. The indicator to the criterion requires a special plan for forest road infrastructure. MK 03 sufficiently deals with negative impacts of forest infrastructure.</p>	

PEFC ST 1003, 5.4.1	MK 03
<p>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>	<p>Criterion 4.1</p> <p>“Forest management goals should aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic level and, where is appropriate to reach diversity at landscape level.”</p> <p>Indicators for 4.1:</p> <p>“1. Forest categorization according to forest designation.</p> <p>2. Selection of silviculture and regeneration measures are in function to sustain biodiversity.</p> <p>3. Identified and mapped forests of high ecological values according to the criterion requests.</p>

	4. Identification according to the national and international referent lists.”
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as protection of biodiversity is a goal of forest management planning.</p>	

PEFC ST 1003, 5.4.2	MK 03
<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>Criterion 4.1</p> <p>“During forest management planning, inventory and mapping of forests, if ecologically important forest exists, areas will be identified, protected and/or conserved, containing significant concentration of:</p> <p>(a) protected, rare sensitive, virgin or representative forest ecosystems;</p> <p>(b) threatened or protected endemic species and habitats of threatened species, defined and recognized in referent lists;</p> <p>(c) endangered and protected genetic in situ resources, as well as to be taken into account</p> <p>(d) nationally significant, large landscape areas with natural distribution and abundance of naturally occurring species.”</p> <p>Indicators for 4.1:</p> <p>“3. Identified and mapped forests of high ecological values according to the criterion requests.</p> <p>4. Identification according to the national and international referent lists.” diversity shall be identified and management principles shall be stated”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it defines the same categories of “ecologically important biotopes” as PEFC ST 1003. Indicators to the criterion require identification and mapping of such resources and reference to the national and international reference lists.</p>	

PEFC ST 1003, 5.4.3	MK 03
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>Criterion 4.2</p> <p>“Protected and endangered species of forest plants, mushrooms and forest animals shall not be exploited for commercial purposes. Where is necessary, measures shall be taken for their protection, nursing and increase their population.”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 explicitly prohibits commercialisation of protected and endangered species with an exemption consistent with the PEFC requirement.</p> <p>Observation: MK 03 has the same level of detail as PEFC ST 1003.</p>	

PEFC ST 1003, 5.4.4	MK 03
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>Criterion 4.4</p> <p>“Forest management measures have a goal to ensure successful natural forest regeneration. If this is not possible, afforestation measures should lead into securing adequate quantity and quality of forest resources in accordance with habitat conditions.”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it states a preference for natural regeneration.</p> <p>Observation: MK 03 has the same level of detail as PEFC ST 1003.</p>	

PEFC ST 1003, 5.4.5	MK 03
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>Criterion 4.4</p> <p>“In selection of forest species for afforestation priority has to be given to native tree species of local provenance that are well adopted on the habitat conditions.”</p> <p>“Only provenances and varieties of introduced species may be used if their impact on the ecosystem and genetic integrity of native species is adequately estimated and there are not negative impacts.”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it states a preference for native species and provenances. It also restricts usage of introduced species.</p> <p>Observation: MK 03 has the same level of detail as PEFC ST 1003.</p>	

PEFC ST 1003, 5.4.6	MK 03
5.4.6 Afforestation and reforestation activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.	Criterion 4.4 “Afforestation and reforestation that contributes to improvement and restoration of ecological connectivity shall be promoted and implemented.”
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement.</p> <p>Observation: MK 03 has the same level of detail as PEFC ST 1003.</p>	

PEFC ST 1003, 5.4.7	MK 03
5.4.7 Genetically-modified trees shall not be used.	Criterion 4.4 “It is not allowed utilization of reproductive materials from genetically-modified tree species.”
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it explicitly prohibits the use of genetically modified tree species.</p>	

PEFC ST 1003, 5.4.8	MK 03
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.	Criterion 4.3 “In stands where established diversity exists according to species and aged structure, forest management measures are applied supporting their existence as well as in stands with recognized values in landscape diversity perspective. In forest stands where diversity of species and age structure is not established, silviculture measures for ensuring their promotion shall be established”.
<p>Conclusion: Conformity</p> <p>Justification: MK 03 requires to maintain diversity (species/ age structure) in stands where it already exists and in stands with recognised values from landscape perspectives. In other stands the diversity shall be promoted by silvicultural methods.</p>	

PEFC ST 1003, 5.4.9	MK 03
5.4.9 Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible.	Criterion 4.8 “Traditional way of management of coppice forest can be conducted on appropriate habitats and in cases where it is ecologically, socially and economically viable”

	Indicator to Criterion 4.8: “1. No increase of coppice forest stands area.”
<p>Conclusion: Conformity</p> <p>Justification: The conformity has been assigned although MK 03 restricts the use of coppicing practices rather than promoting them.</p> <p>Coppicing is a traditional management method in Macedonia that resulted in about 70% of forests in Macedonia are coppice or degraded forests. This situation is result of combination of climatic conditions (Sub Mediterranean climate conditions) and traditional practice of coppicing. Coppicing is practiced on large areas with large scale clearcuts (up to 100 hectares) with negative impacts on soil erosion, habitats of wild species, water retention and landscape values. Therefore, it is justifiable for the Macedonian scheme to restrict the use of coppicing where it adds values, including usage of clearcutting and its size.</p>	

PEFC ST 1003, 5.4.10	MK 03
<p>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.</p>	<p>Criterion 4.5</p> <p>“Forest silviculture and utilization activities must be conducted on a way that doesn’t cause lasting damage on ecosystems. Wherever is possible, practical measures shall be taken to improve or maintain biological diversity”.</p> <p>Indicator to Criterion 4.5: “1. Documented assessment for condition of the stand and ecosystem after conduction of forest activities.”</p> <p>Criteria 2.3 and 3.2 restrict damages of forest operation on trees, water and soil resources.</p> <p>Criterion 4.8 restricts the use of clearcuts.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement with a general provision in 4.5, post-harvesting assessment (4.5), minimisation on negative impacts on the environment (2.3 and 3.2) and clearcutting restrictions (4.8).</p>	

PEFC ST 1003, 5.4.11	MK 03
<p>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>	<p>Criterion 3.3</p> <p>“Construction of forest infrastructure (roads for transport and skidding, bridges and other objects) is performed in accordance with FMPs and their equivalents. Natural field configuration is used for avoiding unnecessary decreasing of soil layer and its spilling in water resources. During the construction of forest infrastructure measures are applied that preserves the natural level and function of water resources. Maintenance of the infrastructure is adequate and according with conditions and needs, with minimal negative impact on environment. Maintenance and drainage of forest roads is conducted according to plans and in</p>

	<p>accordance with the category of forest road. Therefore, more importance is given in rare, sensitive and representative ecosystems or genetic reserve stands, and the pathways of migration of key or endangered animal species.”</p> <p>Indicator for Criterion 3.3: “1. Plan for construction and maintenance of forest road and other infrastructure with focus on the possible influence on ecosystem and migration corridors”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it includes provision for minimisation of negative impacts on biodiversity, ecologically important biotopes and endangered/protected/key species. MK 03 also requires a special plan for construction and maintenance of forest roads..</p>	

PEFC ST 1003, 5.4.12	MK 03
<p>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>	<p>Criterion 4.6 Forest management measures should be oriented towards establishing balance between the pressure of animal populations toward regeneration, forest development and biodiversity protection.</p> <p>Indicator to 4.6: “Documentation for monitoring on the presence of game (animal) populations and their influence on forest ecosystem”.</p> <p>The Forest Law prohibits grazing of goats and livestock (Article 13) and provide exemptions that ensure balance between the grazing, forest growth and biodiversity (Article 52)^[19].</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 focuses on wild animal population (see the Indicator 1) and is not relevant to the pressure of domestic animals and grazing. The issue of goat and other livestock grazing is sufficiently restricted by the Forest Law.</p> <p>Observation: The level of detail of MK 03 does not exceed PEFC ST 1003.</p>	

PEFC ST 1003, 5.4.13	MK 03
<p>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 health and stability of forests and on surrounding ecosystems.</p>	<p>Criterion 4.7 “Standing and fallen dead trees, monumental trees, trees with holes, old trees and special rare tree species are left in quantity and composition necessary for preserving biodiversity, taking in consideration the potential effects for health and stability of the forest and neighboring ecosystems.”</p> <p>Indicator to 4.7 “1. Existence of written directions and their implementation for leaving</p>

	<p>monumental, old, dead and laying trees in forest”.</p> <p>“Minimum performance requirement for 4.7:</p> <ul style="list-style-type: none"> - Minimum 3 trees per hectare according to criterion description are left in the stand. - The wood waste after cutting thinner than 3 cm remains at harvesting area with respect to the provisions for conduction of forest order”.
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it includes a general provision for protection of required elements; .require written procedures and provides minimum thresholds.</p>	

PEFC ST 1003, 5.5.1	MK 03
<p>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>	<p>Criterion 5.1</p> <p>“Forest management planning shall aim to maintain and enhance protective forest functions, such as erosion protection; wind protection; protection of water resources; protection from harmful effect of water (floods, avalanches); and infrastructure protection. Forest of protective purposes are registered and mapped in Forest Management Plans or their equivalents. Silviculture and protection measures are adapted to their function.”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it requires to maintain and enhance forest protection functions.</p> <p>Observation: The level of detail of MK 03 does not exceed PEFC ST 1003.</p>	

PEFC ST 1003, 5.5.2	Appendix 1, Doc. 3
<p>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>	<p>Criterion 5.1</p> <p>“Forest management planning shall aim to maintain and enhance protective forest functions, such as erosion protection; wind protection; protection of water resources; protection from harmful effect of water (floods, avalanches); and infrastructure protection. Forest of protective purposes are registered and mapped in Forest Management Plans or their equivalents. Silviculture and protection measures are adapted to their function.”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it requires to maintain and enhance forest protection functions.</p>	

Observation: The level of detail of MK 03 does not exceed PEFC ST 1003.

PEFC ST 1003, 5.5.3	MK 03
<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>Criterion 5.2 “In forests exposed on risk from soil erosion selection and implementation of measures for forest protection and silviculture is appropriate with their purpose and is aimed at protecting of the soil”.</p> <p>Indicators to 5.2: “1. Selection of silviculture and regeneration measures for forest with protective purpose is in function for fulfilment of the criterion request. 2. Usage of adequate technology is in function for fulfilment of the criterion request. 3. Clear cutting is forbidden in forests with a protective function, except in cases for forest rehabilitation due to extraordinary phenomena (fire, calamities, etc.) 4. It is prohibited the use of invasive techniques or use of heavy machinery which rupture and damage the soil layer in forests that are at risk of soil erosion or forests are of protective function”.</p>
<p>Conclusion: Conformity Justification: MK 03 satisfies the requirement as it includes restrictions in areas with soil protection functions.</p>	

PEFC ST 1003, 5.5.4	MK 03
<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>Criterion 5.2 “In forest with water protection functions special attention is dedicated in implementation of forest practices in order to avoid damage effects on the water quality and quality. Inappropriate chemical and harmful substances which has negative impact on the water quality are avoided during forest utilization”.</p> <p>Indicators to 5.2: “1. Selection of silviculture and regeneration measures for forest with protective purpose is in function for fulfilment of the criterion request. 2. Usage of adequate technology is in function for fulfilment of the criterion request.</p>

	<p>3. Clear cutting is forbidden in forests with a protective function, except in cases for forest rehabilitation due to extraordinary phenomena (fire, calamities, etc.)</p> <p>4. It is prohibited the use of invasive techniques or use of heavy machinery which rupture and damage the soil layer in forests that are at risk of soil erosion or forests are of protective function”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it includes restrictions in areas with water protection functions.</p>	

PEFC ST 1003, 5.5.5	MK 03
<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>Criterion 3.3</p> <p>“Construction of forest infrastructure (roads for transport and skidding, bridges and other objects) is performed in accordance with FMPs and their equivalents. Natural field configuration is used for avoiding unnecessary decreasing of soil layer and its spilling in water resources. During the construction of forest infrastructure measures are applied that preserves the natural level and function of water resources. Maintenance of the infrastructure is adequate and according with conditions and needs, with minimal negative impact on environment. Maintenance and drainage of forest roads is conducted according to plans and in accordance with the category of forest road. Therefore, more importance is given in rare, sensitive and representative ecosystems or genetic reserve stands, and the pathways of migration of key or endangered animal species.”</p> <p>Indicator for 3.3: “</p> <p>“1. Plan for construction and maintenance of forest road and other infrastructure with focus on the possible influence on ecosystem and migration corridors”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it includes provisions for minimising impacts on soil and water resources, including maintenance of roads drainage systems. MK 03 also requires a special plan for construction and maintenance of forest roads.</p>	

PEFC ST 1003, 5.6.1	MK 03
<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</p>	<p>Criterion 61</p> <p>“Forest management maintains socio-economical forest functions, their contribution</p>

rural development, and especially consider new opportunities for employment in connection with the socio-economic functions of forests.	on rural development and employment possibilities, recreational and aesthetic values as well as their positive impact on human health”.
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement.</p> <p>Observation: The level of detail of MK 03 does not exceed PEFC ST 1003.</p>	

PEFC ST 1003, 5.6.2	MK 03
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 61</p> <p>“Forest management maintains socio-economical forest functions, their contribution on rural development and employment possibilities, recreational and aesthetic values as well as their positive impact on human health”.</p> <p>The Forest Law to which MK 03 includes provisions that allow local residents to harvest timber for their own purposes (Article 66)^[19].</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 respects the role of forests in rural development. It is not specific enough to ensure that the “long-term health and well-being of local communities”. However, this issue is addressed by the Forest Law and its provisions for local residents to cut timber for their own needs.</p>	

PEFC ST 1003, 5.6.3	MK 03
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>Criterion 6.3</p> <p>“Property rights and land tenure arrangements are clearly defined, documented and established for the relevant forest area. The legal, customary and traditional rights related to forest and forest land are recognized and respected in accordance with national regulations. The activities undertaken in forest management respects legal, customary and traditional rights.”</p> <p>Indicators for 6.3</p> <p>“1. Existence of property lists and established borders of cadaster parcels.</p> <p>2. Securing the right of rural inhabitants to harvest wood from state forests for their own needs”.</p>
<p>Conclusion: Conformity</p>	

Justification: MK 03 satisfies the requirement, it requires clear identification and demonstration of property rights and land tenure. MK 03 makes reference to a formal cadastre and provides local people with rights to use wood from the state forests for their own purpose.

PEFC ST 1003, 5.6.4	MK 03
<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>MK 03, criterion 6.3 “Property rights and land tenure arrangements are clearly defined, documented and established for the relevant forest area. The legal, customary and traditional rights related to forest and forest land are recognized and respected in accordance with national regulations. The activities undertaken in forest management respects legal, customary and traditional rights.”</p>
<p>Conclusion: Not applicable Justification: The PEFC requirement is not applicable as there are no indigenous people in Macedonia.</p>	

PEFC ST 1003, 5.6.5	MK 03
<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>Criterion 6.2 “Forest are natural good of public interest and all citizens has the right of free access in forests for enjoyment and recreation, on their own responsibility for their safety and with an obligation to respect legal provisions. The free entrance can be limited or prohibited in protected parts of the forests, in forest parts where the human safety is in danger, in period of year of existing threat of forest fires or performance of harvesting, silviculture and forest protection activities. For informing about restriction of free access to forests, all appropriate tools for information are used (local media, municipal info, web-site, info boards on the field)”.</p>
<p>Conclusion: Conformity Justification: MK 03 satisfies the requirement as it ensures free access to forests.</p>	

PEFC ST 1003, 5.6.6	MK 03
<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>Criterion 6.1 “Forest sites with recognized historical, cultural or spiritual values and forest areas that essential for satisfying basic needs of local communities are managed with due attention, precaution and respect towards significance of that area”.</p> <p>An indicator to 6.1 requires a list of such areas to be kept.</p>
<p>Conclusion: Conformity Justification: MK 03 satisfies the requirement. Observation: The level of detail of MK 03 does not exceed PEFC ST 1003.</p>	

PEFC ST 1003, 5.6.7	MK 03
<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>Criterion 6.1 “Forest management maintains socio-economical forest functions, their contribution on rural development and employment possibilities, community well-being, recreational and esthetic values as well as their positive impact on human health”.</p> <p>“Forest managers and forest owners shall analyse and provide actions to secure recreational and aesthetic values of the forests”</p>
<p>Conclusion: Conformity Justification: MK 03 recognises recreational and aesthetic functions of forests. Although it is not explicit on specific actions, it requires forest owners to analyse the current situation and define respective actions.</p>	

PEFC ST 1003, 5.6.8	MK 03
<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>Criterion 6.4 “Professional and technical staff employed in forestry, service providers and forest owners have access to information and possibility for training regarding sustainable forest management as a precondition to fulfill all requests related to forest planning and management prescribed by this standard”.</p> <p>Indicator to 6.4: “1. Availability of materials and organized trainings for employees and other persons engaged in forest operations for meeting the</p>

	requirements for conducting sustainable forest management”.
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement.</p> <p>Observation: The level of detail of MK 03 does not exceed PEFC ST 1003.</p>	

PEFC ST 1003, 5.6.9	MK 03
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>Criterion 6.5</p> <p>“Where it is relevant, the local knowledge and experience that is related to forests is implemented in order to improve sustainable management of forests”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement.</p> <p>Observation: The level of detail of MK 03 does not exceed PEFC ST 1003.</p>	

PEFC ST 1003, 5.6.10	MK 03
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>Criterion 6.1</p> <p>“Effective and continuous communication and consultation with local population and other stakeholders are basic tools for resolving potential complaints in regards to forest management. In cases of dispute forest managers/forest owners shall prescribe mechanism for resolving dispute in effective way”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement for “effective communication and consultation”. MK 03 considers communication and consultation as a mechanism for resolving “potential” conflicts (a preventive measure). MK 03 requires to establish a mechanism for dispute settlement.</p>	

PEFC ST 1003, 5.6.11	MK 03
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>Criterion 6.6</p> <p>“Forestry works are planned, organized and performed in a manner that identify all possible risks towards health and appearance of accidental events by implementing all reasonable measures for protection of the workers. The engaged workers are informed about the permanent risks and they are properly trained for performing their work in order to preserve their health.”</p>

	<p>Indicators to 6.6:</p> <ol style="list-style-type: none"> “1. Identification of all possible risks at work. 2. Certificates for conducted trainings for safety during working activities in forests. 3. Engagement of trained workers in execution of forest operations. 4. Mandatory wearing safety equipment, possession of first aid kit and respect of protocols for safety at work (Rulebook for occupational safety). 5. Secured means of communication in need of emergency. 6. Usage of proper technical means and other work equipment. 7. Records on frequency of job related injuries per years.”
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it requires to identify the risks and implement measures to minimise those.</p>	

PEFC ST 1003, 5.6.12	MK 03
<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>Criterion 6.6</p> <p>“Forestry works are planned, organized and performed in a manner that identify all possible risks towards health and appearance of accidental events by implementing all reasonable measures for protection of the workers. The engaged workers are informed about the permanent risks and they are properly trained for performing their work in order to preserve their health.”</p> <p>Indicators to 6.6:</p> <ol style="list-style-type: none"> “1. Identification of all possible risks at work. 2. Certificates for conducted trainings for safety during working activities in forests. 3. Engagement of trained workers in execution of forest operations. 4. Mandatory wearing safety equipment, possession of first aid kit and respect of protocols for safety at work (Rulebook for occupational safety). 5. Secured means of communication in need of emergency. 6. Usage of proper technical means and other work equipment.

	7. Records on frequency of job related injuries per years.”
<p>Conclusion: Conformity</p> <p>Justification: MK 03 satisfies the requirement as it requires training of engaged workers. Indicators then specify detailed measures for ensuring safe working conditions.</p>	

PEFC ST 1003, 5.6.13	MK 03
5.6.13 Forest management shall comply with fundamental ILO conventions.	<p>Criterion 6.6 lists the fundamental ILO Conventions ratified by the Republic of Macedonia.</p> <p>Macedonia has ratified all 8 fundamental ILO Conventions.</p>
<p>Conclusion: conformity</p> <p>Justification: MK 03 satisfies the requirement as Macedonia ratified all Fundamental ILO Conventions (http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:103555). It is expected that Macedonia has incorporated those Conventions into its legal system.</p>	

PEFC ST 1003, 5.6.14	MK 03
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.	<p>Criterion 6.5</p> <p>“Forest management is based inter-alia on the results of the scientific research. Forest users and forest owners on request of relevant institutions and organizations, in framework of their availability are contributing to research activities and collection of data”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 03 requires that forest owners contribute to the research of relevant institutions and organisations.</p> <p>Observation: The level of detail of MK 03 does not exceed PEFC ST 1003.</p>	

PEFC ST 1003, 5.7.1	MK 03
<p>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.</p>	<p>Criterion 6.7 “Forest management comply with applicable regulations in the field of forestry, trade, nature and environment conservation; ownership and land tenure rights; occupational health and safety; labor law and collective agreement (where is applicable), payment of fees, royalties and taxes”.</p>
<p>Conclusion: Conformity Justification: MK 03 satisfies the requirement. Observation: The level of detail of MK 03 does not exceed PEFC ST 1003.</p>	

PEFC ST 1003, 5.7.2	MK 03
<p>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.</p>	<p>Criterion 6.8 “Forest managers shall implement legal provisions for protection of the forests from illegal activities and with that to ensure the implementation of systemic protection of forest. Systematic protection is in accordance to national legislation and provides regular functioning of institutions and bodies responsible for carrying out such kind of activities. On annual basis, forest owners shall monitor, record, investigate and report cases of illegal acts at their forests to institutions responsible for systematic protection of forests from illegal activities”.</p>
<p>Conclusion: Conformity Justification: MK 03 refers to the “systemic forest protection” defined by the Macedonian legislation (Article 80 and 81)^[19]. The legislation defines two levels, one is a governmental “Forest Police” established and financed by the state administration. The second level establishes “forestry guardian service” operated and financed by the public forest enterprise. In addition, to this regulatory arrangement, forest owners are required to report illegal activities to the State administration.</p>	

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.

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 the 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 submitted as a part of the scheme documentation a document PEFC ST 2002 with the first page of the document including an explicit statement that the applicant has adopted the PEFC international chain of custody standard (PEFC ST 2002) without any modifications;
- PEFC ST 2002 is referenced in the notification procedures (MK 05, chapter “Normative References”). 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.
- The scheme description document (MK 01) includes PEFC ST 2002 amongst the documents of the Macedonian scheme (chapter “Contents”). It also references PEFC ST 2002 as the standard against which the chain of custody certification is carried out.

Conclusion

The argumentation above provides evidence that PEFC ST 2002 has been adopted as a part of the Macedonian scheme by the direct adoption of the document as well as by its proper referencing in the scheme description document (MK 01) and in the scheme’s notification procedures (MK 05).

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 8.5).

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 submitted as a part of the scheme documentation PEFC ST 2003 with a clear statement on a front page that the document was adopted without any modifications as a part of the Macedonian scheme;
- PEFC ST 2003 is referenced in the notification procedures (MK 05, chapter "Normative References"). 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)⁸.
- The scheme description document (MK 01) includes PEFC ST 2003 amongst the documents of the Macedonian scheme (chapter "Contents").
- MK 04 (Certification and Accreditation Requirements) includes a statement that the requirements for certification bodies are included in PEFC ST 2003. The document does not include scheme specific requirements for chain of custody certification bodies.

Conclusion

The argumentation above provides evidence that PEFC ST 2003 has been adopted as a part of the Macedonian scheme by the direct adoption of the document as well as by its proper referencing in the scheme description document (MK 01) and in the scheme's notification procedures (MK 05).

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

⁸ It should be noted that assessment of notification procedures against PEFC GD 1004 is not covered by the scope of this assessment.

Observation

MK 04 has been developed as a scheme document that defines requirements for certification bodies operating forest management certification (e.g. Scope). However, MK 04 includes a number of references relating to the chain of custody certification (Annex 1, chapter 1, 4.1, Annex 2, chapter 1, 6 and 7). This issue has not been reported as a nonconformity as those references (i) do not overrule application of PEFC ST 2003; (ii) do not contradict to PEFC ST 2003 and (iii) the scheme's notification procedures (MK 05) include proper references to PEFC ST 2003.

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 covered by MK 04 (Certification and Accreditation Procedures). The referenced document includes only requirements for certification bodies operating both the forest management and makes a reference to PEFC ST 2003 concerning the applicable requirements for certification bodies operating the chain of custody certification.

Structure of the requirements (MK 04)

MK 04 includes requirements for certification bodies in its main body and two appendices:

- a) Annex 1: The qualification criteria for external auditors and certification bodies, and certification procedures;
- b) Annex 2: Guidelines for Certification Bodies and Auditors to conduct Forest Management certification

All three parts of the document include requirements for certification bodies, auditing and auditors. The text included in those three parts is highly redundant and in some cases also inconsistent.

The requirements for certification bodies is written in a very general way and in most cases describe elements that are already covered by ISO 17021 or ISO 19011 and does not exceed the level of detail of those ISO standards.

Certification and accreditation framework

MK 04 makes reference to ISO 17021 (respectively ISO 17021:2011), although it makes references to “the latest version” of the document.

MK 04 makes reference to accreditation that is issued by the Macedonian national accreditation body or another accreditation body that is a member of EA and/or IAF and makes statements relating to “accredited” certification and “presence of the accreditation symbol (or accreditation body’s name/accreditation number) on the certificate.

Assessment conclusion

The scheme’s requirements for forest management certification bodies, their accreditation and notification **comply** with Annex 6 of the PEFC Technical Document, except one **minor non-conformity**:

- Neither MK 04 nor MK 05 (Notification procedures) requires the certification body to carry out controls of the PEFC Logo usage where the certified entity uses the PEFC Logo.

Observations

- a) MK 04 includes several chapters and parts that are overlapping (main part, Annex 1, Annex 2). This inappropriate structure of the document results in a high level of redundancy and a number of inconsistencies and conflicting statements.
- b) The title of Annex 1 makes a reference to the qualification criteria for “external auditors and certification bodies”. This is highly confusing as the text of Annex 1 makes reference to auditors in general. It is also not clear what “external” certification body is as the term certification body is always used for the purposes of third party evaluation.
- c) The title of Annex 2 makes a reference to “Guidelines” although its scope makes a claim that it includes “minimum requirements”. The term Guidelines is in general understood as not being mandatory.
- d) The reference to ISO 17021 is confusing. Chapter 4.3 states that the certification body “shall fulfil the requirements of ISO/IEC 17021:2011 1:2015” is confusing and most probably includes an error resulting from the document’s last revision. It is also not clear whether the document makes a reference to ISO 17021:2011 or ISO 17021-1:2015.
- e) Most of the content of MK 04 and its Annexes describes elements that are already covered by ISO 17021 and/or ISO 19011 to which the certification body shall comply. The detail of MK 04 does not exceed the level of detail of ISO 17021.
- f) Although the document refers to ISO 17021 (management system certification) and requires the certification body to comply with this document, it also makes references to requirements for product certification. MK 04, Annex 1, chapter 4.2 states that “The qualification criteria for the certification bodies used in certification audits are based on general criteria for certification bodies operating quality and environmental system certification and/or product certification the certification body with requirements for certification bodies operating management system certification **and/or** product certification”.
- g) MK 04 is lacking elements that are specific for forest management certification and that are not covered by the referenced ISO standards (ISO 17021/ISO 17065) such as qualification of auditors and other certification body’s personnel; scope and content of the forest management audit. The requirements for qualification of auditors is described in a very general terms such as “good knowledge”, “general knowledge on forest management”, etc.
- h) MK 04 does not include any detail concerning the on-site evaluation of forest management that should be considered as the key element to be defined by the scheme specific document.
- i) MK 04 does not provide any requirements for sampling in case of group certification. It is not evident what procedures the certification body would use in sampling participating forest owners and what level of confidence would this certification deliver.
- j) MK 04, Annex 2 assigns the appeal and complaints resolution role to the applicant (the Council for SFM). It is not clear based on what instruments, the organisation will be able to implement or enforce any results of the dispute settlement process. The only link between the certification body and the Council for SFM is the notification arrangement and this does not allow the Council for SFM to interfere with the certification body’s operation. This issue is especially important as ISO 17021

includes specific requirements for certification bodies to establish and implement its own procedures for complaints and appeals.

8.6.2.2 Detailed assessment

Annex 6 of the PEFC TD	MK 04
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?	Section 1 “The certification procedure is conducted by an independent and impartial body which has taken no participation whatsoever in the process of establishing standards, certification or accreditation procedures.”
<p>Conclusion: Conformity</p> <p>Justification: MK 04 satisfies the requirement.</p> <p>Observation: It should be noted that the PEFC requirement does not prohibit a certification body to participate in the standard setting process and in many cases such a participation is valuable as it provides experience on implementation and auditability of the standard under development. However, the PEFC requirement does not allow the certification body to be a governing body of the standard setting process.</p>	

Annex 6 of the PEFC TD	MK 04
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 4.3: “Sustainable forest management certification, including group certification Certifying bodies conducting requirement conformity assessment for sustainable forest management (SFM) and group certification shall fulfil the requirements of ISO/IEC 17021:2011 1:2015, “Conformity assessment – Requirements for bodies providing audit and certification of management systems” supplemented by the specific requirements of the SFM Council for the needed sector expertise.”</p> <p>Chapter 4.3: “The certification body shall:</p> <ol style="list-style-type: none"> 1. Fulfill the general requirements for certification bodies defined in the standard ISO/IEC 17021:2011...”
<p>Conclusion: Conformity</p> <p>Justification: MK 04 requires certification body’s compliance with ISO 17021.</p> <p>Observation: The text of chapter 4.3 “shall fulfil the requirements of ISO/IEC 17021:2011 1:2015” is confusing and most probably includes an error resulting from the document’s last revision.</p>	

Annex 6 of the PEFC TD	MK 04
Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its	Chapter 4.3: “the certification body shall: <ol style="list-style-type: none"> 3. Understand the Macedonian system for sustainable forest management

<p>economic, social and environmental impacts, and on the forest certification criteria?</p>	<p>4. Possess competency for forest management and its economic, social and environmental influence.</p> <p>Annex 1 to MK 04, chapter 3.1 states that: “The auditors must: ... 4. Have a good knowledge on forest management sector, practice and legislation in Republic of Macedonia and its environmental, social and economic impacts.</p> <p>Professional expertise in forest management and its environmental impacts is proved on the basis of appropriate education and/or professional experience”.</p> <p>Annex 1 to MK 04, chapter 4.2 states that: [Certification body] must: “Have general knowledge on forest management and its environmental impacts. Professional expertise in forest management and its environmental impacts is proved on the basis of appropriate education and/or professional experience of the staff.”</p> <p>Annex 2 to MK 04, chapter 5.2.2: “When auditing forest management, the audit team must include at least one auditor qualified in forest management. Technical experts may complement the forest management and environmental competence of the auditors.”</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 04 satisfies the requirement although its wording is very general and ambiguous.</p> <p>Observation: Requirements relating to the competencies and experience of the certification body and its auditors (personnel) are written in very general way and is inconsistent between the main body of the document and its Annexes:</p> <ul style="list-style-type: none"> - The terms such as “good knowledge” or “competencies for forest management on forest management sector...and its and its environmental, social and economic impacts” are very general statements that are ambiguous for the evaluation of the certification body’s personnel competency, knowledge and experience; - Annex 1 (4.2) only refers to “general knowledge on forest management and its environmental impacts. Economic and social aspects are not covered. In addition, the term “general knowledge” is not consistent with the “good knowledge” of chapter 3.1; and - Annex 2 (5.2.2) requires an “auditor qualified in forest management”. This is not consistent with other referenced parts of the document. 	

Annex 6 of the PEFC TD	MK 04
<p>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?</p>	<p>Chapter 4.3: “the certification body shall: “Understand the Macedonian system for sustainable forest management”.</p> <p>Annex 1, 3.1: [Auditors must] “Have a good knowledge on the Macedonian Certification System with regard to forest management”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 04 satisfies the requirement.</p> <p>Observation: It should be noted that the requirements in MK 04 are duplicated and their meaning is not consistent. “Understanding” of a certification system does not need to be the same as “good knowledge” of the system.</p>	

Annex 6 of the PEFC TD, 3.2	MK 04
<p>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?</p>	<p>Annex 1, chapter 4.1:</p> <p>“The qualification criteria for auditors used in certification audits are based on the general auditing guidelines for quality and/or environmental management systems, or the general criteria for certification bodies operating management system certification, and complemented with sectoral expertise.</p> <p>The auditors must:</p> <ol style="list-style-type: none"> 1. Fulfil general criteria for quality and environmental management systems as defined in ISO 19011. 2. Fulfil general criteria for certification bodies operating management system certification. 3. Have a good knowledge on the Macedonian Certification System with regard to forest management. 4. Have a good knowledge on forest management sector, practice and legislation in Republic of Macedonia and its environmental, social and economic impacts. <p>Professional expertise in forest management and its environmental impacts is proved on the basis of appropriate education and/or professional experience.”</p>
<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>	

Observation: The qualification of auditors is described in very general and technical imprecise terms:

- a) It is not clear how an auditor can meet requirements for a management system (bullet point 1). Should this mean auditing of a management system?
- b) It is not clear how an auditor can meet requirements for certification bodies (bullet point 2). Should this mean requirements relating to the competence of the certification body's personnel and for evaluation?
- c) The term "general knowledge" is ambiguous and is not measurable.

Annex 6 of the PEFC TD, 3.2	MK 04
<p>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>	<p>Annex 1, chapter 4.1: "The qualification criteria for auditors used in certification audits are based on the general auditing guidelines for quality and/or environmental management systems, or the general criteria for certification bodies operating product certification, and complemented with sectoral expertise. The auditors must: 1. Fulfil general criteria for quality and environmental management systems as defined in ISO 19011".</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 04 makes reference to ISO 19011 (2011).</p> <p>Observation: The qualification of auditors is described in very general and technical unprecise terms as it is not clear how an auditor can meet requirements for a management system (bullet point 1). Should this mean auditing of a management system?</p>	

Annex 6 of the PEFC TD, 3.2	MK 04
<p>Does the scheme documentation include additional qualification requirements for auditors carrying out forest management audits?</p>	<p>MK 04 is very general and does not define scheme specific qualification requirements for auditors.</p>
<p>Conclusion: Not mandatory requirement</p>	

Annex 6 of the PEFC TD, 3.2	MK 04
Does the scheme documentation require that certification bodies shall have established internal procedures for forest management certification?	MK 04, Annex 1, chapter 4.2: “The certification body must: 1. Fulfil the criteria for certification bodies defined in latest version of ISO 17021. 2. Use a documented method, according to which forest management may be audited and certified”.
<p>Conclusion: Conformity</p> <p>Justification: MK 04 requires the certification body to use “a documented method”. This implies that the certification shall have procedures for its processes.</p>	

Annex 6 of the PEFC TD, 4	MK 02
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?	MK 04, Annex 1, chapter 4.2: “The qualification criteria for the certification bodies used in certification audits are based on general criteria for certification bodies operating quality and environmental system certification and/or product certification” “The certification body must: 1. Fulfil the criteria for certification bodies defined in latest version of ISO 17021”.
<p>Conclusion: Conformity</p> <p>Justification: MK 01 satisfies the requirement.</p> <p>Observation: Chapter 4.2 makes the certification body to comply with requirements for certification bodies operating management system certification and/or product certification. This option of product certification requirements is not consistent with the following reference to ISO 17021.</p>	

Annex 6 of the PEFC TD, 4	MK 04
<p>Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?</p>	<p>The Certification body shall have documented procedures for determining audit time, the time needed to plan and accomplish complete and effective audit of the clients operation. The procedures applied are based on the ISO 19011:2011, "Guidelines for auditing management systems".</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 04 makes reference to ISO 1901:2011.</p> <p>In addition, it should be noted that the latest edition of ISO 17021:2011 has incorporated important elements of ISO 19011:2002 and thus a sole reference to ISO 17021 would satisfy the purpose of the PEFC requirement of Annex 6.</p>	

Annex 6 of the PEFC TD, 4	MK 04, MK 05
<p>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?</p>	<p>MK 04, Chapter 5 requires that "The certification body shall provide the SFM Council with information for all certificates issued according to the Macedonian system..."</p> <p>MK 04, Chapter 5 then specifies what information shall be transferred to the "SFM Council".</p> <p>MK 05, chapter 6.1 requires that [the certification body shall] "provide The Council for SFM immediately and truthfully with a completed reporting form for each PEFC Forest Management certificate and every site covered by a group certificate, issued within the scope of PEFC Council notification and on changes concerning reported certificates".</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 04 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	MK 04, MK 05
<p>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?</p>	<p>Neither MK 04 nor MK 05 includes a requirement relating to the certification body's obligation to control the use of the PEFC Logo.</p>
<p>Conclusion: Minor non-conformity</p> <p>Justification: Neither MK 04 nor MK 05 includes a requirement relating to the certification body's obligation to control the use of the PEFC Logo.</p>	

Annex 6 of the PEFC TD, 4	MK 04
Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 2, chapter 5.3.3 states that “Surveillance audits are carried out at least once a year during the validity of the certificate, provided that the interval between the audits does not exceed one year”.
<p>Conclusion: Conformity Justification: MK 04 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	MK 04
Does a maximum period for assessment audit not exceed five years for forest management certifications?	Annex 2, chapter 5.3.5 states that “the certificate is valid for a maximum of five years”.
<p>Conclusion: Conformity Justification: MK 04 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	MK 04
Does the scheme documentation include requirements for public availability of certification report summaries?	<p>Chapter 4.5.4 states that “Final summary of the entire report which will be open to the public and provided by the certification body”.</p> <p>Annex 2, chapter 5.2.1 states that “A summary of the certification report, including a summary of findings on the auditee’s conformity with the PEFC national forest management standard for Macedonia, written by the certification body, shall be made available to the public by the Macedonian Forest Certification Council”.</p>
<p>Conclusion: Conformity Justification: MK 04 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	MK 04
Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 2, chapter 5.2.1 states that “the audit evidence to determine the conformity with the PEFC national forest management standard shall include relevant information from external parties (e.g. government agencies, community groups, conservation organizations, etc.) as appropriate”.
<p>Conclusion: Conformity</p> <p>Justification: MK 04 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	MK 04
Does the scheme documentation include additional requirements for certification procedures?	MK 04 includes additional requirements for certification process.
<p>Conclusion: Not mandatory requirement</p>	

Annex 6 of the PEFC TD, 5	MK 04
Does the scheme documentation require that certification bodies carrying out forest management certification shall be accredited by a national accreditation body?	<p>Chapter 1 states that “the bodies conducting sustainable forest management certification in accordance with the SFM Council requirements, including the group certification shall be accredited. The accreditation shall be obtained from The Institute for Accreditation of the Republic of Macedonia or another accreditation body that is a member of the International Accreditation Forum (IAF) and/or European co-operation for Accreditation (EA)”.</p> <p>Annex 1, chapter 4.1 states that “Certification bodies carrying out forest management certification shall be accredited by a national or another international accreditation body.</p> <p>The accreditation shall be issued by an accreditation body which is a part of the European cooperation for Accreditation (EA) and/or the International Accreditation Forum (IAF) umbrella and which implement procedures described in ISO 17011 and other documents recognized by the above mentioned organizations”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 04 satisfies the requirement.</p> <p>Observation: MK 04 includes duplicated requirements for accreditation. However, those are not fully consistent. Chapter 1 makes the reference to the Macedonian accreditation but Annex 1</p>	

makes only reference to members of EA and IAF. Annex 1 makes the reference to an “international” accreditation body while EA nor IAF only represent national accreditation bodies.

Annex 6 of the PEFC TD, 5	MK 04
Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Chapter 4.6 states that “The certificate shall contain at least the following information: ...Name of accreditation body and number of accreditation of the certification body.
<p>Conclusion: Conformity</p> <p>Justification: MK 04 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 5	MK 04
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>Ch Chapter 1 states that “the bodies conducting sustainable forest management certification in accordance with the SFM Council requirements, including the group certification shall be accredited. The accreditation shall be obtained from The Institute for Accreditation of the Republic of Macedonia or another accreditation body that is a member of the International Accreditation Forum (IAF) and/or European co-operation for Accreditation (EA)”.</p> <p>Annex 1, chapter 4.1 states that “Certification bodies carrying out forest management certification shall be accredited by a national or another international accreditation body.</p> <p>The accreditation shall be issued by an accreditation body which is a part of the European cooperation for Accreditation (EA) and/or the International Accreditation Forum (IAF) umbrella and which implement procedures described in ISO 17011 and other documents recognized by the above mentioned organizations”.</p>
<p>Conclusion: Conformity</p> <p>Justification: MK 04 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 5	MK 04
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?	Annex 1, chapter 4.2 states that “The certification body must ...undertake forest management certification as “accredited certification” based on latest version of ISO 17021 and have the relevant forest management standard(s) covered by the accreditation scope”.
<p>Conclusion: Conformity</p> <p>Justification: MK 04 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 5	MK 04, MK 05
Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	MK 04, chapter 4.2 and MK 04, Annex 1(MK 05 includes requirements for notification of certification bodies.
<p>Conclusion: Conformity</p> <p>Justification: MK 04 and MK 05 satisfy the requirement⁹.</p>	

Annex 6 of the PEFC TD, 5	MK 05
Are the procedures for the notification of certification bodies non-discriminatory?	Conditions for issuance of the notification only requires to be (i) a legal entity, (ii) to agree to be registered, (iii) valid accreditation and (iv) to pay a notification fee.
<p>Conclusion: Conformity</p> <p>Justification: MK 05 does not include requirements that could be considered as “discriminatory”¹⁰.</p>	

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.

¹⁰ The assessment is only focused on the whether or not the procedures are discriminatory. The content of notification procedures and their compliance with PEFC GD 1004 is not covered by the scope of this assessment.

Annex 1: Stakeholders representation in the WG

	Organization/Institution	Person - representative in the process	email address
1	Public Enterprise Makedonski Sumi	Toni Jovanov and Dejan Mandzukovski	tonijovanov@yahoo.com, d_mandzukovski@yahoo.com,
2	National Association of Private Forest Owners	Vladimir Stojanovski	vlatko_5@hotmail.com
3	Wood Industry Cluster	Ivan Mitrevski	ivan.i.mitrevski@gmail.com
4	Forest Faculty in Skopje	Nikolco Velkovski	nikolcovelkovski@gmail.com
5	Ministry of Agriculture, Forestry and Water Economy: sector Forestry and Hunting	Goran Licovski	goran.licovski@yahoo.com
6	National Park Pelister	Tomislav Petrov	np.pelister@yahoo.com
7	National Park Mavrovo	Tomo Gjorjevski	junpmtomo@yahoo.com
8	Protected Area Jasen	Goce Stavrevski	goce.stavrevski@gmail.com
9	Forest Student Organization DREN	Blagoj Nikolov	gile0013@gmail.com
10	Group of Wood Producers in the Economic Chamber	Mile Stojcevski	mile@mchamber.mk
11	Forestry Labor Chamber	Angele Spirovski and Strahil Kostovski	spirovski.angele@yahoo.com, strahilkostovski@yahoo.com
12	Environment NGO Macedonian Ecological Society	Despina Kitanova	kitanova@mes.org.mk
13	Forestry Secondary School Gjorce Petrov - Kavadarci	Roza Tefova	roza.tefova@yahoo.com

Stakeholders represented in the initial working group

	Organization/Institution	Stakeholder category
1	Public Enterprise Makedonski Sumi	An organisation managing the state owned forests
2	National Association of Private Forest Owners	Private forest owners organisation
3	Wood Industry Cluster	Wood processing
4	Forest Faculty in Skopje	Education and Science
5	Ministry of Agriculture, Forestry and Water Economy	State administration
6	CNVP (Connecting Natural Values and Peoples)	NGO

Annex 2: Comments from the PEFC Council’s international consultation

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

During the two months public consultation (17/1/17 to 18/3/17) no comments were received.

Annex 3: Stakeholders survey

TJConsulting, Luxembourg

Stakeholders' questionnaire

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

12 May2017

Background

The Macedonian forest certification scheme was submitted for endorsement by the PEFC Council.

The PEFC Council has selected TJConsulting to carry out the assessment of the 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 the Republic of Macedonia.**

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 scheme.

Stakeholders are free and encouraged to further distribute the questionnaire to other stakeholders in Macedonia.

Objective

This questionnaire aims at obtaining and considering stakeholders comments and views relating to the development of the Macedonian forest certification scheme, its openness, transparency, stakeholders 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 **15 June 2017**. 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 relating to the start of the development of the scheme and invitation of stakeholders to participate?

Yes No

at the scheme owner website

by a press release

at public magazine and media

by direct mailing

Note:

3. Did you have access to the standard setting procedures/ rules of the scheme owner?¹¹

Yes No

Note: Yes

4. Have you been invited to nominate your representative to the working group responsible for the development of the standard(s)?¹²

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:

¹¹ A written document containing organisation and procedures of the standard setting/revision process.

¹² 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 forest management standard?

- Yes No
- at the website
 - by a 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 the working group

8. Has the work of the working group) been organised in an open and transparent way?¹³

Yes

No

Note:

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

Yes

No

Note:

Other comments

9. Other comments and views on the development of the Macedonian forest certification scheme?

¹³ 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 4: Report from visit to Macedonia

The in-country visit to Macedonia was conducted by Mr Jaroslav Tymrak during four days from 19 to 22 June 2017.

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 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; and.
- Clarification of issues and non-conformities identified in the draft interim report.

Programme and timetable of the visit

Date	19 June 2017	20 June 2017	21 June 2017	22 June 2017
Day	Monday	Tuesday	Wednesday	Thursday
Itinerary	Stakeholders meetings	Stakeholders meetings	Stakeholders meetings	Stakeholders meetings
		Meeting with the applicant Introduction Presentation of findings of the draft interim report Clarification of issues and non-conformities identified in the draft interim report	Meeting with the applicant Presentation of findings of the draft interim report Clarification of issues and non-conformities identified in the draft interim report	closing meeting Presentation of visit findings and their consideration and the next steps in the assessment.

Stakeholders visited and interviewed

Mr Tymrak met a large number of stakeholders relevant to the process of the development of the Macedonian scheme during the in-country visit of Macedonia.

The main topic of the discussion was the standard setting process and their participation in the process, stakeholders participation, consensus building, management of the process.

The meetings also focused on topics relating to the scheme that are relevant and of interest of the particular stakeholder group, including motivations for forest certification, forestry sector in Macedonia and critical forest management issues covered by the scheme's forest management standard.

The following organisations were met and interviewed:

The applicant (The Council of SFM)	Vladimir Stojanovski	National Governing Body
Ministry of Agriculture	Goran Licovski	State administration
	Vojo Gogovski	
Economic Chamber of Macedonia	Mile Stojcevski	Wood processing
	Ljupka Samardziska	
Cluster of wood industry	Ivan Mitrovski	Wood processing, trade
State forest enterprise	Dejan Mandjukovski	Forest owner/manager
Forestry Faculty	Nikolcho Velkovski	Science, education
	Jane Acevksi	
DREN (forestry students association)	Blagoj Nikolov	Youth
MES	Despina Kitanova	Environmental NGO
Labor union	Angele Spirovski	Labour Union
Private forest owners association	Vladimir Stojanovski	Forest owners
	Vojo Sokolovski	
CNVP	Saso Petrovski	
Multifunctional forest area Jasen	Goce Stavrevski	

Annex 5: Responses to the Panel of Experts' review

The final draft report has been reviewed by a Panel of Experts consisting of Mr Stefan Czamutjian, Mr Mark Edwards and Prof Hugh Miller. All their comments were addressed and incorporated into the report.

General Statement on report quality

Clear, neat and straight report.
A well-presented report of an acceptable scheme
<p>The assessor has completed a very thorough assessment of the Macedonian Forest Certification System and has set out the overview of the system components in the body text to support the conclusions on non-conformities. The relevant parts from the PEFC Minimum Requirements Checklist are extremely well populated with evidence to support the conclusions on conformity although, as observed by the assessor, the use of some of the PEFC requirements from its meta-standard lessens the national feel of the forest management standard.</p> <p>I have no reservations on the overall conformity assessment for the report based on my evaluation of the evidence in addressing the PEFC requirements. It is also a valuable report for the national governing body as the assessor has put in a considerable effort to provide feedback in the form of observations for the scheme to work on during the period before the scheduled revision of the scheme.</p> <p>There are issues with font size in a number of locations in the body text – Pages 10; 21; 53; 82; 86; 87; 103; 108;</p> <p>The report needs an Acronyms/Abbreviations section – it would be populated with (not sorted alphabetically as from start of report): WG; PEFC; SFM; MK; ST; GD; IGD; WHO; PoE; IAF; EA; CNVP; AEP; FMP; FSPP; ISO; NGO; DNVP; DREN; MES</p> <p>The assessor need to undertake a thorough check of the report text as some of the quotes from MK documentation don't have opening or closing quotation marks; in some places there are double full stops; when used, dot points should be vertically stacked not aligned horizontally and in some paragraphs, the format move to multiple lines rather than single line for the bulk of the report e.g. 5 Executive Summary & 8.2.2</p>

Specific findings

Report chapter / page	PoE member	Consultant's report statement	PoE member finding	Consultant's response
7.1 / 11	Cz	... that was provided by the applicant as a part of its application for the PEFC <u>re-endorsement</u> and during the assessment process (see chapter 6).	Should read: ... PEFC <u>endorsement</u> ... (<i>as it is the first assessment</i>)	Accepted. Changed
p77 PEFC ST1003 5.3.3	HGM	“Conclusion: Minor non-conformity “Justification: MK03 satisfies the requirements”.	Surely if it satisfies the requirements it must conform. There is no mention of this being a non-conformity elsewhere in the report. Perhaps the “non-conformity” is a hang-over from an earlier draft and the matter has since been resolved. At all event a correction is required here.	Accepted. Changed. Note: Should be “conformity” based on changes in the applicant's documentation made after the draft interim report.

Editorial comments

Report chapter / page	PoE member	Consultant's report statement	PoE member editorial comment	Consultant's response
5 / 5	Cz (Dispute settlement procedures). and revision process is primarily governed by Attachment 2-12 (Standard Setting –	There seems to be a disorder in the sentence.	Accepted. Changed
5.3 / 6	Cz	(7) Forest Conversion (PEFC ST 1003, 5.11)	Should read: PEFC ST 1003, 5.1.11	Accepted. Changed
7.1 / 11	Cz	The assessment that resulted in the draft interim report was carried out as a <u>desktop exercise</u> based on the documentation that was provided by the applicant as a part of its application for the PEFC <u>re-endorsement</u> and during the assessment process (see chapter 6).	Please include the on-site visit and correct to first assessment (or similar).	Accepted. Changed
8.2.1 / 18	Cz	c) It is assumed that no prevailing interest <u>exist</u> for stakeholders ...	Should read: <u>exists</u>	Accepted. Changed
8.2.3 / 31	Cz	4.4 a Process: c) the invitation was not communicated in a timely manner and did not <u>provided</u> stakeholders sufficient time ...	Should read: provide	Accepted. Changed
8.2.3 / 46	Cz	5.8 Process: Such <u>an official</u> records are missing.	Should read: Such official records are missing.	Accepted. Changed
8.3.1 / 52	Cz	Participating forest owners shall: - Commit <u>itself</u> to comply ...	Should read: Commit <u>themselves</u> to comply ...	Accepted. Changed
8.4.1 / 63	Cz	Bullet 3, (iii), (iv)	The sub-bullets should read (i) and (ii)	Accepted. Changed
8.6.2.1 / 100	Cz	Observation c)	Should read " <u>minimum</u> requirements" (?)	Accepted. Changed

		... claim that it includes “minim requirements”.		
8.6.2.2 / 106	Cz	Observation: Chapter 4.2 <u>makes</u> <u>provides</u> the certification body...	There seems to be one verb too much.	Accepted. Changed
p19 2 nd subpara	HGM	Under “announcement of the standard setting process” the text lists points (i), (ii), (iii), (iv), <u>(iv)</u>	The last point should be numbered (v)	Accepted. Changed
p41 5.5 Process line 1	HGM	“at the begging of...”	Presumably should read “at the beginning of...”	Accepted. Changed
2 Pg 3	ME	a) Identify conformities and non-conformities of the submitted scheme’s documentation with the PEFC Council requirements b) Provide the PEFC Council Board of Directors with recommendation on the re-endorsement of the submitted scheme’s documentation	‘submitted’ isn’t required as identified it as such in 1 Background Isn’t it the endorsement as it’s the first time for this PEFC national scheme – I don’t see it as a re-endorsement!	Accepted. Changed
3 Pg 3	ME	‘...in the revision of the scheme ...’	If this is the first time, it can’t be a revision; it would be ‘development’ as it’s of the initial scheme	Accepted changed
5.1 3 rd para Pg 5	ME	Standard setting/revision process ‘...as this would require to repeat a significant part of the standard setting revision process.’ ‘The minor non-conformities should be considered by the applicant and resolved during the next regular revision process.’	See footnote comment for Pg 4 This seems fairly light – maybe the PEFC should put the Council for SFM on notice to ensure that these four N/C’s are addressed properly in the next revision of the scheme – say a formal letter with the endorsement decision (if it is accepted by the PEFC GA)	Accepted. The text amended to indicate that the minor non-conformities should be resolved during the next periodic revision of the scheme. The endorsement decision should then be formulated by the PEFC Council.

7.2 1 st para Pg 11 Pg 12	ME	<p>'The following table describes the assessment process ...'</p> <p>Table – State of the assessment</p> <p>Table – Stage 1 assessment</p> <p>Table – Public consultation</p>	<p>Would be more preferable to label it as Table 1 and give it a title i.e. the text would read 'Table 1 describes ...'</p> <p>The PEFC website indicates that the Macedonian scheme was submitted to the PEFC on 16/12/2016. This should be included to indicate total time from 'start to finish'</p> <p>Where is the in-country visit to stakeholders as part of the initial endorsement?</p> <p>How can these dates actually pre-date the announcement of the assessment process i.e. 1st row of table? It seems out of chronological order</p>	<p>The numbering of table accepted. Changed.</p> <p>The "in-country visit" is indicated in the table as "Visit to Macedonia".</p> <p>The public consultation is organised by the PEFC Council and the assessor can influence neither the start nor its end.</p>
8.1.1 2 nd para Pg 13	ME	<p>'...as indicated in the next table.'</p> <p>'...PEFC ST 2002:2013 as the standard for chain of custody certification.'</p> <p>Table - Standard setting rules and procedures</p> <p>Table - Dispute settlement procedures</p>	<p>As with 7.2, this could be Table 2 with an appropriate title</p> <p>Would including 'scheme's' before 'standard' clarify the CoC standard status?</p> <p>This is not the same title as in 6 (Pg 9)</p> <p>In 6 (Pg 9), it includes 'rules and' in the title</p>	Accepted. Changed.
8.1.3 a) Pg 14	ME	<p>'It is also not clear why "the Checklist" should be a part of the "scheme technical documentation"'</p>	<p>An astute observation as the checklist is used by the scheme assessor! It could have a role in ensuring the scheme has 'ticked all the right boxes' before submitting for endorsement</p>	

c)		'... and/or Chain of Custody of Forest Based Products certification' ³ .	Presume it is a footnote in MK 01 and not for this report	The referenced text is a quotation from MK 01.
1 st para	ME	Public consultation - direct mails distributed to stakeholders (15) identified in the stakeholders mapping ^[11] .	Is this email or a letter by postal mail?	This were e-mails. Text amended.
1 st dot pt 2 nd dot pt 4 th dot pt	ME	Results of the evaluation The standard setting process ... '...the standard setting process and the first WG meeting ...' 'Announcement of the start of the standard setting shall be done in a timely manner and at the website ...' 'Pilot test to be organised in the field ...'	Is this the 'first formal WG meeting'? Agrees, this is an omission of concern for a national governing body of the PEFC This would appear to be a 'pilot workshop' which doesn't substitute for field testing but it has some merit as is aided by having an FSC auditor available for a reality check of the forest management requirements	Yes. This was the first meeting of the WG.
8.2.2 Pg 22	ME	Figure in Participation in the stakeholders' survey	Having an 'Indigenous people' category – how can this be categorised as in the Commission/WG section under b) it is claimed that 'indigenous people are not relevant' and in a) no member is identified as Indigenous?	The legend of the chart was not entirely displayed. A figure for indigenous people was 0. The chart amended.
8.2.3 4.1 a)-e) Pg 26/7	ME	'Justification: MK 02 requires/includes ...'	In indicating the MK 02 compliance, is it possible to quote the chapter/section as was done for 4.1 f)?	The chapter is clearly indicated in the description of the compliance.
4.2 Procedures Pg 28	ME	'MK 02, chapter 5.2.1 requires that a public announcement for the start of the development/revision process shall also include a link to the publicly available standard setting procedures. '	What about review and consideration of comments – is that included in the conformity finding?	Covered under the requirement 5.4 of PEFC ST 1001.

4.3 Process Pg 29	ME	'...that the standardisation body would reject any request for records to be made available.'	Would this be an observation?	No. This is a statement justifying the conformity.
4.4 Process Pg 30	ME	'Their composition is described under the following requirements and presented in Annex 1.'	Where or what are 'the following requirements'?	The following requirements refers to 4.4a – 4.4c. Text amended.
5.1 & 5.2 Process Pg 35/36	ME	'...and a manner of communication.'	Clarify this text – is this between the stakeholder and Council for SFM?	Accepted. Changed.
5.3 Process Pg 37	ME	'The link to the CNVP website (provided in the Checklist) does not result in the announcement. The applicant argues that the link was lost during the reconstruction of the CNVP website.'	This is credible but a screen shot of the announcement should have been archived for this initial endorsement process – keep in mind for future.	The statement is one of justifications for the minor non-conformity.
5.4 Procedures Pg 40	ME	Conclusion: Minor non-conformity	This assessment doesn't accord with the justification and isn't listed on Page 5 or Page 20 – so is this the incorrect assessment?	Error. Amended to "Conformity".
8.3.2 4.2.1 b) Pg 56	ME	'...the requirements of PEFC MKD Forest Management Standard – PEFC MK 03:2016".'	Not the same as the Standard on Page 9!	This is a quotation from the document that is introduced with inverted commas. The fact the documentation is not properly referenced is included amongst observations.
8.4.1 Pg 63	ME	Pesticides WHO '...for the approval of derogations from the prohibited pesticides.'	Or is it 'permissions' for 'derogations' if correct to the previous sentence	The term "derogation" is a synonym for "exception". The meaning of the text is that the PEFC Council does not approve the derogations.
5.1.5 Pg 67'	ME	'Criterion 1.2. makes a reference to the legislation, including a Rulebook for the	Presume its Macedonian? Clarify to avoid doubt	The Rulebook is a part of the legislation.

		content of Forest Management Plans (FMP).'		
5.1.11 Pg 70	ME	“There is no decrease in the areas under forest (except in cases in correlation with national regulation)”.’	Is this from the same criterion or another one? Clarify to avoid doubt	This a a part of Criterion 1.3. Clarified in the text.
5.2.4 Pg 73	ME	‘MK 03 makes references to relevant forest legislation other forest policy instruments for each criterion.’	Would this be a general statement for the opening section of this chapter?	This justification relates to the PEFC requirement for the use of policy instruments (PEFC ST 1003, 5.2.4).
5.3.3 Pg 77	ME	“Forest management practices supports capacities of forest resources for production of diversified timber and non-timber products and services.”	Does this support 5.3.1?	Accepted. Changed.
8.6.2.1 Pg 99	ME	Assessment conclusion ‘...Annex 6 of the PEFC Technical Document ...’ Observations c)’... that it includes “minim requirements”. g) to i)	Or it could be ‘the PEFC requirements for forest management certification bodies’ if want to keep consistent with 8.5 & 8.6 and equivalent to 8.2 (Pg 20) Spelling error from document or is it a transcription error? Are these not non-conformities which can be rectified in the scheme documentation? – this would be my view from the limited evidence provided	The PEFC Council does not define requirements for the issues identified in the observations. Therefore, the report cannot state a non-conformity.
8.6.2.2 Pg 110	ME	‘Chapter 4.6 states that “The certificate shall contain at least the following information: ...Name of accreditation body and number of accreditation of the certification body.’	Is this equivalent to the accreditation symbol?	Yes. This would be considered as the accreditation symbol and would indicate that the certificate is covered by the scope of accreditation.

Annex 2 1 st para Pg 113	ME	'The PEFC Council has announced at its website an international consultation on the endorsement of the Macedonian scheme.	Please insert the dates to indicate the 60 day period i.e. 17/1/17 to 18/3/17 (as per the PEFC website)	
Annex 4 1 st Table Pg 119 2 nd Table Pg 120	ME	Date row in the table 'closing meeting' [No text]	It's one or the other i.e. with no year or include the year Was there an 'opening meeting'? Should be a heading row with descriptors i.e. Organisation : Representative : Stakeholder group	Accepted. Changed.

Additional editorial comments

The assessor reviewed and accepted all editorial comments and suggestions.